

Environmental Permitting update

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Scope & aim

- ⇒ Update on the waste exemption review
- ⇒ Update on IED permit review
- ⇒ Key findings for sector
- ⇒ Current compliance issues
- ⇒ Future for BAT & BAT-AELs
- ⇒ Initial key findings from fire prevention audits

Waste Exemptions

- Defra is working towards laying regulations by the end of the year with a view to them coming into force around May 2020.
- 10 exemptions will be tightened or withdrawn.
- T4 (bailing, sorting, shredding) and S2 (storage) -
Headline change; Limit for paper & cardboard may reduce from 15,000/year to 5,000 tonnes/year.

Update on IED permits

- ⇒ improvement conditions responses being reviewed
- ⇒ Most commonly BAT 5 (freshwater usage)
- ⇒ BAT 6 & 53 (energy usage)
- ⇒ BAT 45 & 50 (BAT AELs)
- ⇒ Compliance window is underway (2019)
- ⇒ 2 derogations issued (time limited)

Microscopy checks?



Where is there room for improvement?

- ⇒ Some Operators don't fully understand where process chemistry may be adding to COD and N & P loads in particular
- ⇒ Many sites appear in need of better nutrient control/management at ETP
- ⇒ Links to better microbiological understanding
- ⇒ Often compliance can be obtained by improvements at the mill (**BAT is prevention**)
- ⇒ Need to understand nitrogen cycle (mass balance)

Eutrophication in action



UK BAT?

- ➔ Still lots of uncertainty around.....
- ➔ Planning for a version of Seville process
- ➔ Consultation originally planned for summer 2019....
- ➔ Following updates are taken from a recent Defra conference.
- ➔ Gov't guidance doc on UK BAT is:

<https://www.gov.uk/government/publications/industrial-emissions-standards-best-available-techniques-if-theres-no-brexit-deal/industrial-emissions-standards-best-available-techniques-if-theres-no-brexit-deal>

Withdrawal from the EU

- The Government is committed to maintaining environmental standards after we leave the EU
- Aim to maintain policy stability for industry
- We will continue to apply the existing successful model of integrated pollution control as we exit the EU
- We will ensure there is a clear process for determining future BAT conclusions for UK industrial emissions that broadly maintains a consistent approach with the Industrial Emissions Directive
- We will maintain an effective regulatory system for the safe management and control of chemicals under REACH

Industrial emissions policy following EU Exit

- We will continue to apply the existing successful model of integrated pollution control.
- Technical Notice in the event of no deal set out that existing BAT conclusions will be transposed and we will develop a system for setting UK BAT in the future
- **Future UK BAT regime:**
 - •Collaborative –UK approach
 - •Environment regulators remain instrumental to the process
 - •Engagement with industry and other stakeholders will be even more important
 - •We will look at EU approach
 - In the event of a negotiated exit we may follow a similar approach for BAT determination





Key findings from Fire Prevention audits

- ➔ Some good practice:
- ➔ Fire suppression systems
- ➔ Use of thermal imaging cameras linked to fighting systems
- ➔ Request visits by FRS & site plan review

Key findings from Fire Prevention audits

- ➔ Some not so good practice:
- ➔ Lack of training on fire management
- ➔ Lack of testing on site fire fighting equipment
- ➔ Lack of knowledge on site drainage
- ➔ Dust management & control at tissue mills still lacking
- ➔ Variability in Permits to carry out hot works
- ➔ Lack of pressure testing of fire fighting circuits

Key findings from Fire Prevention audits: issues

- ➔ Lack of engagement from FRS locally and HSE?
- ➔ What is acceptable frequency of testing for fire fighting equipment (insurance Co's)
- ➔ Variable frequencies of exercises
- ➔ Variable criteria for hot works inspections
- ➔ How transferable are our findings for mills across to waste storage facilities?

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https://www.manchestereveningnews.co.uk/news/greater-manchester-news/carrington

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Live: 50 firefighters tackle large blaze at paper mill in Trafford

Residents close to the scene between Partington and Carrington are being advised to keep doors and windows closed

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By **Chris Slater & Helen Johnson**
UPDATED 18:50, 12 APR 2019

NEWS



Windows taskbar with icons for Internet Explorer, File Explorer, Chrome, Outlook, Adobe Reader, Word, and PowerPoint. System tray shows 100% battery, network, volume, and date/time: 14:29 03/06/2019.

Next Steps

➔ Talk to your Inspector.....