

Industrial Emissions Directive: Questionnaire for Newly Prescribed Waste Activities

Background

The Environmental Permitting Regulations 2010 (EPR) control the way various industrial processes and waste management facilities are regulated to ensure the environment is protected. Regulation is delivered by a permitting system that has different types or levels of permits for these facilities, dependant on the risks those facilities create.

When EPR were amended¹ to implement the Industrial Emissions Directive (IED) the scope of the most protective type or level of permit, what we will refer to here as 'installation activities', was widened to include the recovery of non-hazardous wastes and some hazardous waste treatment and storage activities. Those activities now become installations when their throughput quantities or capacities are above certain thresholds.

These activities new to permitting as installations are referred to in this document as 'newly prescribed' waste activities - they are nearly all currently permitted as waste operations, a different or lower level of permitting. IED requires those newly prescribed waste activities to be permitted as installations by 7th July 2015.

The purpose of this questionnaire

This questionnaire supports the process of identifying sites where 'newly prescribed' waste activities are taking place. It is for operators to use to help establish whether their activities will be affected by these changes, whether they will need to make an application so their activity can be permitted as an installation, and will help us ascertain how you will be regulated in the future and how we can best advise you.

This questionnaire is supported by two information sheets. The first is entitled 'Information sheet #1: Identifying sites for permitting as installations'. This outlines the criteria for being a 'newly prescribed' waste activity and describes the process operators should follow if their activities have a capacity or throughput above one of the new thresholds. Information sheet #2 provides examples of facilities by reference to the activities taking place and works through how capacity issues are calculated.

This questionnaire is divided into different sections. The first gathers general information about:

- any current permit and its reference numbers;
- who the holder of the permit is and, if different, who the operator of the activity is; and
- whether there are any other permits associated with this facility.

The following sections in the questionnaire then seek information about different activities at the facility. There are separate sections for different sectors of the waste industry, namely biowaste treatment, other non-hazardous waste treatment, metals recycling ELV & WEEE activities and hazardous waste treatment and storage. Each of these sections gathers information about:

- the type of waste treatment or storage activity carried out;
- whether waste is recovered or disposed of;
- the quantity of waste the facility can process, known as the capacity or throughput; and
- whether a 'newly prescribed' waste activity is carried out.

¹ IED was implemented into the Environmental Permitting Regulations 2010 by The Environmental Permitting (England and Wales) (Amendment) Regulations 2013 SI 2013 No. 390

The final section concludes the likely outcome of the assessment in terms of:

- whether the activity should now be considered an installation, (in which case an application for an installation permit must be made);
- the type of application to be made; and
- whether that application will involve combining other permits into one permit (a consolidation)

The section references below are hyperlinks so that, if the operator only carries out, for example, a hazardous waste activity, the link gives quick & direct access to that section of the questionnaire. **Operators only need complete Section A, the sections relevant to their facility and Section F Summary & Outcome to confirm the conclusion of the assessment:**

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What should operators do?

To determine whether your facility is undertaking a ‘newly prescribed’ activity you must first identify any disposal operations set out in Annex I of the Waste Framework Directive and any recovery operations set out in Annex II of the Waste Framework Directive. Our advice is to prepare a schematic of the activities at your site, especially for more complex facilities. This advice and details of the Annex descriptions from the Waste Framework Directive are set out in Information Sheet #2.

A separate questionnaire should be completed for each existing permit where ‘newly prescribed’ activities may be taking place. This may be for a facility whose permits solely cover waste activities. It may be a facility whose permits cover both installation and waste activities. Where a facility has more than one permit covering their activities (perhaps a waste activity permit and an installation permit or several waste activity permits), then a questionnaire should be completed for each permit, especially if the outcome will be the consolidation of those permits into a single permit (see Information Sheet #1 for comment on consolidation). In these cases an application will be needed for each permit.

Where Operators are uncertain of the issues raised and the effect those issues may have on their facility we recommend they seek advice on this complex matter from their Area Compliance Officer or professional independent consultants.

Having completed the relevant sections and signed the questionnaires, it should be returned to your Area Compliance Officer by **dd/mm/yyyy** at the following address:

**<<INSERT
AREA
ADDRESS
>>**

Key Information

It is important that you read the two Information Sheets before completing the questionnaire. They will help you answer the questionnaire.

One of the changes the implementation of IED brought was a change to the way the capacity of a facility is assessed, particularly how the capacity of various processes are added together or aggregated, for comparison to the thresholds above which activities need to be permitted as installations.

Previously, when defining an installation, the consideration of the capacity of a facility included the amount of waste each specific activity was able to process. For example, when confirming the extent of an activity to treat non-hazardous waste for the purpose of disposal, the consideration of the 50 tonne per day threshold would have looked at the actual capacity of physical – chemical treatment processes or biological processes separately (i.e. what was 5.3 A(1) c) (i) and 5.3 A(1) c) (ii) activities were considered separately). Thus, if a particular facility had both physical – chemical and biological treatment processes each below the 50 tonne threshold then neither was permitted as installations.

The revised definitions of installation activities now place this capacity consideration at a higher level by taking the following approach within the activity definitions:

*Section 5.4 A(1) a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day ...
involving one or more of the following activities:*

- (i) biological treatment;*
- (ii) physico-chemical treatment;*

Thus, that same facility with the same throughputs, when now assessed against the post IED description for their activities would now be considered an installation as the 50 tonne per day threshold is breached when both activities are aggregated together. The same aggregation approach has implications for all the hazardous wastes treatment activities under section 5.3 A(1) a) and all the non-hazardous waste recovery activities under 5.4 A(1) b).

Section A Information about your permit and the operator

Complete as much of the information in this section as you can before moving on to the sector based sections of the questionnaire.

Please complete a separate form for each existing waste activity permit or each new facility if the activity is not already permitted.

Permit No.	EAWML/	Site Name	
Permit Holder		Site Address	
Other permit references	e.g. EPR reference / original WML reference		

Question A1 Is the permit holder also the operator? <i>If No please give the operator details below.</i>	Yes	
	No	
Question A2 Is there more than one operator on the site? <i>For example this could be those running the energy production unit separately to those running the waste processing. If Yes please give details of each operator below.</i>	Yes	
	No	
Question A3 Are there other permits for this site with the same operator? <i>If Yes please give the permit references below.</i>	Yes	
	No	
Question A4 Is this permit & the activities it regulates currently a standard rules permit? <i>If Yes please confirm the SRP below.</i>	Yes	
	No	
Question A5 When was the last time the existing permit was substantially updated? <i>This will help us determine how up to date the standards are within the permit. It may be the year the permit was issued, the year a new activity was included in the permit or the year the permit was last reviewed when it may have been upgraded to modern permit conditions</i>	Year	
Question A6 Does the site have a direct discharge to controlled waters e.g. stream & brook?	Yes	
	No	
Question A7 Does the facility have a trade effluent consent for discharge to sewer?	Yes	
	No	

Hyperlinks to the relevant sections:

<u>Section</u>	<u>Page</u>
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Section B Treatment of biowaste

The amendments to the EPR mean that certain waste activities like open windrow composting (OWC), in vessel composting (IVC) or anaerobic digestion (AD) that have been regulated under an EPR waste operation permit may now become an installation, if the activity has a capacity exceeding certain thresholds. You must have the right permit otherwise you will be operating illegally.

Identify relevant activities

Any activity that treats more than 75 tonnes per day of non-hazardous waste for the purpose of recovery using biological treatment techniques will be within the definition of a scheduled activity under section 5.4 A(1) b) (i). Activities treating more than 50 tonnes per day for the purpose of disposal will be within the definition of a scheduled activity under section 5.4 A(1) a) (i) but should already be permitted as installations. However, if those activities were below threshold and remain below threshold, the change to the approach to [aggregating](#) or adding together the capacity of various activities may now mean that those facilities are now considered an installation. See 'Aggregation across sector based activities' within Section F

First identify whether waste activities you carrying out are in Table 1, ignoring the thresholds for now: (Tick all that apply)

Table 1 Newly prescribed activities

Recovery Operations	
<i>Physico-chemical treatment of non-hazardous waste for recovery is not a part A(1) activity</i>	
5.4 A(1) b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving treatment of non-hazardous waste by biological treatment (excluding activities covered by Council Directive 91/271/EEC) – R3 or R5 activities	
Disposal Operations	
<i>Waste disposal operations above a threshold of 50 tonnes per day should already be regulated as installation activities. It is possible that, with the change in aggregation rules, some disposal activities which were previously regulated as waste activities because they were individually below the historic 50 tonne per day threshold, will now be aggregated together and be above the threshold. Identify whether there are now any disposal activities that may now be caught to be installations because of the changed approach to aggregation</i>	
5.4 A(1) a) (i) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving treatment of non-hazardous waste by biological treatment – all D8 activities	
5.4 A(1) a) (ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving treatment of non-hazardous waste by physico-chemical treatment – all D9 activities	
Treatment of wastewater	
<i>A new activity introduced by IED. Note the wastewater needs to be discharged by an installation carrying out any other Part A(1) or A(2) activity. The operator of the wastewater treatment process also needs to be different to the operator of the A(1) or A(2) activity. The biological or physico-chemical treatment activities under 5.4 remain the most apt description for those treatment activities above the relevant threshold. This activity will therefore only be relevant where the capacity is below those treatment process thresholds and is operated by a different operator to the A(1) process.</i>	
5.7 A(1)(a) Independently operated treatment of waste water not covered by the urban waste water treatment Directive and discharged by an installation carrying out any other Part A(1) or A(2) activity – R3 / D8 or D9 activities	

If your activities are not included in any of the ones listed in the Table 1 then it is likely that you are not affected by these changes. If you are any doubt then please contact your Area Compliance Officer to

confirm. If you are not affected then please consider the other sections in this questionnaire before signing and dating the questionnaire and sending it back to the address below.

Waste treatment activities

Table 2 List the different types of biowaste treatment activities you carry out as listed in Table 1

Activity	R or D codes	Chapter 5 reference number	Maximum daily treatment tonnage capacity at the site.	Max Annual Waste Quantity into the site(this relates to charging and standard rules)	
Example Open Windrow Composting	R3	5.4 A1 b) (i)	Pad area can treat 7000 tonnes in an 8 week cycle.	75000T per year	
Question B1 Aggregated tonnage for R codes					
Question B2 Aggregated tonnage for D codes					
Question B3 Does the facility have the capacity to carry out biological waste treatment activities for the purpose of recovery or a mix of recovery & disposal exceeding 75 tonnes per day? (or >100 tonnes per day if the only waste treatment activity is anaerobic digestion) (i.e. is this an installation activity)				Yes	
				No	
Question B4 Does the facility have the capacity to carry out biological waste treatment activities for the purpose of disposal exceeding 50 tonnes per day? (or >100 tonnes per day if the only waste treatment activity is anaerobic digestion) (i.e. is this an installation activity)				Yes	
				No	
Question B5 Does the facility have a wastewater treatment process where the capacity is below the 50 / 75 tonne per day thresholds and is operated by a different operator to the A(1) process.				Yes	
				No	

Table 3 List other activities on the site not mentioned in Table 2.

Activity description	Is this linked to an activity listed in Table 1 ?	How is it linked ?
e.g. Wood chipping	No wood shred for an incinerator	
e.g. Soil Blending	For land remediation	Blend with compost
e.g. Wood fed into compost	Yes	To provide bulk for air movement in composting process

If the Treatment of biowaste is your only activity, now go to Section F Summary & Outcome to conclude the questionnaire

EAWML Reference No.

Section C Non-hazardous waste treatment

PRE-TREATING WASTE FOR INCINERATION

The amendments to the EPR mean that activities like the shredding of waste to produce a product for combustion, one that may achieve a specification or a quality standard, may now define the site at which the activities are carried out as an installation, if capacity thresholds are exceeded. You must have the right permit otherwise you will be operating illegally.

Identify relevant activities

Activities that actively prepare waste for incineration or co-incineration above the threshold limits will be within the definition of a scheduled activity (5.4 A(1) a) (iii) for disposal with a 50 tonne per day threshold & 5.4 A(1) b) (ii) for recovery with a 75 tonne per day threshold). These activities may include drying, shredding, granulisation, pelletising etc, perhaps to meet a specification.

First identify whether the waste activities you are carrying out are included in Table 4 ignoring the thresholds for now. Pre-treatment for the purpose of *recovery* is relevant if the combustion facility receiving the treated waste is a recovery facility i.e. it demonstrates it meets the R1 Energy Recovery formula. Pre-treatment for the purpose of *disposal* should be applied to any other type of combustion facility

Table 4 Newly prescribed activities

Disposal Operations		Recovery Operations	
5.4 A(1) a) (iii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving pre-treatment of non-hazardous waste for incineration and co-incineration - D9 activities		5.4 A(1) b) (ii) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of non-hazardous waste for incineration and co-incineration – R3 activities	

If your activities are not included in any of the ones listed in Table 4 then it is likely that you are not affected by these particular changes. If you are any doubt then please contact your Area Compliance Officer to confirm. If you are not affected then please consider the other sections in this questionnaire before signing and dating the questionnaire and sending it back to the address below.

Waste treatment activities

Table 5 List the different types of waste activities you carry out as listed in Table 4

Activity	R or D codes	Chapter 5 reference number	Maximum daily treatment tonnage capacity at the site.	Max Annual Waste Quantity into the site(this relates to charging and standard rules)
Example Shredding non-recyclables	R3	5.4A1(b)(ii)	Design capacity for shredder is 10 tonnes per hour. Planning restricts operations to 12 hours per day	75000T per year
Wood shredding to supply biomass power stations	R3	5.4A1(b)(ii)	Design capacity for shredder is 10 tonnes per hour. Planning restricts operations to 12 hours per day	75000T per year

Question C1	Aggregated tonnage for R codes		
Question C2	Aggregated tonnage for D codes		
Question C3	For pre-treatment activities does the facility have the capacity to carry out recovery or a mix of disposal & recovery activities exceeding 75 tonnes per day? (i.e. is this an installation activity)	Yes	
		No	
Question C4	For the pre-treatment activities does the facility have the capacity to carry out a disposal activities exceeding 50 tonnes per day? (i.e. is this an installation activity)	Yes	
		No	

Table 6 List other activities on the site not mentioned in Table 5.

Activity description	Is this linked to an activity listed in Table 4 ?	How is it linked ?
MRF	Yes	Non-reyclables fed directly from MRF. No interim storage – this will be a DAA to the shredding activity

TREATING SLAGS & ASHES

The amendments to the EPR mean that the treatment of slags and ashes may now become a waste installation, if capacity thresholds are exceeded. You must have the right permit otherwise you will be operating illegally.

Identify relevant activities

The principal aim in the treatment of slags and ashes is usually to improve the quality of the product to generate a material that has the potential for recovery (e.g. for use as a secondary aggregate material in road construction) and mechanically separate and collect the ferrous and non-ferrous metal fractions for further recycling. Activities above the threshold limits will be within the definition of a scheduled activity namely 5.4 A(1) b) (iii) for recovery with a 75 tonne per day threshold.

First identify whether the waste activities you are carrying out are included in Table 7 ignoring the threshold for now. The treatment of slags and ashes to produce a substitute aggregate / construction material is likely to be classified as a R5 waste recovery operation thus 5.4 A(1) b) (iii) is likely to be the most apt activity reference

Table 7 Newly prescribed activities

Recovery Operations	
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 – R5 activities	

If your activities are not included in any of the ones listed in the Table 7 then it is likely that you are not affected by these particular changes. If you are any doubt then please contact your Area Compliance Officer to confirm. If you are not affected then please consider the other sections in this questionnaire before signing and dating the questionnaire and sending it back to the address below.

Waste treatment activities

Table 8 List the different types of waste activities you carry out as listed in Table 7

Activity	R or D codes	Chapter 5 reference number	Maximum daily treatment tonnage capacity at the site.	Max Annual Waste Quantity into the site(this relates to charging and standard rules)	
Example IBA Recovery	R5	5.4A1(b)(iii)	Design capacity for the crusher is 20 tonnes per hour. Planning restricts operations to 12 hours per day	75000T per year	
Question C5 Aggregated tonnage for R codes					
Question C6 For ash & slag treatment, does the facility have the capacity to carry out recovery or a mix of disposal & recovery activities exceeding 75 tonnes per day? (i.e. is this an installation activity)				Yes	
				No	

Table 9 List other activities on the site not mentioned in Table 8.

Activity description	Is this linked to an activity listed in Table 7?	How is it linked ?
None		

If Non-hazardous waste treatment is your only activity, now go to Section F Summary & Outcome to conclude the questionnaire

Section D Metals recycling, ELV and WEEE activities

The amendments to the EPR mean that the treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components may now become a waste installation if the capacity exceeds activity description thresholds. The temporary storage of more than 50 tonnes of hazardous waste such as batteries or oils may also become a waste installation. You must have the right permit otherwise you will be operating illegally.

Identify relevant activities

Apart from the specific reference to metals, ELVs and WEEE under section 5.4, activities involving hazardous waste such as certain WEEE and wastes from ELVs may fall under sections 5.3 and / or 5.6.

Section 5.3 includes the disposal or recovery of hazardous waste by physico-chemical treatment. Physico-chemical includes mechanical treatment but does not include the manual dismantling and depollution of ELVs and other types of equipment. So, for example, the hand dismantling or refurbishment of hazardous WEEE is not a listed activity but the mechanical shredding or similar size reduction of hazardous WEEE in plant with a capacity greater than 10 tonnes a day will fall under section 5.3 as a hazardous waste treatment activity

First identify whether the waste activities you are carrying out are included in Table 10 ignoring the threshold for now.

Table 10 Newly prescribed activities

Treating hazardous wastes	
5.3 A(1) a) (ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment - R3, R4 and R5 activities	
Treating non-hazardous waste	
5.4 A(1) b) (iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components – R4 activities	
Storage Operations	
<i>IED introduced a new activity specifically for the storage of hazardous waste. Note the requirement for it to be storage pending other activities in Chapter 5. Hence, if your ELV's are being stored pending their manual dismantling and depollution, then, as that is not a scheduled activity, the quantity of ELV's stored for that particular activity does not need to be considered here.</i>	
5.6 A(1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph 5.6 A(1) (b), except— (i) temporary storage, pending collection, on the site where the waste is generated, or (ii) activities falling within Section 5.2	

If your activities are not included in any of the ones listed in Table 10 then it is likely that you are not affected by these particular changes. If you are any doubt then please contact your Area Compliance Officer to confirm. If you are not affected then please consider the other sections in this questionnaire before signing and dating the questionnaire and sending it back to the address below.

Waste treatment activities

Do not include the depollution and dismantling of ELVs and WEEE using hand held equipment nor the refurbishment or hand sorting / dismantling of WEEE

Table 11 List the different types of waste treatment activities you carry out as listed in Table 10

Activity	R or D codes	Currently in an installation permit	Daily processing capacity in tonnes
Treating hazardous waste			
Mechanical treatment of ships, aircraft and other vehicle types that still contain hazardous materials or components			
Crushing and separation into fractions of lamps that are hazardous waste			
Crushing and separation into fractions of CRTs and CRT containing equipment			
Crushing and separation into fractions of flat screen devices			
Stage 1 (degassing) treatment of refrigeration and air conditioning equipment			
Stage 2 (shredding or similar mechanical treatment) of refrigeration cabinets			
Baling or shredding fridge/freezer cabinets			
Separation of refrigerant from compressor oil			
Mechanical treatment and separation of small mixed WEEE containing hazardous components			
Treatment of batteries that are hazardous waste			
Treatment of any other hazardous WEEE– please specify below			
Question D1 Aggregated tonnage of hazardous waste for R codes (t/d)			
Question D2 Aggregated tonnage of hazardous waste for D codes (t/d)			
Question D3 Does the facility have the capacity to carry out activities for the disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico chemical treatment? (i.e. is this an installation activity)			Yes
			No
Treating non hazardous waste			
Shredding of metal wastes including ELV's, WEEE and their components			
Question D4 Aggregated tonnage of non hazardous waste for R codes			
Question D5 Does the facility have the capacity to carry out activities for the recovery or a mix of disposal & recovery of non-hazardous waste exceeding 75 tonnes per day involving the treatment in shredders of metal waste? (i.e. is this an installation activity)			Yes
			No

Waste storage activities

Turning now to waste storage activities, complete the following table but do not include the storage of ELVs pending manual depollution

Table 12 List the different types of waste storage activities you carry out as listed in Table 10

Activity	Specify R13 or D15	Currently in an installation permit	Storage capacity in tonnes
Storage Activities			
Storage of any ELV (including ships and aircraft) that will not be fully depolluted before mechanical treatment			
Storage of any hazardous WEEE (include whole WEEE and separated fractions such as hazardous batteries, refrigerants etc)			
Storage of oils, lead acid batteries and all other hazardous components resulting from the depollution of ELVs (including ships, aircraft etc)			
TOTAL	tonnes/day	A	
Storage of any hazardous waste included above that is stored solely for refurbishment or will have ALL hazardous components and materials removed manually before undergoing mechanical treatment		B	
Question D6 Aggregated hazardous waste storage capacity i.e. total less that stored for manual treatment only (A minus B)			
Question D7 Does the facility have the capacity for the temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending combustion, landfill, other storage or scheduled treatment activities? (i.e. is this an installation activity)		Yes	
		No	

If Metals recycling, ELV and WEEE activities are your only activity now go to Section F Summary & Outcome to conclude the questionnaire

Section E Hazardous waste treatment & storage

The amendments to the EPR mean the treatment or storage of hazardous waste previously regulated as a waste activity may now become a waste installation. You must have the right permit otherwise you will be operating illegally.

Identify relevant activities

Prior to the EPR amendments, treating more than 10 tonnes per day of hazardous wastes or waste oils for the purpose of *disposal* was defined as an installation activity. The newly prescribed activities for hazardous waste treatment now include treatment of the same material for the purpose of *recovery* (where that activity was not previously caught by the old 5.4 A(1) activities). Activities not previously regulated as installations but treating more than 10 tonnes per day of hazardous waste (including waste oils) will be within the new definitions for 5.3 A(1) a) (i) to (iv) activities

Newly prescribed activities also include a new activity specifically for the storage of hazardous waste. Activities not previously regulated as installations but storing above the 50 tonne storage threshold limits will be within the new definitions for 5.6 A(1) a).

First identify whether the waste activities you are carrying out are included in Table 13 ignoring the thresholds for now. Note, if you are undertaking hazardous WEEE, you may need to complete Section D Metals recycling, ELV and WEEE activities, please contact your Area Compliance Officer for further information.

Table 13 Newly Prescribed Activities

Hazardous Waste Treatment Operations	
5.3 A(1) a) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities— (i) biological treatment; (ii) physico-chemical treatment; (iii) blending or mixing prior to submission to any of the other activities listed in this Section or in Section 5.1; (iv) repackaging prior to submission to any of the other activities listed in this Section or in Section 5.1; (v) solvent reclamation or regeneration; (vi) recycling or reclamation of inorganic materials other than metals or metal compounds; (vii) regeneration of acids or bases; (viii) recovery of components used for pollution abatement; (ix) recovery of components from catalysts; (x) oil re-refining or other reuses of oil; (xi) surface impoundment.	
Hazardous Waste Storage Operations	
<i>IED introduced a new activity specifically for the storage of hazardous waste. Note the requirement for it to be storage pending other activities in Chapter 5.</i>	
5.6 A(1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph 5.6 A(1) (b), except— (i) temporary storage, pending collection, on the site where the waste is generated, or (ii) activities falling within Section 5.2	
Non hazardous waste treatment & storage activities	
<i>The biological treatment of non-hazardous waste will be a newly prescribed activity when capacity exceeds 75 tonnes per day. If more than 75 tonnes of non-hazardous waste are shredded for the purpose of incineration that will become a newly prescribed activity. Operators of those activities should complete Section B and / or Section C .</i>	

If your activities are not included in any of the ones listed in Table 13 then it is likely that you are not affected by these particular changes. If you are in any doubt then please contact your Area Compliance Officer to confirm. If you are not affected then please consider the other sections in this questionnaire before signing and dating the questionnaire and sending it back to the address below.

Identify disposal and recovery hazardous waste treatment activities

Consider all the hazardous waste activities on your site. You should complete the table with the maximum daily tonnages for each disposal and recovery operation undertaken.

Table 14 List the different types of waste treatment activities you carry out as listed in Table 13

Disposal Operation	Max Daily Tonnage	Recovery Operation	Max Daily Tonnage	Recovery Operation	Max daily Tonnage	
<i>Complete the table with the maximum daily tonnages for each disposal and recovery operation undertaken. Please asterisk * each operation currently within an installation permit</i>						
D8		R2		R7		
D9		R3		R8		
D13		R4		R9		
D14		R5		R11		
		R6		R12		
Question E1 Aggregated tonnage for the treatment of hazardous waste for the purpose of recovery						
Question E2 Aggregated tonnage for the treatment of hazardous waste for the purpose of disposal						
Question E3 Total aggregated tonnage of hazardous waste						
Question E4 Does the facility have the capacity to treat, repackage or blend > 10 tonnes of hazardous waste per day for disposal or recovery? (i.e. is this an installation activity)					Yes	
					No	

Identify disposal and recovery hazardous waste storage activities

Turning now to waste storage activities, complete the following table for any storage facilities for hazardous waste

Table 15 List the different types of hazardous waste storage activities listed in Table 13

Temporary Storage Operation	Total Capacity in Tonnes	Throughput Capacity in Tonnes	Destination of stored wastes	
D15				
R13				
<i>Please indicate destination as: Incineration and co-incineration of waste (R1), disposal of waste by landfill (D1, D4, D5) disposal or recovery of hazardous waste or please state if other. Please asterisk * each operation currently within an installation permit.</i>				
Question E5 Does the whole facility have the capacity to store > 50 tonnes of hazardous waste? (i.e. is this an installation activity)			Yes	
			No	

Identify disposal and recovery non- hazardous waste treatment activities

Finally for this sector, we recognise that in the hazardous waste treatment sector, non-hazardous wastes are sometimes also treated alongside the hazardous wastes. Table 16 is gathering information on the extent of these activities and asking the operator to declare in their returns where they do undertake non-hazardous treatment activities alongside their hazardous treatment activities.

Table 16 List different types of non-hazardous waste storage and treatment activities

Disposal Operation	Max Daily Tonnage	Recovery Operation	Max Daily Tonnage	Recovery Operation	Max daily Tonnage				
D8		R2		R8					
D9		R3		R9					
D13		R4		R11					
D14		R5		R12					
D15		R6		R13					
		R7							
Question E6 Does the facility treat or transfer non-hazardous waste? <i>Please asterisk * each operation currently within an installation permit.</i>					<table border="1"> <tr> <td>Yes</td> <td></td> </tr> <tr> <td>No</td> <td></td> </tr> </table>	Yes		No	
Yes									
No									

If Hazardous waste treatment & storage is your only activity, now go to [Section F Summary & Outcome](#) to conclude the questionnaire

Section F Summary & Outcome

This section draws together the answers from the sector based sections of this questionnaire to consider whether aggregation rules apply across sectors. Key questions are then asked based on the conclusions drawn from these sections.

Aggregation across sector based activities

Where individual sector based activities have not been identified as being above installation threshold in their own right, we need to establish whether the aggregated capacities of all the activities falling within the same activity description at a facility will exceed the activity thresholds. If they do, those combined activities constitute an installation, without any of the individual processes being above the threshold in their own right.

If you have a facility with more than one permit you may need to seek support from your local EA Officer with this aggregation, particularly if you would like these permits consolidating into a single EPR permit.

Table 17 For the recovery of non-hazardous waste (i.e. 5.4 A(1) b) (i) to (iv) activities):

From Question B1 in Table 2, Section B Treatment of biowaste, the aggregated tonnage for R codes	
From Question C1 in Table 5, Section C Non-hazardous waste treatment - Pre-treating waste for incineration, the aggregated tonnage for R codes	
From Question C5 in Table 8, Section C Non-hazardous waste treatment - Treating slags & ashes, the aggregated tonnage for R codes	
From Question D4 in Table 11, Section D Metals recycling, ELV and WEEE activities, the aggregated tonnage of non hazardous waste for R codes	
Question F1 Aggregated capacity for the recovery of non-hazardous waste	
Question F2 If the answers to Question B3, Question C3, Question C6 or Question D5 have not already identified this facility as including an installation activity is this aggregated capacity > 75 tonnes per day (i.e. is this an installation activity).	Yes
	No

Table 18 For the disposal of non-hazardous waste (i.e. 5.4 A(1) a) (i) to (v) activities):

From Question B2 in Table 2, Section B Treatment of biowaste, the aggregated tonnage for D codes	
If there any other physico-chemical treatment activities at this facility for the purpose of disposal that are below the 50 tonnes per day threshold in their own right please confirm the daily tonnage capacity for these activities? <i>If there were activities above the 50 tonne per day threshold, they should already be permitted as installations.</i>	
From Question C2 in Table 5, Section C Non-hazardous waste treatment - Pre-treating waste for incineration, the aggregated tonnage for D codes	
Question F3 Aggregated capacity for the disposal of non-hazardous waste	
Question F4 If the answers to Question B4 or Question C4, have not already identified this facility as including an installation activity is this aggregated capacities > 50 tonnes per day (i.e. is this an installation activity).	Yes
	No

Table 19 For the recovery or disposal of hazardous waste (i.e. 5.3 A(1) a) (i) to (xi) activities)

From Question D1 in Table 11, Section D Metals recycling, ELV and WEEE activities for the aggregated tonnage of hazardous waste for R codes	
From Question D2 in Table 11, Section D Metals recycling, ELV and WEEE activities for the aggregated tonnage of hazardous waste for D codes	
From Question E1 in Table 14, Section E Hazardous waste treatment & storage the aggregated tonnage for the treatment of hazardous waste for the purpose of recovery	
From Question E2 in Table 14, Section E Hazardous waste treatment & storage the aggregated tonnage for the treatment of hazardous waste for the purpose of disposal	
Question F5 Aggregated capacity for the recovery or disposal of hazardous waste	
Question F6 If the answers to Question D3 or Question E4 have not already identified this facility as including an installation activity, does the facility have the aggregated capacity to treat, repackage or blend > 10 tonnes of hazardous waste per day for disposal or recovery (i.e. is this an installation activity).	Yes
	No

What does the outcome of this questionnaire mean to the Operator

This questionnaire, supported by the information sheets, has sought to identify activities that may be defined as ‘newly prescribed activities’. This last section of the questionnaire seeks confirmation of the next step the Operator may wish to take if they intend to comply with the IED and, where their activities have the capacity to be operated above the new thresholds, be permitted as installations by 7th July 2015.

Table 20 What outcome does the questionnaire lead to?

Question F7 Are there any newly prescribed activities on the site? <i>If the answer is 'No' there should be no need to answer the remaining questions. The Operator should move to the end of the questionnaire where you are asked to confirm your name and position as a record of the activities at your facility</i>	Yes
	No
Question F8 Is the Operator going to apply to have that newly prescribed activity permitted as a new installation activity or restrict their activity, reducing capacity below the thresholds? <i>If the answer is apply, continue on to Question F9. If activities are to be restricted below the capacity thresholds for installation activities please give details below of how this will be achieved .</i>	Apply
	Restrict
Question F9 Is there currently an installation based standard rules permit that you activities are eligible for, fitting your activity, that you could apply for? <i>If Yes please confirm which SRP below.</i>	Yes
	No
Question F10 If we created a new installation standard rules set with similar criteria to current waste activity standard rules set but covering an installation activity would your operation fit within those criteria & would you apply for that standard rules set?	Yes
	No

Question F11 Will the new installation include all of the waste operations carried out at the site? <i>If No, please describe below the activities that will remain under the waste operation permit, and whether that will need to be varied to take account of the changes.</i>	Yes	
	No	
Question F12 Are you going to apply to have the permits identified in Question A3 consolidated into one permit? <i>All activities from installation permit(s) and waste operation permit(s) for the one facility or site will be combined into a single permit. We will need an application for all the permits involved. Please refer to Information sheet #1 where the reasoning for this question is provided. If No, please explain why not.</i>	Yes	
	No	
	N/A	
Question F13 If you intend to make an application, what form will the application take? <i>Please refer to Information Sheet #1 that explains the different forms an application could take. If unsure, please explain why. If 'New' please briefly justify why it can't be included in an existing permit</i>	SRP	
	Admin	
	MTV	
	Normal	
	Substantial	
	New	
Please give any other details or comments below you may feel relevant to the permitting of newly prescribed activities:		

Making the application

Information Sheet #1 provides information on the type and extent of the information that applications will need to provide. The Regulations define the date by which duly made applications for each of the newly prescribed activities need to be submitted. We will help define what a duly made application will look like. Clearly, if you have a facility with more than one newly prescribed activity, the application for all the activities at that facility will have to be submitted at the earliest date for those activities so the proposals for and potential impact of the facility as a whole can be assessed.

If you would like to have a pre-application meeting with the EA please contact your Area Compliance Officer.

The dates for submission are as follow:

Existing waste facilities as newly prescribed activities	
<p>Section 5.3 A(1) a) - Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving one or more of the following activities—</p> <ul style="list-style-type: none"> (i) biological treatment; (ii) physico-chemical treatment; (iii) blending or mixing prior to submission to any of the other activities listed in this Section or in Section 5.1; (iv) repackaging prior to submission to any of the other activities listed in this Section or in Section 5.1; (v) solvent reclamation or regeneration; (vi) recycling or reclamation of inorganic materials other than metals or metal compounds; (vii) regeneration of acids or bases; (viii) recovery of components used for pollution abatement; (ix) recovery of components from catalysts; (x) oil re-refining or other reuses of oil; (xi) surface impoundment. 	31 st December 2014
<p>Section 5.4 A(1) a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment—</p> <ul style="list-style-type: none"> (i) biological treatment; (ii) physico-chemical treatment; (iii) pre-treatment waste for incineration or co-incineration; (iv) treatment of slags and ashes; (v) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components. 	31 st December 2014
<p>Section 5.4 A(1) b) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—</p> <ul style="list-style-type: none"> (i) biological treatment; (ii) pre-treatment of waste for incineration or co-incineration; (iii) treatment of slags and ashes; (iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components 	30th September 2014
<p>Section 5.6 A(1) a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 and paragraph (b) of this Section, except—</p> <ul style="list-style-type: none"> (i) temporary storage, pending collection, on the site where the waste is generated, or (ii) activities falling within Section 5.2. 	31 st March 2015

Having completed the questionnaire, now please confirm your name and position as a record of the activities at your facility.

Signed:

Company Position:

Date:

PLEASE RETURN THIS QUESTIONNAIRE TO:

<<INSERT AREA ADDRESS>>

Please return this questionnaire to the address at the bottom of the last page by **xxxxx**

All references to Agency guidance can be found on our web-site at www.environment-agency.gov.uk or from you local Agency Office or NCCC Telephone 08708 506506.

EAWML Reference No.