

## Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2010

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Ballast Phoenix Limited

Ince Marshes IBA Aggregate Facility  
Land off Lordship Lane  
Ince  
Cheshire

Permit number

EPR/TP3836FC

# Ince Marshes IBA Aggregate Facility

## Permit Number EPR/TP3836FC

### Introductory note

#### ***This introductory note does not form a part of the permit***

This permit controls the operation of part of an installation, whose purpose is the processing of incinerator bottom ash (IBA) which is produced by the neighbouring Ince Refuse Derived Fuel Plant. A separate EPR permit issued to Covanta Energy Limited covers the operation of the Ince Refuse Derived Fuel Plant. The facility covered by this permit and the Ince Refuse Derived Fuel Plant comprise a single installation.

This permit also controls a waste operation whose purpose is the processing of incinerator bottom ash (IBA) which is received from off-site incineration plant(s).

The main features of the permit are as follows.

The IBA processing site will comprise of three zones:

- (1) Receipt and storage of unprocessed IBA from incineration plants;
- (2) Processing of IBA, comprising magnetic eddy current separation to remove all metals and screens to grade the IBA; and
- (3) A storage area for processed Incinerator Bottom Ash Aggregate (IBAA) prior to transportation off-site.

The IBA processing plant will accept up to 250,000 tonnes of IBA per annum predominately from the adjacent Ince Refuse Derived Fuel Plant and with less than 50% coming from other off-site incineration plants, to produce incinerator bottom ash aggregate (IBAA).

IBAA is processed IBA, utilising bottom ash from the thermal treatment of municipal solid waste, and is generally accepted as a replacement for the majority of primary aggregates by both UK and European standards (EN).

The IBA will be transferred by road vehicles from the adjacent Ince Refuse Derived Fuel Plant and other off-site incineration plants to the IBA processing site. IBA is quenched within the adjacent Ince Refuse Derived Fuel Plant and other off-site incineration plants, which means that the IBA is transported wet which will prevent fugitive dust emissions during transportation.

During the handling process IBA remains in a moist condition. There are no point source emissions to air. The only fugitive emission to air is water vapour. The IBA processing is undertaken within a building and water sprays/cannons are available to use on site for dust prevention. Surface water run-off and rain water is collected in a lagoon for use in dust suppression.

Surface water run-off from the site is collected in a lagoon, and treated through a reed bed before being discharged at the installation boundary into a pond. From the pond it is then discharged into the west central drain before being pumped into the Manchester Ship Canal.

IBAA is processed to the operator's own in-house quality protocol, which features the inspection of the material prior to processing and ensures the material is suitable for mechanical treatment.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

**Status Log of the permit**

<b>Detail</b>	<b>Date</b>	<b>Comments</b>
Application EPR/TP3836FC/A001	Duly made 23/11/11	
Response to Schedule 5	Received 13/01/12	
Memorandum Ref S0986-0320-0098JRS	Received 27/02/12	
Permit determined	03/05/12	

**Other Part A installation permits relating to this installation**

<b>Operator</b>	<b>Permit Number</b>	<b>Date of Issue</b>
Covanta Energy Limited	EPR/LP3132FX (Original Permit No. TP3135LS)	21/12/06

End of Introductory Note

# Permit

The Environmental Permitting (England and Wales) Regulations 2010

Permit number

**EPR/TP3836FC**

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2010

**Ballast Phoenix Limited** (“the operator”),

whose registered office is

**Victoria Stables**

**South Road**

**Lincolnshire**

**Bourne**

**PE10 9JZ**

company registration number **03290431**

to operate part of an installation and a waste operation at

**Ince Marshes IBA Aggregate Facility**

**Land off Lordship Lane**

**Ince**

**Cheshire**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
	<b>03/05/2012</b>

Anne Nightingale

Authorised on behalf of the Environment Agency

# Conditions

## 1 Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

### 1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where waste disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 review and record at least every four years whether changes to those measures should be made; and take any further appropriate measures identified by a review.

## **1.5 Multiple operator installations**

- 1.5.1 Where the operator notifies the Environment Agency under condition 4.3.1 (a) or 4.3.1 (c), the operator shall also notify without delay the other operator(s) of the installation of the same information.

# **2 Operations**

## **2.1 Permitted activities**

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").
- 2.1.2 Waste authorised by this permit in condition 2.3.2 shall be clearly distinguished from any other waste on the site.
- 2.1.3 Hazardous waste must not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

## **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit, which is within the area edged in red on the site plan that represents the extent of the installation covered by this permit and that of the other operator of the installation.

## **2.3 Operating techniques**

- 2.3.1 (a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- (b) If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan specified in schedule 1, table S1.2 or otherwise required under this permit, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.1; and

- (b) it conforms to the description in the documentation supplied by the producer and holder.

2.3.3 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

## **2.4 Improvement programme**

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

## **2.5 Pre-operational conditions**

2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.4 have been completed.

# **3 Emissions and monitoring**

## **3.1 Emissions to water, air or land**

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 table S3.1.

3.1.2 The limits given in schedule 3 shall not be exceeded.

## **3.2 Emissions of substances not controlled by emission limits**

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan;

- (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### **3.3 Odour**

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan;
- (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.4 Noise and vibration**

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.5 Monitoring**

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following table S3.1 in schedule 3 to this permit.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.



## 4 Information

### 4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

### 4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production /treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.2 using the forms specified in table S4.3 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
  - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.3 ; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

## 4.3 Notifications

- 4.3.1 The Environment Agency shall be notified without delay following the detection of:

- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution;
- (b) the breach of a limit specified in the permit; or
- (c) any significant adverse environmental effects.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

- 4.3.3 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

- 4.3.4 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

- 4.3.5 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

## 4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "without delay", in which case it may be provided by telephone.

# Schedule 1 - Operations

<b>Table S1.1 activities</b>		
<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
5.1 A(1)(c)	The incineration of non-hazardous waste in an incineration plant with a capacity of 1 tonne per hour or more.	The receipt, handling, storage and treatment of incinerator bottom ash only from within the installation.
<b>Description of activit(y)(ies) for waste operation(s)</b>		
<b>R4:</b> Recycling/reclamation of metals and metal compounds  <b>R5:</b> Recycling/reclamation of other inorganic materials	Storage and treatment of incinerator bottom ash.	The receipt, handling, storage and treatment of non-hazardous incinerator bottom ash other than from the installation Waste types as specified in Table S2.1

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application (EPR/TP3836FC/A001)	All sections, excluding Section 2.4.1	23/11/11
Response to Schedule 5 Notice dated 22/12/11	All responses excluding: <ul style="list-style-type: none"> <li>All of the response to Question 3</li> <li>Second bullet point referring to monitoring of water discharge from the reed bed in the response to Question 8</li> </ul>	13/01/12
Memorandum dated 27/02/12: Subject: Ince Marshes IBAA facility – Points for Clarification, Ref: S0986-0320-0098JRS	All	27/02/12

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC1	The operator shall submit a written report to the Environment Agency on the implementation of its Environmental Management System and the progress made in the accreditation of the system by an external body or if appropriate submit a schedule by which the EMS will be subject to accreditation.	Within 4 months of the completion of commissioning.
IC2	The operator shall submit a written report to the Environment Agency. The report shall summarise the environmental performance of the facility as installed against the design parameters set out in the Application. The report shall also include a review of the performance of the facility against the conditions of this permit and details of procedures developed for achieving and demonstrating compliance with permit conditions.	Within 4 months of the completion of commissioning.

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC3	<p>The operator shall undertake the monitoring program agreed in PO5. The operator shall review the data gathered from the monitoring program and shall submit a report to Agency detailing the findings and conclusions from the review.</p> <p>The review of the sampling data is required to demonstrate that the discharge is not and will not have an impact on eel migration. Where the review does not demonstrate this, further control measures should be proposed. This may include but not be limited to the consideration of the following:</p> <ul style="list-style-type: none"> <li>• enclosure of the IBA stockpiles</li> <li>• further treatment of the water prior to its discharge</li> <li>• alternative discharge routes avoiding the eel migration routes</li> </ul> <p>The Environment Agency will assess the data and the report and, once approved any compliance limits and future monitoring requirements shall be incorporated into table S3.1. If further control measures are required these will be will be implemented as approved by the Environment Agency.</p>	Within 12 months of the completion of commissioning.
IC4	<p>The operator shall submit a report, for approval by the Environment Agency, detailing the installation and commissioning of the reed bed treatment as agreed under PO4. This should compare the installed reed bed performance against the design parameters set out in the application, and in particular the pollution reduction factors. Where these differ, a revised H1 assessment shall be included as part of the report to demonstrate that the discharge will not have a significant environmental impact on the receiving waters.</p>	As agreed with the Environment Agency under PO4 in Table S1.4.

<b>Table S1.4 Pre-operational measures</b>	
<b>Reference</b>	<b>Pre-operational measures</b>
PO1	<p>Prior to the commencement of commissioning, the operator shall send a summary of the site Environment Management System (EMS) to the Environment Agency and make available for inspection all documents and procedures which form part of the EMS. The EMS shall be developed in line with the requirements set out in Section 1 of How to comply with your environmental permit – Getting the basics right. The documents and procedures set out in the EMS shall form the written management system referenced in condition 1.1.1 (a) of the permit.</p>
PO2	<p>Prior to the commencement of commissioning, the operator shall submit a written report to the Agency detailing the waste acceptance procedure to be used at the site. The waste acceptance procedure shall include the process and systems by which wastes unsuitable for treatment at the site will be controlled. The procedure shall be implemented in accordance with the written approval from the Agency.</p>
PO3	<p>The operator shall undertake eel and water quality monitoring to establish a baseline for further assessment of the impact of the discharge. The scope, location and duration of this monitoring will be agreed with the Environment Agency and will include one migration period before the discharge commences. The operator shall review all sampling data and submit a report to the Environment Agency.</p>
PO4	<p>Prior to the commencement of commissioning, the operator shall submit a report outlining the proposal for the installation and commissioning of the reed bed. This shall include a proposal for demonstrating the performance of the reed bed against the design parameters. The scope and timescales of the proposal shall be agreed with the Environment Agency.</p>

<b>Table S1.4 Pre-operational measures</b>	
<b>Reference</b>	<b>Pre-operational measures</b>
PO5	<p>The operator shall submit to the Agency for approval proposals for a monitoring program to assess the impact on water quality and eels in the west central drain from discharges of site effluent once the site is operational. The proposals shall include, but not be limited to;</p> <ul style="list-style-type: none"> <li>• Monitoring duration</li> <li>• Parameters to be monitored</li> <li>• Reference period</li> <li>• Monitoring frequency</li> <li>• Limits, taking into account PO3</li> <li>• Monitoring standard or method</li> </ul> <p>The Environment Agency will assess the proposals and, once approved any compliance limits shall be incorporated into table S3.1. The monitoring program will be implemented in accordance with IC3.</p>

## Schedule 2 - Waste types, raw materials and fuels

**Table S2.1 Permitted waste types and quantities**

Maximum quantity	All IBA produced by the Ince Refuse Derived Fuel Plant within the installation and imported from offsite (250,000 tonnes/year).
	As this is part of a single installation, the incinerator waste brought in from elsewhere should be less than 50% of the total waste treated.
Waste code	Description
<b>19</b>	<b>Wastes from Waste Management Facilities, Off-site Waste Water Treatment Plants and the Preparation of Water Intended for Human Consumption and Water for Industrial Use</b>
<b>19 01</b>	<b>wastes from incineration or pyrolysis of waste</b>
19 01 12	bottom ash and slag other than those mentioned in 19 01 11.

## Schedule 3 – Emissions and monitoring

<b>Table S3.1 Point Source emissions to water (other than sewer) – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Parameter</b>	<b>Source</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1 – Emission point from reed bed (Shown on Drawing No. 986-026, Revision A2, Dated 06.09.11)	As agreed under PO5 in Table S1.4.	Surface water run-off and RBC effluent discharged via the reed bed	As agreed under PO5 in Table S1.4.	As agreed under PO5 in Table S1.4.	As agreed under PO5 in Table S1.4.	As agreed under PO5 in Table S1.4.



## Schedule 4 - Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Emissions to water Parameters as required by condition 3.5.1	S1	Annually	1 Jan

<b>Table S4.2 Annual production/treatment</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Incinerator Bottom Ash received from the Installation	Annually	Tonnes
Incinerator Bottom Ash received from off-site sources	Annually	Tonnes
Ferrous Metals Recovered	Annually	Tonnes
Non-Ferrous Metals Recovered	Annually	Tonnes
IBA Aggregate Recovered	Annually	Tonnes
Amount Disposed to Landfill	Annually	Tonnes
Water usage	Annually	m <sup>3</sup> per tonne of processed ash
Energy usage	Annually	MWh per tonne of processed ash

<b>Table S4.3 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Water	Form water 1 or other form as agreed in writing by the Environment Agency	03/05/12
Residues	Form residues1 or other form as agreed in writing by the Environment Agency	03/05/12
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	03/05/12

# Schedule 5 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

Permit Number	<b>EPR/TP3836FC</b>
Name of operator	<b>Ballast Phoenix Limited</b>
Location of Facility	<b>Ince Marshes IBA Aggregate Facility, Land off Lordship Lane, Ince, Cheshire</b>
Time and date of the detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

Measures taken, or intended to be taken, to stop the emission	
---------------------------------------------------------------	--

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

**Part B - to be submitted as soon as practicable**

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

<b>Name*</b>	
<b>Post</b>	
<b>Signature</b>	
<b>Date</b>	

\* authorised to sign on behalf of the operator

## Schedule 6 - Interpretation

“*accident*” means an accident that may result in pollution.

“*Annex I*” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*Annex II*” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*application*” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“*authorised officer*” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“*bottom ash*” means ash falling through the grate and transported by the grate

“*disposal*” means a disposal operation provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*emissions to land*” includes emissions to groundwater.

“*EP Regulations*” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“*emissions of substances not controlled by emission limits*” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“*groundwater*” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“*quarterly*” for reporting/sampling means after/during each 3 month period, January to March; April to June; July to September and October to December and, when sampling, with at least 2 months between each sampling date .

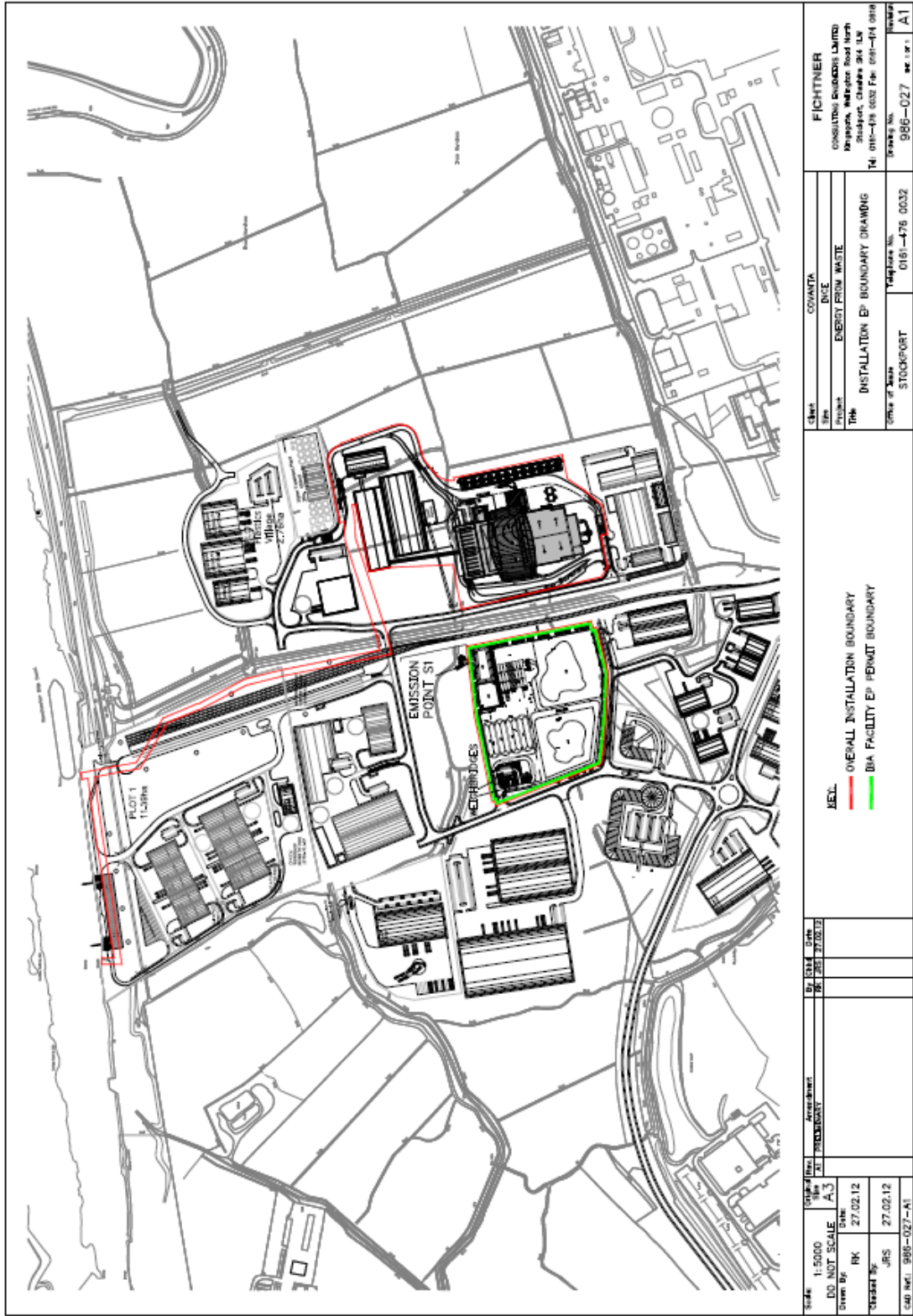
“*recovery*” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*Waste code*” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“*WFD*” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“*year*” means calendar year ending 31 December.

# Schedule 7 – Site Plan



Scale: 1:5000	Sheet No: 1	Sheet Count: 1	Drawn By: RK	Checked By: JRS	Issue Date: 27.02.12	Issue No: 27.02.12	Client: COVANTA	Site: DICE	Project: ENERGY FROM WASTE	Title: INSTALLATION EP BOUNDARY DRAWING	Office of Issue: STOCKPORT	Telephone No.: 0161-476 0032	Drawing No.: 986-027	Rev. No.: A1
Issue Date: 27.02.12	Issue No: 27.02.12	Client: COVANTA	Site: DICE	Project: ENERGY FROM WASTE	Title: INSTALLATION EP BOUNDARY DRAWING	Office of Issue: STOCKPORT	Telephone No.: 0161-476 0032	Drawing No.: 986-027	Rev. No.: A1	<b>FICHTNER</b> CONSULTING ENGINEERS LIMITED 100, WILSON ROAD, SOUTH WESTON-SUPER-MARE, ESSEX, SS16 5NF TEL: 01702-433333 FAX: 01702-433333				

Permit Number: TP3836FC

Operator:

Ballast Phoenix Limited

Facility: Ince Marshes IBA Aggregate Facility

Form Number:

WaterUsage1 / 03/05/12

**Reporting of Water Usage for the year**    YYYY

Water Source	Usage (m <sup>3</sup> /year)	Specific Usage (m <sup>3</sup> /unit output)
Mains water		
<b>TOTAL WATER USAGE</b>		

Operator's comments :

Signed .....  
 (authorised to sign as representative of Operator)

Date.....

Permit Number : TP3836FC

Operator : Ballast Phoenix Limited

Facility : Ince Marshes IBA Aggregate Facility

Form Number : Residue 1/03/05/12

**Reporting of residue quality for the period from .....to.....**

Parameter	Total (Tonnes per year)
Incinerator Bottom Ash Received from the Installation	
Incinerator Bottom Ash Received from off-site sources	
Ferrous Metals Recovered	
Non-Ferrous Metals Recovered	
Aggregate Recovered	
Amount Disposed to Landfill	

Operator's comments :

Signed .....  
(authorised to sign as representative of Operator)

Date.....

Permit Number: TP3836FC

Operator: Ballast Phoenix Limited

Facility: Ince Marshes IBA Aggregate Facility Form Number: Energy1 / 03/05/12

**Reporting of Energy Usage for the year** YYYY

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity *	MWh		
Natural Gas	MWh		
Gas Oil	tonnes		
Recovered Fuel Oil	tonnes		
TOTAL	-		

\* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments :

Signed .....  
(Authorised to sign as representative of Operator)

Date.....



# Determination of an Application for an Environmental Permit under the Environmental Permitting (England & Wales) Regulations 2010

## Decision document recording our decision-making process

The Permit Number is:                   EPR/TP3836FC  
The Applicant / Operator is:           Ballast Phoenix Limited  
The Installation is located at:       Ince Marshes IBA Aggregate Facility, Land off Lordship Lane, Ince, Cheshire

### What this document is about

This is a decision document, which accompanies a permit.

It explains how we have considered the Applicant's Application, and why we have included the specific conditions in the permit we are issuing to the Applicant. It is our record of our decision-making process, to show how we have taken into account all relevant factors in reaching our position. Unless the document explains otherwise, we have accepted the Applicant's proposals.

The permit and decision document is for part of an installation. The Installation as a whole is a plant, whose purpose is the disposal of waste with energy recovery in an incineration plant. This permit therefore only regulates the operation of that part of the installation which is concerned with the processing of incinerator bottom ash (IBA). It is permitted separately from the incinerator because it will be under the control of a different operator.

### Preliminary information and use of terms

We gave the application the reference number EPR/TP3836FC. We refer to the application as “the **Application**” in this document in order to be consistent.

The number we have given to the permit is EPR/TP3836FC. We refer to the proposed permit as “the **Permit**” in this document.

The Application was duly made on 23 November 2011.

The Applicant is Ballast Phoenix Limited. We refer to Ballast Phoenix Limited as “the **Applicant**” in this document. Where we are talking about what would

happen after the Permit is granted (if that is our final decision), we call Ballast Phoenix Limited “the **Operator**”.

Ballast Phoenix Limited’s proposed facility is located at Land Off Lordship Lane, Ince, Cheshire. We refer to this as “the **Installation**” in this document.

## **How this document is structured**

- Glossary of acronyms
- Our proposed decision
- How we reached our decision
- The legal framework
- The Installation
- Minimising the installation’s environmental impact
- Application of Best Available Techniques
- Other legal requirements
- Annexes
  - Pre-Operational Conditions
  - Improvement Conditions
  - Consultation Responses

## Glossary of acronyms used in this document

(Please note that this glossary is standard for our decision documents and therefore not all these acronyms are necessarily used in this document.)

BAT	Best Available Technique(s)
BREF	BAT Reference Note
CROW	Countryside and rights of way Act 2000
DAA	Directly associated activity – Additional activities necessary to be carried out to allow the principal activity to be carried out
DD	Decision document
ELV	Emission limit value
EMS	Environmental Management System
EPR	Environmental Permitting (England and Wales) Regulations 2010 (SI 2010 No. 675) as amended
EQS	Environmental quality standard
EWC	European waste catalogue
IBA	Incinerator Bottom Ash
IBAA	Incinerator Bottom Ash Aggregate
IPPCD	Integrated Pollution Prevention and Control Directive (2008/1/EC)
MSC	Manchester Ship Canal
PC	Process Contribution
PEC	Predicted Environmental Concentration
RBC	Rotating Biological Contractor
SAC	Special Area of Conservation
SPA(s)	Special Protection Area(s)
SSSI(s)	Site(s) of Special Scientific Interest
SWMA	Specified waste management activity
WFD	Waste Framework Directive (2008/98/EC)
WID	Waste Incineration Directive (2000/76/EC)

# 1 Our proposed decision

We have decided to grant the Permit to the Applicant. This will allow it to operate the part of the Installation described in the Permit, subject to the conditions in the Permit.

We consider that, in reaching that decision, we have taken into account all relevant considerations and legal requirements and that the permit will ensure that a high level of protection is provided for the environment and human health.

This Application is to operate part of an installation which is subject principally to the Integrated Pollution Prevention and Control Directive (IPPCD) and the Waste Incineration Directive (WID).

# 2 How we reached our decision

The Application was duly made on 23 November 2011. This means we considered it was in the correct form and contained sufficient information for us to begin our determination but not that it necessarily contained all the information we would need to complete that determination: see below.

The Applicant made no claim for commercial confidentiality. We have not received any information in relation to the Application that appears to be confidential in relation to any party.

We carried out consultation on the Application in accordance with the EPR, our statutory PPS and our own RGS Note 6 for Determinations involving Sites of High Public Interest. The way in which we did this is set out below.

The following organisations were consulted:

- Local Environmental Protection Department (Cheshire West and Chester Council)
- Food Standards Agency
- H&S Executive
- Primary Care Trust (West Cheshire PCT)
- Planning Authority (Cheshire West and Chester Council)
- Health Protection Agency
- Peel Holdings

We advertised the Application by a notice on our website, which contained information telling people where and when they could see a copy of the Application. We also placed an advertisement in the Chester Chronicle on 22 December 2011.

A briefing note was prepared and supplied to the Ince Community Forum, for inclusion on their website.

Due to the Christmas break the usual 4 week consultation period was extended to 6 weeks to allow consultees sufficient time to respond.

The consultation for the IBA plant is consistent with the consultation undertaken for the recent variation to Ince Refuse Derived Fuel Plant (LP3132FX).

Further details along with a summary of consultation comments and our response to the representations we received can be found in Annex 3. We have taken all relevant representations into consideration in reaching our determination.

Although we were able to consider the Application duly made, we did in fact need more information in order to determine it, and issued an information notice on 22<sup>nd</sup> December 2011. A copy of the information notice was placed on our public register and sent to Cheshire West and Chester Council for inclusion on its register, as was the response when received.

In addition to our information notice, we received additional information during the determination from the applicant:

- Memorandum dated 27 February 2012, Subject: Ince Marshes IBAA Facility – Points for Clarification – Ref S0986-0320-0098JRS

We made a copy of this information available to the public in the same way as the response to our information notice.

Finally we have consulted on our draft decision from 30 March 2012 to 2 May 2012. A summary of the consultation responses and how we have taken into account all relevant representations is shown in Annex 3B.

### **3 The legal framework**

The Permit will be granted, if appropriate, under Regulation 13 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the Installation is:

- part of an *installation* for the purposes of the IPPCD;
- part of a *waste incineration plant* as described by the WID;
- an *operation* covered by the WFD, and
- subject to aspects of other relevant legislation which also have to be addressed.

We address some of the major legal requirements directly where relevant in the main body of this document. Other requirements are covered in a section towards the end of this document.

We consider that, in granting the Permit, it will ensure that the operation of the Installation as a whole complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

## **4 The Installation**

### **4.1 Description of the Installation and related issues**

The Application is for part of an installation. The Installation as a whole is a plant, whose purpose is the disposal of waste with energy recovery in an incineration plant. This permit only controls those processes concerned with the treatment of incinerator bottom ash.

The Installation as a whole is subject to the EPR because it carries out an activity listed in Part 1 of Schedule 1, Paragraph 5.1A(1)(c) – the incineration of non-hazardous waste in an incineration plant with a capacity of 1 tonne per hour or more.

The treatment of incinerator bottom ash from an incineration plant on the same site as the incineration plant forms part of the listed activity. It is not a “directly associated activities” for EPR purposes.

The plant also receives and processes incinerator bottom ash from other sites. This is also not a directly associated activity and because it is not technically connected to the incineration process this is listed as a separate waste activity. However, the process applied to the untreated ash brought in from outside the installation is identical to that produced onsite, using the same equipment.

This permit therefore regulates the operation of that part of the listed activity and the separate waste activity which are concerned with the processing of incinerator bottom ash (IBA). It is permitted separately from the incinerator because it is under the control of a different operator. Schedule 1, table S1.1 of the permit sets out the limits of the activities which can be carried out under this permit.

### **4.2 The site and its protection**

The site for the IBA Facility is located at Ince Marshes, Cheshire, approximately 10km to the north east of Chester and 1.4km to the east of Ince

village. Holme Farm is approximately 0.9km to the north west. The site is located on Plot 4 of the Ince Park development site.

The Applicant submitted a plan which we consider is satisfactory, showing the site and its extent on which the permitted activities will take place and of the Installation as a whole. A plan is included in Schedule 7 to the Permit, and the Operator is required to carry on the activities set out in table S1.1 within the site boundary.

A Site Condition Report has been provided as part of the permit application. The Environment Agency has assessed the site condition report submitted. Sufficient information has been supplied to describe the condition of the site at permit issue

The key features of the site to prevent and minimise the accidental release of polluting substances for the installation are set out below:

Potentially contaminated water from leachate/run-off from ash stockpile spraying and all surface water run-off from the IBA facility is collected via the sites drainage system which is stored in a lined/impermeable lagoon prior to treatment in a lined reed bed, prior to its discharge to surface water.

#### 4.3 Operation of the Installation – general issues

##### 4.3.1 Administrative issues

This is a multi-Operator Installation. The Ince Refuse Derived Fuel Plant that also forms part of this installation will be will be operated by Covanta Energy Limited. This part of the Installation is already permitted (EPR/LP3132FX (Original Permit No. TP3135LS)).

We have recently issued a substantial variation (EPR/LP3132FX/V002) for the Ince Refuse Derived Fuel Plant. This application for the IBA Facility arises as a result of the changes resulting from that substantial variation.

We are satisfied that the Applicant is the person who will have control over the operation of the relevant part of the Installation after the granting of the Permit; and that the Applicant will be able to operate the part of the Installation so as to comply with the conditions included in the Permit.

The incineration of waste (which includes on site ash treatment) is not a specified waste management activity (SWMA). The Environment Agency has considered whether any of the other activities taking place at the Installation are SWMAs or relevant waste operations requiring prior planning consent. We consider that the following waste operation is taking place:

- Processing of IBA from incinerators other than the adjacent Ince Refuse Derived Fuel Plant that forms part of this installation

The predominant use of the IBA facility is to accept IBA from the Ince Refuse Derived Fuel Plant which forms part of this installation. Whilst treating some IBA imported from elsewhere is a waste operation, as it is taking place at an installation for the incineration of waste it is neither a SWMA or a relevant waste operation as defined in EPR.

The Environment Agency is satisfied that planning permission for these SWMAs / relevant waste operations is not required for the reasons outlined above.

#### 4.3.2 Management

The Applicant has stated in the Application that they will implement an Environmental Management System (EMS) that will be certified under ISO14001. A pre-operational condition (PO1) is included requiring the Operator to provide a summary of the EMS prior to commissioning of the plant and to make available for inspection all EMS documentation. The Environment Agency recognises that certification of the EMS cannot take place until the Installation is operational. An improvement condition (IC1) is included requiring the Operator to report progress towards gaining accreditation of its EMS.

A further improvement condition (IC2) has been included requiring the Operator to submit a report on the commissioning of the facility to demonstrate compliance with the conditions of the Permit.

The Installation will accept IBA waste from incinerators other than the Ince Refuse Derived Fuel Plant which forms part of this installation. To ensure appropriate waste acceptance procedures are in place for this incoming waste, a pre-operational condition (PO2) is included requiring the Operator to detail this procedure and agree it with the Environment Agency.

We are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

#### 4.3.3 Site security

Having considered the information submitted in the Application, we are satisfied that appropriate infrastructure and procedures will be in place to ensure that the site remains secure.

#### 4.3.4 Accident management

The Applicant has submitted an Accident Risk Assessment and Management Plan. Having considered the Plan and other information submitted in the Application, we are satisfied that appropriate measures will be in place to ensure that accidents that may cause pollution are prevented but that, if they should occur, their consequences are minimised. An Accident Management



Plan will form part of the Environmental Management System and must be in place prior to commissioning as required by a pre-operational condition (PO1).

#### 4.3.5 Off-site conditions

We do not consider that any off-site conditions are necessary.

#### 4.3.6 Operating techniques

We have specified that the Applicant must operate the Installation in accordance with the following documents contained in the Application:

<b>Description</b>	<b>Parts Included</b>	<b>Justification</b>
Application EPR/TP3138FC/A001, received 23/11/11	Ince Marshes IBAA Facility – Environmental Permit Application Supporting Information - All parts, excluding Section 2.4.1	Details appropriate operating techniques.  Section 2.4.1 relates to emissions monitoring. This will be addressed through PO5 and IC3.
Response to Schedule 5 Notice dated 22/12/11. Response received 13/01/12	All responses excluding: <ul style="list-style-type: none"> <li>• All of the response to Question 3</li> <li>• Second bullet point referring to monitoring of water discharge from the reed bed in the response to Question 8</li> </ul>	Details appropriate operating techniques.  As this permit is part of an installation, WAMITAB or similar is not required.  Monitoring of discharges to surface water will be addressed through PO5 and IC3.
Memorandum dated 27/02/12: Subject: Ince Marshes IBAA facility – Points for Clarification, Ref: S0986-0320- 0098JRS	All	Details appropriate operating techniques.

The details set out above describe the techniques that will be used for the operation of the Installation that have been assessed by the Environment Agency as BAT; they form part of the Permit through Permit condition 2.3.1 and Table S1.2 in the Permit Schedules.

#### 4.3.7 Avoidance, recovery or disposal with minimal environmental impact of wastes produced by the activities

This requirement addresses wastes produced at the Installation and does not apply to the waste being treated there. Note also that the purpose of this plant is to move the waste up the waste hierarchy (e.g. produce substitute aggregate material and separate the metals for recycling). The principal waste streams the Installation will produce are processed IBA (referred to as Incinerator Bottom Ash Aggregate – IBAA), recovered ferrous and non-ferrous metals, and residual IBA.

Most incinerator bottom ash (IBA) is likely to be classified as non-hazardous waste. However, IBA is classified on the European List of Wastes as a “mirror entry”, which means IBA is a hazardous waste if it possesses a hazardous property relating to the content of dangerous substances. Classification of processed IBA for its subsequent use or disposal is controlled by other legislation and so is not duplicated within the permit.

Waste outputs from the IBA plant are expected to be approximately 7% ferrous metals (recycled elsewhere), 1.5% non-ferrous metals (recycled elsewhere), 1% unburnt material (returned to the Ince Refuse Derived Fuel plant), 3-5% oversize material (crushed for aggregate), 5-8% moisture losses through evaporation, with the balance being IBA Aggregate exported for recovery mainly as road and building construction material. Residual IBA for disposal is expected to be minimal.

Having considered the information submitted in the Application, we are satisfied that the waste hierarchy referred to in Article 4 of the WFD will be applied to the generation of waste and that any waste generated will be treated in accordance with this Article.

We are satisfied that waste from the Installation that cannot be recovered will be disposed of using a method that minimises any impact on the environment. Standard condition 1.4.1 will ensure that this position is maintained.

## **5. Minimising the Installation’s environmental impact**

Regulated activities can present different types of risk to the environment, including: odour, noise and vibration, accidents, fugitive emissions to air and water, releases to air, discharges to ground or groundwater, global warming potential and generation of waste.

For an installation of this kind, the principal emissions are:

- fugitive releases to air (discussed in section 6.2.3 below);
- releases to controlled water and groundwater from uncontrolled releases (discussed in section 5.2 below);
- noise and vibration (discussed in section 6.2.6)

This section of the document assesses the likely impact of emissions from the ash processing part of the installation on human health and the environment and what measures we are requiring to ensure a high level of protection.

## 5.1 Releases to Air

There are no point source emissions to air.

## 5.2 Releases to Water and Groundwater

There are no point source emissions to groundwater. Catch pits, lagoons and the reed bed all have impermeable linings to prevent contaminated water seeping into the ground. Emissions of water will be to surface water – see below.

We have reviewed the Applicant's environmental impact assessment of the emissions to water from the IBA treatment process, which will be discharged, following reed bed treatment at discharge point S1, into Pond 1, which forms part of the wider Ince Park development and then into to the west central drain before being pumped into the Manchester Ship Canal (MSC).

In addition, the wastewater from the offices will be treated in a Rotating Biological Contractor (RBC) system, before the treated effluent is discharged to the lagoon.

The Operators H1 assessment assess the impact of the discharge on the MSC, as this is the first Water Framework Directive designated stretch that receives the discharge. When assessing the impact of a discharge into a Water Framework Directive designated stretch a 'no deterioration' rule is considered whereby the impact of the discharge should not exceed 10% of the EQS. The Operator has used concentration data from lagoon samples taken by the Operator at their Sheffield site, which undertakes a similar operation and taken into account pollution reduction factors that will be provided by the reed bed treatment.

A worst case scenario has been assessed, which considers the highest lagoon concentrations from the samples taken at the Sheffield site and the lowest anticipated reduction factors from the reed bed.

The discharge to surface water will be intermittent, however the mean discharge from the site has been calculated based on the area of the site and average rainfall, which we consider appropriate for use in the H1 assessment.

The H1 tool shows that the predicted process contribution for emissions of Ammonia, Arsenic, Cadmium, Chloride, Chromium III, Copper, Iron, Lead, Mercury, Nickel, Sulphate and Zinc are less than 4% of the EQS Maximum Admissible Concentration (MAC) and <4% of the EQS Annual Average (AA). Where only one criteria is relevant, then if that is satisfied the substance release may be screened out. These are the current thresholds of significance in the H1 tool.

Therefore the Environment Agency concludes that emissions to water from the Installation for these pollutants will not give rise to significant pollution.

The H1 tool shows that the predicted process contribution for emissions of mercury are less than 4% of the Annual Average (AA), but greater than 4% of the MAC.

Therefore the Environment Agency concludes that emissions to water of mercury from the Installation cannot therefore be screened out as insignificant.

We have considered this emission further. The Operator has used a worst case scenario for the mercury concentrations based on the highest concentrations from the Sheffield samples and the lowest reduction factor. If the reed bed operated at the highest possible reduction factor, the emission would screen out as insignificant.

In addition, the short term impact is affected by the maximum effluent flow rate. The Operator has included this as  $0.171\text{m}^3/\text{s}$  based on the maximum monthly rainfall received at any point in the UK. This is an extreme worst case scenario. To put this in context, using a figure of  $0.04\text{ m}^3/\text{s}$ , which is equivalent to receiving approximately the whole of January's rainfall for the area in a single day would reduce the short term %PC of the MAC to 4% and screen out as insignificant, even at the highest concentration.

Furthermore there would be additional dilution from rainfall directly entering the lagoon and reed bed, which has not been taken into account.

Based on this additional assessment, the Environment Agency concludes that emissions to water from the Installation will not give rise to significant pollution.

It should be noted that as a result of the west central drain being identified an eel migratory route, a number of pre-operational conditions and improvement conditions have been included in the permit in relation to water quality monitoring. These are outlined and discussed in more detail in Section 5.4 of this document.

### 5.3 Impact on Human Health

The Environment Agency has a statutory role to protect the environment and human health from all processes and activities it regulates. We have assessed the emissions from the IBA facility and are satisfied that there will not be a significant impact on human health.

### 5.4 Impact on Habitats sites, SSSIs, non-statutory conservation sites etc.

The IBAA Facility is within the screening distances for the following sites:

- Midland Meres and Mosses Phase 1 Ramsar
- Midland Meres and Mosses Phase 2 Ramsar
- Mersey Estuary Ramsar

- Mersey Estuary SPA (or proposed SPA)

There are no point source emissions to air from the ash processing plant, therefore this part of the process does not add to this risk. The water discharge to the MSC has been assessed above using H1. Following this there is no likely significant effect from the IBAA Facility on the above sites. An Appendix 11 was completed and sent for information to Natural England, in line with Environment Agency guidance.

The Environment Agency's screening for local habitat sites and priority/protected species has identified that the west central drain is a migratory route for European Eels. The European Eel has protection under NERC Section 41 & 42, BAP Priority Species, Eels Regulations 2009, Salmon and Freshwater Fisheries Act 1975 (as amended).

While the Operator has considered physical barriers to migratory eels as part of their Environmental Statement, they have not considered the impact of discharges on the water quality of the west central drain and potentially the habitat for the migratory eels.

The discharge to surface water with respect to the MSC, which is the first Water Framework Directive designated stretch the discharge reaches, has been assessed in Section 5.2 above using H1. Before reaching the MSC the discharge flows along the west central drain, which is a non-designated watercourse.

The assessment of the impact on non-designated watercourses can be approached differently to that for designated watercourses. For non-designated water courses an assessment of the discharge can be made against the relevant total EQS. Where the EQS is already exceeded in the receiving water i.e. the west central drain in this case, an assessment is made as to whether the discharge will contribute significantly to this failure. Our assessment of this is presented below with regards the west central drain.

The Environment Agency has assessed the potential impact of the discharge on the west central drain by comparing the expected concentrations in the discharge, following treatment by the reed bed, against the appropriate total EQS values.

This highlights two substances that will potentially have a higher concentration in the discharge than the relevant EQS; chloride and mercury.

Existing chloride levels of water in the west central drain are currently not known, however it is expected that these will be higher than the EQS due to the underlying salinity of the area. The existing chloride concentrations in the MSC are also higher than the EQS, which suggests this is likely to also be the case for the west central drain. We therefore do not expect the discharge to cause a further deterioration in the chloride concentrations in the west central drain or impact on its role as an eel migratory route.

As discussed in Section 5.2 the mercury concentrations in the discharge have been modelled using a worst case scenario, and concentrations would be below the EQS level if the maximum reduction factors of the reed bed are taken into account. There is also likely to be further dilution in the lagoon, reed bed and Pond B1 before the discharge reaches the west central drain. We therefore do not expect the discharge to cause a further deterioration in the mercury concentrations in the west central drain or impact on its role as an eel migratory route.

Consideration to setting limits at the EQS level has been given, however the Operator has also undertaken some background monitoring that indicate the background mercury concentrations in the west central drain are already exceeding the EQS and whereas no background data for chloride is available this is also expected to exceed the EQS as outlined above.

Based on the above assessment the Environment Agency is satisfied that the discharge will not have a significant impact on the west central drain and eel migratory route.

As this assessment is based on discharge concentrations in the samples from the lagoon at the Sheffield site and expected reduction factors from the reed bed it is considered necessary, in order to confirm this assessment and inform the setting of appropriate emission limits and monitoring of the discharge from the IBA Facility, to include a number of pre-operational condition and improvement conditions in the permit (PO3, PO4 and PO5 and IC3 and IC4). This is required to:

- Provide clarification that the section of the west central drain that carries the discharge from the IBA Facility is indeed an eel migratory route.
- Establish a baseline for the habitat and water quality of the west central drain to inform the setting of emission limits.
- Demonstrate the effectiveness of the installed reed bed treatment against the design parameters included in the application.
- Establish a monitoring programme for the discharge to water when the site becomes operational. This will be implemented by IC3.

Site specific baseline monitoring (PO3) and discharge monitoring (IC3) will enable the site specific impact to be assessed and where necessary additional controls put in place. As part of IC3 a review of the sampling data is required to demonstrate that the discharge is not and will not have an impact on eel migration. In the unlikely event that the review does not demonstrate this, further control measures will need to be proposed and approved by the Environment Agency.

## **6. Application of Best Available Techniques**

### **6.1 BAT for Processing of IBA**

The principal aim of IBA treatment is to improve ash quality in order to generate a material that has the potential for safe recovery (e.g. for use as a

secondary aggregate material in road construction) and to mechanically separate and collect the ferrous and non-ferrous metal fractions for further recycling. The use of treated IBA as a secondary aggregate both reduces the use of virgin aggregates and reduces the amount of waste sent to landfill.

IBA is a coarse ash produced from the incineration of municipal solid waste. Depending on the waste burnt, IBA is likely to contain varying quantities of glass, ceramics, brick, concrete and metals in addition to clinker and ash.

Processes for IBA treatment can broadly be categorised as follows:

- Dry Treatment
- Wet Treatment
- Thermal Treatment (vitrification)

The Applicant proposes to use a dry treatment process. Currently this is the most common type of treatment and generally involves the following mechanical processes: screening, size-reduction of oversize material, separation of ferrous and non-ferrous metals and any residual un-burnt material.

The Applicant has chosen the dry process for the following reasons. Wet treatment systems may produce a better quality cleaner aggregate, however they produce additional wash / rinse waters which require management. Thermal treatment systems produce a chemically inert product, but have a very high energy consumption and there are none operating in the UK at the present time.

Both wet and dry treatment systems can be combined with an ash ageing process, which utilises the weak cement-like properties of the ash and through a number of chemical reactions (oxidation, carbonation, hydration) improves its physical properties and chemical properties by stabilising the material and reducing its leaching capacity.

We have assessed the Applicant's proposals for the treatment of incinerator bottom ash, against Agency's guide on the storage and treatment of bottom ash. In summary the Applicant proposes the following:

- The IBA processing site will comprise of three zones:
  - (1) Unprocessed external IBA storage area to receive IBA both directly from the adjacent Ince Refuse Derived Fuel Plant and from other incineration plants. The IBA is inspected and unsuitable unburnt material removed. The stockpiled IBA goes through an ageing process before it is processed.;
  - (2) The IBA Processing Building where the IBA goes through a screen and magnetic separation to remove all metals, separate oversize and grade the IBA; and
  - (3) An external area to store processed Incinerator Bottom Ash Aggregate (IBAA) prior to transportation off-site.

- All waste storage areas are on impermeable surfaces. The drainage system removes surplus water to a lagoon, which is then re-used for the process and dust suppression. Excess water is treated through the on site reed bed before it is discharged to surface water.
- The IBA processing plant will accept up to 250,000 tonnes of IBA per annum predominately from the adjacent Ince Refuse Derived Fuel Plant and with less than 50% coming from other off-site incineration plants, to produce IBAA.
- The total storage of IBAA is 112,000 tonnes.

As a result of our assessment, we are satisfied that the Applicant's proposals are BAT for the ash treatment part of the installation. Aspects of BAT which relate to the Ince Refuse Derived Fuel Plant part of the installation were assessed as part of the original permit application for that part of the installation and as part of the recent variation application (EPR/LP3132FX/V002).

## 6.2 Emissions to the Environment

### 6.2.1 Point source emissions to Air

There are no point source emissions to air from this part of the installation. The processing activities are taking place within an enclosed building. IBA is received in a moist condition from the Ince Refuse Derived Fuel Plant and other incinerators and this prevents dust arisings. An adequate water supply for dust prevention is available on site for damping the processed IBA if required.

Based upon the information in the application we are satisfied that appropriate measures will be in place to prevent and /or minimise emissions to air.

### 6.2.2 Point source emissions to water

IBA storage and processing is carried out on impermeable surfaces. Waste water is treated on site using an RBC system, the treated effluent from this, together with rain water, run-off from IBA stockpiles and water used for damping down stored IBA is collected in a site drainage system which is isolated from the discharge to the west central drain and the MSC and from groundwater.

The drainage system is connected to a lagoon for any entrained particulate material to drop out, prior to treatment via the on site Reed Bed, before it is discharged at point S1.

In section 5.2, (and as part of assessing the impact on habitats in Section 5.4) we have assessed the environmental impact of the proposed emissions to water and concluded that emissions to water from the installation will not give



rise to significant pollution. Therefore, generally, we consider the Applicant's proposals for preventing and minimising the emissions of these substances to be BAT for the Installation.

Based upon the information in the application, together with the controls set through permit conditions. We are satisfied that appropriate measures will be in place to prevent and / or minimise emissions to water.

Table S3.1 of Schedule 3 of the Permit will set out emission limit values and monitoring requirements for emissions to water from the Installation as agreed in accordance with PO5. This will be consolidated into the permit at the first appropriate opportunity.

#### 6.2.3 Emissions to sewer

There are no point source discharges to sewer. Emissions are to water as described in section 6.2.2 above.

#### 6.2.4 Fugitive emissions

The Applicant has submitted details of their dust management measures to prevent and minimise off site emissions of dust in response to the Schedule 5 notice dated 22 December 2011. Key proposals within the dust management measures are:

- Processing activities are carried out in a building
- Facilities for damping down of stock piles of processed and unprocessed IBA.

The dust management measures included in the schedule 5 response have been incorporated into the permit as an operating technique in Table S1.2 of Schedule 1.

The Applicant has submitted proposals to demonstrate that the plant will be designed in such a way as to prevent the unauthorised and accidental release of polluting substances into soil, surface water and groundwater. This includes:

- Stockpiles of untreated and treated ash are stored on impermeable surfaces.
- The site drainage system is connected to a lagoon and not directly to water or sewer.
- The lagoon and reed bed have an impermeable lining.

Based upon the information in the Application we are satisfied that appropriate measures will be in place to prevent and / or minimise fugitive emissions, which will be regulated through permit conditions 3.2.1 to 3.2.3.

#### 6.2.5 Odour

IBA ash treatment is an inherently non-odorous process.

Based upon the information in the Application we are satisfied that appropriate measures will be in place to prevent and / or minimise odour, which will be regulated through permit conditions 3.3.1 and 3.3.2.

#### 6.2.6 Noise and vibration

The proposed facility is located on Plot 4 of the Ince Park development site, which will be primarily an industrial/commercial area. The site is approximately 0.9km from the nearest residential receptors.

The Applicant has included the following noise mitigation measures in the Application:

- All IBA treatment processes are to be carried out within an enclosed building
- Any outdoor activities will be limited to the operating hours of 7am-7pm
- There will be no vehicle movements in/out at night time

The Application contained a revised chapter from the Environmental Statement, which updated the noise assessment for the site following the proposed change of use from the previously consented Timber Reprocessing facility to the IBA Processing Facility. The noise assessment identified local noise sensitive receptors, potential sources of noise at the proposed plant and noise attenuation measures. Measurements were taken of the prevailing ambient noise levels to produce a baseline survey and an assessment was carried out in accordance with BS4142 to compare the predicted plant rating noise levels with the established background levels. The updated noise assessment concluded that the noise impacts for the IBA Facility are shown to be consistent with the previously consented use of the site as a Timber Reprocessing Facility.

Based upon the information in the Application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise noise and vibration and to prevent pollution from noise and vibration. As a result we consider it unlikely that the plant will result in a level of noise nuisance likely to give rise to complaint.

#### 6.3 Monitoring

The monitoring of IBA for the purposes of compliance with the requirements of the Waste Incineration Directive is set out in the Refuse Derived Fuel Plant permit and described in the Ince Refuse Derived Fuel Plant variation decision document (EPR/LP3132FX/V002).

Sampling and analysis of the processed ash may be required depending on the end use of the material. End uses of processed IBA are not controlled by this permit but through other environmental legislation. The Operator may be required to carry out monitoring to meet the requirements of this legislation. However these controls are not duplicated within this permit.

For emissions to water, baseline monitoring requirements will be agreed as part of PO3 and emission limits and an operational monitoring program will be agreed as part of PO5, which will be undertaken in accordance with IC3.

Further details and justification of the inclusion of these pre-operational and improvement conditions is provided in Section 5.4 above.

Based on the information in the Application and the requirements set in the conditions of the permit we are satisfied that the Operator's techniques, personnel and equipment will have either MCERTS certification or MCERTS accreditation as appropriate.

#### 6.4 Reporting

We have specified the reporting requirements in Schedule 5 of the Permit either to ensure data is reported to enable timely review by the Environment Agency and to ensure compliance with permit conditions.

## **7 Other legal requirements**

In this section we explain how we have addressed other relevant legal requirements, to the extent that we have not addressed them elsewhere in this document, or as part of the variation decision document for the incineration plant (EPR/LP3132FX/V002).

The purpose of IBA treatment is to generate a material which is inert, does not negatively affect water bodies, and has the potential for safe recovery, e.g. as a soil substitute or in road construction. It is important to recognise that these recovered materials will continue to be considered as a waste material including for the purpose of any subsequent re-use.

The Environment Agency is currently engaged in work to establish 'product specifications' for treated IBA. The purpose of such a product specification would be to provide a test for treated IBA to cease to be considered a waste material.

In the interim, the Environment Agency has published a position statement on the status of these materials and how the requirements of waste regulation will be applied to them.

All other relevant legal requirements were addressed as part of the original permit application for the Ince Refuse Derived Fuel Plant or are described where appropriate in the decision document for the variation to the Ince Refuse Derived Fuel Plant (EPR/LP3132FX/V002).

## ANNEX 1: Pre-Operational Conditions

Based on the information on the Application, we consider that we need to impose pre-operational conditions. These conditions are set out below and referred to, where applicable, in the text of the decision document. We are using these conditions to require the Operator to confirm that the details and measures proposed in the Application have been adopted or implemented prior to the operation of the Installation.

Reference	Pre-operational measures
PO1	Prior to the commencement of commissioning, the Operator shall send a summary of the site Environment Management System (EMS) to the Environment Agency and make available for inspection all documents and procedures which form part of the EMS. The EMS shall be developed in line with the requirements set out in Section 1 of How to comply with your environmental permit – Getting the basics right. The documents and procedures set out in the EMS shall form the written management system referenced in condition 1.1.1 (a) of the permit.
PO2	Prior to the commencement of commissioning, the Operator shall submit a written report to the Agency detailing the waste acceptance procedure to be used at the site. The waste acceptance procedure shall include the process and systems by which wastes unsuitable for treatment at the site will be controlled. The procedure shall be implemented in accordance with the written approval from the Agency.
PO3	The Operator shall undertake eel and water quality monitoring to establish a baseline for further assessment of the impact of the discharge. The scope, location and duration of this monitoring will be agreed with the Environment Agency and will include one migration period before the discharge commences. The Operator shall review all sampling data and submit a report to the Environment Agency.
PO4	Prior to the commencement of commissioning, the operator shall submit a report outlining the proposal for the installation and commissioning of the reed bed. This shall include a proposal for demonstrating the performance of the reed bed against the design parameters. The scope and timescales of the proposal shall be agreed with the Environment Agency.
PO5	<p>The Operator shall submit to the Agency for approval proposals for a monitoring program to assess the impact on water quality and eels in the west central drain from discharges of site effluent once the site is operational. The proposals shall include, but not be limited to;</p> <ul style="list-style-type: none"> <li>• Monitoring duration</li> <li>• Parameters to be monitored</li> <li>• Reference period</li> <li>• Monitoring frequency</li> <li>• Limits, taking into account PO3</li> <li>• Monitoring standard or method</li> </ul> <p>The Environment Agency will assess the proposals and, once approved any compliance limits shall be incorporated into table S3.1. The monitoring program will be implemented in accordance with IC3.</p>

## ANNEX 2: Improvement Conditions

Based in the information in the Application we consider that we need to set improvement conditions. These conditions are set out below - justifications for these is provided at the relevant section of the decision document. We are using these conditions to require the Operator to provide the Environment Agency with details that need to be established or confirmed during and/or after commissioning.

Reference	Improvement measure	Completion date
IC1	The Operator shall submit a written report to the Environment Agency on the implementation of its Environmental Management System and the progress made in the accreditation of the system by an external body or if appropriate submit a schedule by which the EMS will be subject to accreditation.	Within 4 months of the completion of commissioning.
IC2	The Operator shall submit a written report to the Environment Agency on the commissioning of the installation. The report shall summarise the environmental performance of the facility as installed against the design parameters set out in the Application. The report shall also include a review of the performance of the facility against the conditions of this permit and details of procedures developed during commissioning for achieving and demonstrating compliance with permit conditions.	Within 4 months of the completion of commissioning.
IC3	<p>The Operator shall undertake the monitoring program agreed in PO5. The Operator shall review the data gathered from the monitoring program and shall submit a report to Agency detailing the findings and conclusions from the review.</p> <p>The review of the sampling data is required to demonstrate that the discharge is not and will not have an impact on eel migration. Where the review does not demonstrate this, further control measures should be proposed. This may include but not be limited to the consideration of the following:</p> <ul style="list-style-type: none"> <li>• enclosure of the IBA stockpiles</li> <li>• further treatment of the water prior to its discharge</li> <li>• alternative discharge routes avoiding the eel migration routes</li> </ul> <p>The Environment Agency will assess the data and the report and, once approved any compliance limits and future monitoring requirements shall be incorporated into table S3.1. If further control measures are required these will be will be implemented as approved by the Environment Agency.</p>	Within 12 months of the completion of commissioning.
IC4	The operator shall submit a report, for approval by the Environment Agency, detailing the installation and commissioning of the reed bed treatment as	As agreed with the Environment Agency under PO4 in Table S1.4.

	<p>agreed under PO4. This should compare the installed reed bed performance against the design parameters set out in the application, and in particular the pollution reduction factors. Where these differ, a revised H1 assessment shall be included as part of the report to demonstrate that the discharge will not have a significant environmental impact on the receiving waters.</p>	
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## **ANNEX 3: Consultation Responses**

### **A) Advertising and Consultation on the Application**

The Application has been advertised and consulted upon in accordance with the Environment Agency's Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our decision is summarised in this Annex. Copies of all consultation responses have been placed on the Environment Agency and Local Authority public registers.

The Application was advertised on the Environment Agency website from 12 December 2011 to 27 January 2012 and in the Chester Chronicle on 22 December 2011. Copies of the Application were placed in the Environment Public Register at Appleton House and the Cheshire West and Chester Council Public Register at Wyvern House, Winsford.

The following statutory and non-statutory bodies were consulted: -

- Local Environmental Protection Department (Cheshire West and Chester Council)
- Food Standards Agency
- H&S Executive
- Primary Care Trust (West Cheshire PCT)
- Planning Authority (Cheshire West and Chester Council)
- Health Protection Agency
- Peel Holdings

Only those consultation responses which refer to the operation of the IBA plant are summarised here. Consultation responses on the variation to the incineration process can be found in Annex 1 of the decision document for the Ince Refuse Derived Fuel variation application (EPR/LP3132FX/V002).

#### **1) Consultation Responses from Statutory and Non-Statutory Bodies**

<b>Response Received from Health Protection Agency</b>	
Brief summary of issues raised:	Summary of action taken / how this has been covered
Based on the application documents sent to CRCE, this site does not present any obvious cause for concern to public health providing it is well managed and maintained as well as the relevant legislation and sector guidance notes are complied with.	No action required.

<b>Response Received from NHS Western Cheshire</b>	
Brief summary of issues raised:	Summary of action taken / how this has been

	covered
<p><b>Transport:</b></p> <p>As a result of the proposed developments in this area, transport is estimated to increase by 1.5-5%. We would like to highlight that an increase above 3% is noticeable. Such an increase has potential in impact in terms of increasing the rate of accidents and decreasing the air quality in the vicinity of the local roads. I would like to request that in the consideration of this application, the Local Authority are engaged to help quantify any potential increase in accidents, and assess the impact on the local air quality based upon existing monitored levels, that such an increase in traffic movements may have within the locality. Until such information is available, we are in no position to comment further on the impact that these factors may have upon human health.</p>	<p>The Local Authority Planning Department will have considered the impacts relating to increased traffic movements from the proposed development as part of the planning process.</p> <p>No further action is required by the Environment Agency.</p>
<p><b>Noise:</b></p> <p>There is estimated to be no long-lasting increase in noise over and above current levels or those already agreed under planning consent for possible developments on the same Ince site. There appear to be some provision for mitigation measures expected to be put in place for the increase in noise during the construction phases.</p> <p>There is expected to be noise generate from operational traffic, once the plant is operational, at the A5117/Poole Lane junction. It is understood that engineering work is proposed in relation to this junction and we wish to highlight that local Authority consideration should be gained in response to these proposals in terms of both noise and traffic disruption in the area. In addition, Holme Farm can expect an increase in operational noise.</p> <p>The background noise from the current industrial sites within the area is already quite high. Although the proposed development does not highlight an increase beyond existing levels, consideration should be given to the variety of noises audible locally, the natural variations in noise levels as a result of environmental and weather conditions and uncertainty in accurately predicting the impact of noise as a result of these variations. I would like to highlight the 2011 WHO Document: Burden of disease from environmental noise, Quantification of healthy life years lost in Europe which outlines the potential impact of noise, including the Psychosocial concerns and impact upon human health that moderate and perceived noise increases can have upon</p>	<p>Based upon the information in the Application we are satisfied that appropriate measures will be in place to prevent or where that is not practicable to minimise noise and vibration and to prevent pollution from noise and vibration. As a result we consider it unlikely that the plant will result in a level of noise nuisance likely to give rise to complaint. See Section 6.2.6 above.</p> <p>The standard noise permit condition has been included in the permit.</p> <p>As above, the Local Authority Planning Department will have considered the impacts relating to increased traffic movements from the proposed development as part of the planning process.</p> <p>No further action is required by the Environment Agency.</p>



health.	
<b>Dust:</b> Within the application documentation, dust is not highlighted as likely to cause any problems off-site, and that mitigation measures can be expected to be put in place.	The Environment Agency has noted this comment.
<b>Health:</b> A comment was made on the general level of health and life expectancy in the area.	The Environment Agency has considered the impact of emission on human health in Section 5.3. Please also note the comment and conclusion from the Health Protection Agency above.  No further action is required by the Environment Agency.

## 2) Consultation Responses from Members of the Public and Community Organisations

- Local MP, Councillors and Parish / Town / Community Councils

No representations were received from Local MPs, Councillors or Parish / Town / Community Councils.

- Community and Other Organisations

No representations were received from community and other organisations.

- Individual Members of the Public

No responses were received from individual members of the public.

## B) Advertising and Consultation on the Draft Decision

This section reports on the outcome of the public consultation on our draft decision carried out between 30 March 2012 and 2 May 2012.

<b>Response Received from Helsby Parish Council</b>	
Brief summary of issues raised:	Summary of action taken / how this has been covered
Helsby Parish Council has one item that we would like clarified regarding quantitative sampling analysis of perimeter dust being carried out via sticky discs. This procedure is mentioned in section 2.4.1 of the supporting information provided as part of the application documentation but it is not mentioned within the draft decision.	The decision document highlights the key measures the operator has proposed for dust management. There are other elements to their dust management, which are outlined in full in the application and Schedule 5 response. This includes quantitative dust sampling.  The response to Question 8 of the Schedule

The Council expressed its concern during the planning application process about the potential for fugitive particulate emissions affecting our residents. We appreciate that since then there has been considerable discussion on this topic, encompassing additional facilities at Ince Resource Recovery Park, and that the concept of environmental monitoring at residential locations is progressing. However, we consider these developments do not remove the need for safeguards such as dust sampling analysis at the perimeter of the IBAA facility.

The decision document notes that dust management measures are incorporated into the permit within Table S1.2 of Schedule 1. Table S1.2 refers to the response to Schedule 5 notice dated 22/12/11 and a memorandum dated 27/02/12 (Ince Marshes IBAA Facility - Points for Clarification, ref S0986-0320-0098JRS). Unfortunately neither of these documents is available as part of the public consultation so it is not clear whether they cover perimeter dust sampling.

Please can you clarify this point, and if necessary include a requirement within the permit to carry out quantitative sampling analysis of perimeter dust via sticky discs, as mentioned in the applicant's supporting documentation for the permit.

5 notice states the following:

*"Quantitative sampling analysis of perimeter dust will be carried out via sticky discs to emissions monitor emissions to air. This monitoring equipment will be used for monitoring, at an agreed frequency with the Environment Agency, dust quantities in the vicinity of the IBAA Facility"*

This response is already incorporated within the permit through Table S1.2 – Operating techniques.

The response to the Schedule 5 notice, received 13/01/12 is available on the public register.

No further action is required by the Environment Agency.