

Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2010 (as amended)

Decision document recording our decision-making process following review of a permit

The Permit number is: EPR/BL5288IC
The Operator is: Harsco Metals Group Limited
The Installation is: Scunthorpe Integrated Iron and Steel Works
This Variation Notice number is: EPR/BL5288IC/V004

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication by the European Commission of updated decisions on BAT conclusions.

We have reviewed the permit for this installation against the revised BAT Conclusions for the iron and steel production industry sector published on 8th March 2012. This is our decision document, which explains the reasoning for the consolidated variation notice that we are issuing.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. This review has been undertaken with reference to the decision made by the European Commission establishing best available techniques (BAT) conclusions ('BAT Conclusions') for Iron and Steel Production as detailed in document reference 2012/135/EU. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position. It also provides a justification for the inclusion of any specific conditions in the permit that are in addition to those included in our generic permit template.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. It also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and philosophy and with other permits issued to installations in this sector. Although the wording of some conditions has changed, while others have disappeared because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the Permit in any way. In this document we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future.

How this document is structured

1. Our proposed decision
2. How we reached our decision
3. The legal framework

Annex 1- Review of operating techniques within the Installation against BAT Conclusions

Annex 2 - Improvement Conditions

Annex 3 - Review and assessment of changes that are not part of the BAT Conclusions
derived permit review

1 Our decision

We have decided to issue the Variation Notice to the Operator. This will allow it to continue to operate the Installation, subject to the conditions in the Consolidated Variation Notice that updates the whole permit.

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

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant Annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of “tailor-made” or installation-specific conditions, or where our Permit template provides two or more options.

2 How we reached our decision

2.1 Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 60(1) of the Environmental Permitting (England and Wales) Regulations 2010 (a Regulation 60 Notice) on 13/09/2013 requiring the Operator to provide information to demonstrate how the operation of their installation currently meets, or will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Notice also required that where the revised standards are not currently met, the operator should provide information that

- Describes the techniques that will be implemented before 08/03/2016 which will then ensure that operations meet the revised standard, or
- justifies why standards will not be met by 08/03/2016, and confirmation of the date when the operation of those processes will cease within the installation or an explanation of why the revised BAT standard is not applicable to those processes, or
- justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised standard described in the BAT Conclusions.

Where the Operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT AEL) described in the BAT Conclusions Document, the Regulation 60 Notice requested that the Operator make a formal request for derogation from compliance with that AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 60 Notice response from the Operator was received on 31/01/14.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review

The Operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 60 Notice response that appears to be confidential in relation to any party.

2.2 Review of our own information in respect to the capability of the installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous regulatory activities with the facility we have no reason to consider that the operator will not be able to comply with the techniques and standards described in the BAT Conclusions.

2.3 Addition of newly prescribed activities

When the Industrial Emissions Directive was introduced into the regulatory framework in England, via amendment to the Environmental Permitting Regulations in 2012, the description of activities defined as installations changed to include for the first time some activities that take place at this facility. These activities have taken place at this facility for many years and have been regulated through this permit principally as activities directly associated to the primary activity of making and refining steel.

The revisions to the descriptions of Installations now means that the treatment of ashes and slags and the shredding of metals are listed scheduled activities in their own right and need to be included in the permit as such.

The Operator needed to apply to include these activities in their permit. An administrative variation application was therefore submitted in October 2015 seeking the inclusion of these new activities. The application was publicised in accordance with our Public Participation Statement. No comments were received from members of the public or other interested parties.

We consider that that application was in the correct form and contained sufficient information for us to determine whether those activities could be included in the permit as part of the review process

We believe the operator has taken steps to prevent pollution of the environment or harm to human health from these particular activities, we consider the best available techniques are being used to manage these waste streams and the activities can be included in the permit as requested.

3 The legal framework

The Consolidated Variation Notice will be issued, under Regulations 18 & 20 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 regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Consolidated Variation Notice, it will ensure that the operation of the Installation 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.

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusions for the Production of Iron Steel, were published by the European Commission on 8th March 2012. There are 95 BAT Conclusions of which only the following are relevant:

- All of Section 1.1 General BAT Conclusions that is BAT conclusions 1 to 18
- BAT Conclusion 52 - BAT for coke grading and handling is to prevent or reduce dust emissions
- BAT Conclusion 68 - BAT is to prevent waste generation from blast furnaces
- BAT Conclusion 69 - BAT for minimising slag treatment emissions
- BAT Conclusion 79 - BAT for on-site slag processing is to reduce dust emissions.
- BAT Conclusion 82 - BAT is to prevent waste generation

This annex provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA Not Applicable
CC Currently Compliant
FC Compliant in the future (within 4 years of publication of BAT conclusions)
NC Not Compliant

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
General BAT			
1	BAT is to implement and adhere to an environmental management system (EMS)	CC	An environmental management system (EMS) that has been independently certified as conforming to the requirements of ISO14001 is in place. The features set out in the BAT conclusion are all requirements of ISO14001. This ensures BAT is achieved in relation to all of the above points. The EMS is regularly audited by Lloyds Register Quality Assurance Limited and via internal audit systems.
2	BAT is to reduce thermal energy consumption by using a combination of techniques.	CC	Electricity, gas and water are supplied through Tata Steel (now Longs Steel). Energy reduction programme is now in place. Carbon footprint reduction objectives being set and managed through company objectives and targets. BAT is achieved.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
3	BAT is to reduce primary energy consumption by optimisation of energy flows & optimised utilisation of the extracted process gases such as coke oven gas, blast furnace gas & basic oxygen gas.	NA	Utilisation of the extracted process gases such as coke oven gas, blast furnace gas and basic oxygen is not undertaken.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
4	BAT is to use desulphurised and dedusted surplus coke oven gas and dedusted blast furnace gas and basic oxygen gas (mixed or separate) in boilers or in combined heat and power plants to generate steam, electricity and/or heat using surplus waste heat for internal or external heating networks, if there is a demand from a third party.	NA	This operation is undertaken by the main operator
5	BAT is to minimise electrical energy consumption by using one or a combination of the following techniques: I. power management	CC	As described above in BAT2 electricity is supplied by the Iron & Steel Works. However, energy reduction programme is now in place. One of the main objectives is to identify energy efficiency opportunities and increase energy consumption awareness of our employees. Energy Reduction is an on-going process. BAT is achieved.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	<p>systems</p> <p>II. grinding, pumping, ventilation and conveying equipment and other electricity-based equipment with high energy efficiency.</p>		
6	<p>BAT is to optimise the management and control of internal material flows in order to prevent pollution, prevent deterioration, provide adequate input quality, allow reuse and recycling and to improve the process efficiency and optimisation of the metal yield.</p>	CC	<p>Management of wastes is underpinned by a material flows hierarchy, first is prevention and minimisation at the source, then reuse or recycling of materials and by-products to avoid waste arisings. Internal material flows are also carefully controlled to prevent deterioration and to provide appropriate input quality. The small fractions of residues that have no economic use are disposed of at a customer internal landfill site.</p> <p>Additional measures to minimise pollution arising from materials storage, handling and transport are detailed in BAT 11. Measures to maximise the internal and external use of material residues are detailed in the responses to BAT 8 and BAT 9.</p> <p>BAT is achieved.</p>
7	<p>BAT is to select appropriate scrap qualities and other raw materials. Scrap sorting to minimise the</p>	CC	<p>The main operator of the Iron and Steel Works operates the main scrap storage area. They are responsible for scrap purchase and for dealing with supplier. However, Harsco has the following scrap management controls are in place:</p> <ul style="list-style-type: none"> • Scrap is recovered using a rotating electro magnet; therefore only ferrous metals are picked up. Visual inspection is carried out.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	<p>risk of including hazardous or non-ferrous contaminants, particularly polychlorinated biphenyls (PCB) and oil or grease.</p>		<ul style="list-style-type: none"> • Harsco Metals and Minerals Scunthorpe is covered by a quality management system that has been independently certified as conforming to the requirements of ISO 9001, the international environmental management systems standard. Part of quality system to check the scrap. Please, find certificate attached. • Harsco Metals receives scrap for the BOS plant. There are procedures in place for monitoring composition and standard of scrap and to exclude unsuitable scrap. When scrap does not meet the standard of the BOS criteria, it is quarantined. • Throughout the scrap handling process up to the point of charging into the BOS vessels, there is segregation of scrap types into clearly defined compositions/qualities/types. • Contamination within the scrap e.g. plastic is minimised initially through Iron and Steel Works scrap acceptance criteria but also through the Iron and Steel Works scrap inspection procedures and through the scrap bays and loading to the BOS vessels. • Longs Steel (Formerly TATA)'s Radioactivity monitors are located on the scrap receipt weigh bridges, through which the external scrap lorries, must pass before discharging scrap on site. There are also TATA's radioactivity monitors at the scrap bays. • A training programme in place that operator has to pass, built up from the UK Scrap manual. <p>BAT is achieved.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
8	BAT for solid residues is to use integrated techniques and operational techniques for waste minimisation by internal use or by application of specialised recycling processes (internally or externally).	NA	Management of process residues such as by-products and wastes is undertaken by the main operator of the Iron and Steel Works. BAT is not applicable.
9	BAT is to maximise external use or recycling for solid residues which cannot be used or recycled according to BAT 8, wherever this is possible and in line with waste regulations. BAT is to manage in a controlled manner residues which can neither be avoided nor	CC	All material taken to Harsco is recyclable BAT is achieved.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	recycled.		
10	BAT is to use the best operational and maintenance practices for the collection, handling, storage and transport of all solid residues and for the hooding of transfer points to avoid emissions to air and water.	CC	<p>Conveyors are covered and screen houses, briquetting plant is inside a building. Transfer point is at each screen house and these are covered. Solid residues are treated in the same way as raw materials and the response given in respect of BAT 11 applies equally to BAT 10.</p> <p>BAT is achieved.</p>
11	BAT is to prevent or reduce diffuse dust emissions from materials storage, handling and transport	CC	<p>The EMS of the steelworks also includes an associated diffuse dust action plan or Air Quality Management Plan; Daily observations are conducted by Harsco Metals and Minerals to proactively manage sources of diffuse dust emissions.</p> <p>Stockpiles are kept to minimum. Natural terrain provides some protection from winds. Water sprays control the moisture content of the material. Operator training includes the requirement to pay careful attention when moving material in order to prevent unnecessary dust emissions. There are several work instructions and training programs in place.</p> <p>Site roads are swept regularly and the haul road is dampened by water spray when conditions dictate its use necessary.</p> <p>A combination of fixed and mobile dust suppression is utilised.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			<p>Water bowser is deployed on all stockyard roads when required i.e. during dry weather. There are procedures for the transport of raw materials by dumper truck in order to minimise spillages. In addition, reclaiming of any material spillages is carried out frequently due to the high cost of the materials as well as the environmental benefits associated with removing the material.</p> <p>The speed limit on the integrated iron and steel works site roads is 25 mph as a maximum. However, further reductions are made to 10 mph where the potential for dust lift is greater. Monitoring is carried out and reported according to permit operations (fume booth).</p> <p>BAT is achieved.</p>
12	BAT for waste water management is to prevent, collect and separate waste water types, maximising internal recycling and using an adequate treatment for each final flow.	CC	<p>No potable water is used. All water is supplied by the main operator of the steel works and is from their rain water capture system. The water is used in a mobile water bowser for dampening the stockpiles and for dampening cooled slag prior to tipping into stockpiles. No waste waters are produced</p> <p>BAT is achieved.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
13	BAT is to measure or assess all relevant parameters necessary to steer the processes from control rooms by means of modern computer-based systems in order to adjust continuously and to optimise the processes online, to ensure stable and smooth processing, thus increasing energy efficiency and maximising the yield and improving maintenance practices.	CC	All major processes are controlled by means of computer-based systems to ensure safe operation and to achieve the most efficient overall process. BAT is achieved.

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
14	<p>BAT is to measure the stack emissions of pollutants from the main emission sources from all processes included in the Sections 1.2 – 1.7 whenever BAT-AELs are given and in process gas-fired power plants in iron & steel works. BAT is to use continuous measurements (CEMS) at least for:</p> <ul style="list-style-type: none"> • emissions of NO_x from power plants • dust emissions from large EAF's. <p>For other emissions, BAT is to consider using CEMs depending on the mass flow and emission characteristics.</p>	NA	<p>BAT is not applicable. The operations covered by sections 1.2 – 1.7 of the BAT conclusions document are undertaken by the main operator of the Iron and Steelworks.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
15	For relevant emission sources not mentioned in BAT 14, BAT is to measure the emissions of pollutants from all processes included in the Sections 1.2 – 1.7 and from process gas-fired power plants within iron and steel works as well as all relevant process gas components/pollutants periodically and discontinuously.	CC	Annual periodic monitoring is undertaken on emission points A1 - No 5 slab slitter fume extraction unit & A2 - Yarborough metal recovery dust abatement unit BAT is achieved

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
16	<p>BAT is to determine the order of magnitude of diffuse emissions from relevant sources by the methods</p> <ul style="list-style-type: none"> • Direct measurement methods where the emissions are measured at the source itself. • Indirect measurement methods where the emission determination takes place at a certain distance from the source; • Calculation with emission factors. 	CC	<p>Direct emission measurements have been undertaken of fugitive releases for the fume booth. Osiris dust monitors installed at the Coke Crushing Plant and Metal Recovery Plant in 2015. Results from offsite monitoring at Santon are used a check. An Annual Fugitive Emissions Improvement Summary Report is submitted on an annual basis.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
17	BAT is to prevent pollution upon decommissioning	CC	<p>A "closure plan" is in place which falls in line with Longs Steel (formerly TATA) steels decommissioning process as provided at permit application. It considers both the site health & safety and environmental issues addressed within the overall remit of the Construction (Design and Management) Regulations 1994 (COM), and the specific environmental issues addressed by Company environmental, health & safety specifications and guidance notes.</p> <p>BAT is achieved</p>
18	BAT is to reduce noise emissions from relevant sources in the iron and steel manufacturing processes	CC	<p>Noise from process operations is largely controlled by enclosure within buildings and the implementation of procedures to ensure that doors are opened only when necessary so that the noise is contained as much as possible. Complaints of noise from the local community are recorded and investigated to try to identify the source of the noise; if noise is attributed to an onsite source then action is taken to rectify the issue. According to the current and historical records there have been no complaints in relation to noise attributed to the Harsco operations.</p> <p>BAT is achieved</p>
BAT Conclusions for Sinter Plant			
BAT conclusions 19 to 32 inclusive	The sinter plant is operated by Longs Steel (formerly TATA). Therefore, BAT Conclusions 19 to 32 inclusive are not	NA	BATC19 to 32 inclusive are not relevant

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	relevant for this installation.		
BAT Conclusions for Pelletisation Plants			
BAT Conclusions 33 to 41 inclusive	There are no Pelletisation plants in the U.K.	NA	BATC 33 to 41 are not relevant
BAT Conclusion for Coke Oven Plants			
BAT Conclusions BAT42-51 and 53-58	Are not relevant as are operation of the coke oven plants principal operator	NA	With the exception of BATC52, BATC 42-51, 53-58 are not relevant
52	<p>BAT for coke grading and handling is to prevent or reduce dust emissions by using the following techniques in-combination:</p> <p>I. use of building or device enclosures;</p> <p>II. Efficient extraction</p>	CC	<p>BATI is achieved as the coke conveyor systems are enclosed and transfers points are also covered. The screening operation is fully enclosed. Earth bunds have been built around the plant. The belt ends on static processing plants have been encapsulated to minimise potential for fugitive dust emission at material drop points. A water bowser with a water cannon is used to spray material heaps.</p> <p>BATII there is no associated extraction system and as such no emission point to set the BAT AEL. Harsco maintain that control measures in place achieve an equivalent level of environmental protection.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	<p>and subsequent dry dedusting.</p> <p>The BAT-associated emission level for dust is <10 mg/Nm³, determined as the average over the sampling period (spot measurement, for at least half an hour).</p>		<p>We have set an improvement condition to provide further evidence that this is the case, stipulating the use of onsite ambient air quality monitoring as demonstration.</p>
BAT Conclusions for Blast Furnaces			
BAT Conclusions 59-74 inclusive	The blast furnaces are operated by Longs Steel (formerly TATA)	NA	With the exception of BATC 68 IV and BATC69 BAT Conclusions 59-74 are not relevant for this installation
68	<p>BAT is to prevent waste generation from blast furnaces by using one or a combination of the f techniques I-IV</p> <ul style="list-style-type: none"> I. storage for recovery II. on site recycling III. hydrocyclonage of sludge 	CC	<p>BAT IV is relevant. Slag treatment, by means of granulation is undertaken and granulated slag is used in the cement industry.</p> <p>BAT is achieved</p>

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	IV. slag granulation		
69	BAT for minimising slag treatment emissions is to condense fume if odour reduction is required	CC	No odour reduction is required – condensing slag granulator is not required BAT is achieved
BAT Conclusions for Basic Oxygen Steelmaking and Casting			
BAT Conclusions 75-78 and 80-86 inclusive	Basic Oxygen Steelmaking and Casting is undertaken by the main operator Longs Steel (formerly TATA).	NA	With the exception of BAT C79 BATC 75-78, 80-86 inclusive are not relevant for this part of the installation as they are undertaken by the main operator, Longs Steel (formerly TATA).
79	BAT for on-site slag processing is to reduce dust emissions by using one or a combination of the following techniques: I. efficient extraction of dust emissions from the slag crusher and use of screening	CC	Slag screening, is not extracted but is covered, metal recycling area is covered but not extracted. Slag is transported by shove/loaders or dumpers depending of transporting distance required to minimise environmental impact. Fixed dust suppression system is installed a reception hopper and mobile fog cannons which can be deployed to cover conveyor and drop paints. BAT achieved

BAT Conclusion No	Summary of BAT Conclusion requirement	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	devices with subsequent offgas cleaning, if relevant II. transport of untreated slag by shovel loaders III. extraction or wetting of conveyor transfer points for broken material		
BAT Conclusions for Electric Arc Furnace Steelmaking and Casting			
87-95	There are no electric arc furnaces at the site	NA	BAT conclusions 87-95 are not applicable.

Where relevant and appropriate, we have incorporated the techniques described by the Operator in their Regulation 60 Notice response as specific operating techniques required by the permit, through their inclusion in Table S1.2 of the Consolidated Variation Notice.

Annex 2: Improvement Conditions

Based in the information in the Operators Regulation 60 Notice response and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the BAT Conclusions are achieved by the installation. These additional improvement conditions are set out below - justifications for them are provided at the relevant section of the decision document (Annex 1).

Reference	Requirement	Date
IC1	The Operator shall submit a report for approval demonstrating how the current measures achieve BAT Conclusion 52 and meet the equivalent of the BAT AEL of 10mg/m ³ of dust. The report shall use at least two years of onsite ambient air quality monitoring data to show the impacts of fugitive dust emissions are no greater than if an extraction system was in place that meets the BAT AEL.	30 months from date of permit variation issue

Annex 3: Review and assessment of changes that are not part of the BAT Conclusions derived permit review.

This document should be read in conjunction with the application, supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
Receipt of submission		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the variation application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	The web publicising and consultation responses (Annex 5) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
The facility		
The regulated facility	A new listed activity has been added to Table S1.1 namely: Section 5.4 A(1) b) (iii) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment of slags and ashes.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	This is a multi operator installation and the plan includes the location of the other operators. A revised plan has been included which shows the location of the main operator of the Integrated Iron and Steel Works along with other operators.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Site condition report	The operator has provided a description of the condition of the site. The operator has previously provided a description of the condition of the site.	✓
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>As a result of the implementation of IED and its associated ELVs there will be a reduction of emissions Therefore this would have a positive impact on the identified sites.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	✓
Environmental Risk Assessment and operating techniques		
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the BATc set out through IED. Our decision can be viewed through this decision document.</p> <p>In respect of the new listed activity the treatment of slags and ashes. The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN “How to Comply with your Environmental Permit and the principles of S5.06 for hazardous and non hazardous waste operations and we consider them to represent appropriate techniques for the facility.</p>	✓
The permit conditions		
Updating permit conditions during consolidation.	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit.</p> <p>The operator has agreed that the new conditions are acceptable.</p>	✓
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility in Tables S2.2 of the permit. They are associated with the new listed activity of processing slag wastes.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table S1.2 in the permit.</p>	✓
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>These are in line with the relevant BATc AEL and associated IED requirements.</p>	✓
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. These are in line with the relevant BATc AEL and associated IED requirements.</p>	✓
Reporting	<p>We have specified reporting in the permit. We made these decisions in accordance with BATc.</p>	✓
Operator Competence		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>	✓
Technical competence	<p>Technical competency is required for activities permitted. The operator is a member of an agreed scheme.</p>	✓