

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

DTS Trading Limited
DTS Trading Limited
Unit 20
The Furlong
Berry Hill Industrial Estate
Droitwich
Worcestershire
WR9 9AH

Variation application number

EPR/HB3600HL/V003

Permit number

EPR/HB3600HL

DTS Trading Limited

Permit number EPR/HB3600HL

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

This variation and consolidation make the following changes to the permit:

- Allowing all waste plastic to be pelletised. The use of the Erema equipment to pelletise waste was previously restricted to waste code 15 01 02 plastic packaging only.
- Adding treatment of plastics by washing to remove contamination. This includes installing a wash plant, associated drier and water treatment plant on site. This changes the permitted activity on site from physical treatment to a physical and chemical treatment.
- Adding waste codes 12 01 05 plastics shavings and turnings and 15 01 01 paper and cardboard packaging.

The schedules specify the changes made to the permit.

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

Status log of the permit		
Description	Date	Comments
Permit determined EPR/HB3600HL/A001	18/02/21	Permit for a physical treatment facility issued to DTS Trading Limited
Variation issued EPR/HB3600HL/V002	18/10/22	Varied permit issued to change the registered office address
Application received EPR/HB3600HL/V003	Duly made 04/12/23	Application to add washing treatment for plastic, extend pelletising treatment to all plastic waste, and add waste codes.
Response to Schedule 5 Notice dated 09/04/24	07/06/24	Revised Fire Prevention Plan Revised Environmental Risk Assessment Draft Wash Plant Management Plan Revised waste pre-acceptance, acceptance and non-conformance procedure Revised site layout and site drainage plan
Response to Schedule 5 Notice dated 09/04/24	03/07/24	Revised Environmental Risk Assessment
Additional information received	11/07/24	CIWM and WAMITAB qualification Continuing Competence certificate

Status log of the permit		
Description	Date	Comments
Variation determined and consolidation issued EPR/HB3600HL	14/08/24	Varied and consolidated permit issued

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/HB3600HL

Issued to

DTS Trading Limited (“the operator”)

whose registered office is

**20 The Furlong
Berry Hill Industrial Estate
Droitwich
Worcestershire
WR9 9AH**

company registration number 08065330

to operate a regulated facility at

**DTS Trading Limited
Unit 20
The Furlong
Berry Hill Industrial Estate
Droitwich
Worcestershire
WR9 9AH**

to the extent set out in the schedules.

The notice shall take effect from 14/08/2024

Name	Date
Alan Whitley	14/08/2024

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions were varied as a result of the application made by the operator:

Table S1.1 activities (as referenced in condition 2.1.1)

Table S1.2 Operating techniques (as referenced in condition 2.3.1 and 2.3.2)

Table S2.1 Permitted waste types and quantities (as referenced in condition 2.3.3)

Schedule 6 – Interpretation

The following conditions are added as a result of the application made by the operator:

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.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/HB3600HL

This is the consolidated permit referred to in the variation and consolidation notice for application
EPR/HB3600HL/V003 authorising,

DTS Trading Limited (“the operator”),

whose registered office is

**20 The Furlong
Berry Hill Industrial Estate
Droitwich
Worcestershire
WR9 9AH**

company registration number 08065330

to operate waste operations at

**DTS Trading Limited
Unit 20
The Furlong
Berry Hill Industrial Estate
Droitwich
Worcestershire
WR9 9AH**

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

Name	Date
Alan Whitley	14/08/2024

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.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Avoidance, recovery and disposal of wastes produced by the activities

- 1.2.1 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 disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.2.2 The operator shall 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.

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”).

2.2 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.

2.3 Operating techniques

- 2.3.1 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.

- 2.3.2 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 or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, 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.
- 2.3.3 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.

2.4 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.

3 Emissions and monitoring

3.1 Emissions of substances not controlled by emission limits

- 3.1.1 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.
- 3.1.2 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 which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.1.3 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.

3.2 Odour

- 3.2.1 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.
- 3.2.2 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 which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.3 Noise and vibration

- 3.3.1 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.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Pests

- 3.4.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution, hazard or annoyance from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Fire prevention

- 3.5.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

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 Within one 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 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 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.
- 4.3.5 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.

4.4 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

Table S1.1 activities	
Description of activities for waste operations	Limits of activities
AR1: Physical and Chemical Treatment of Waste R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes) R4: Recycling/reclamation of metals and metal compounds R5: Recycling/reclamation of other inorganic compounds R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)	Physical treatment including manual sorting, shredding, baling, granulating, washing, and pelletising of non-hazardous waste for recovery. Shredding, granulating, washing and pelletising treatment activities are for use on plastic waste only. Subject to any other requirements of this permit wastes shall be stored for no longer than 3 years prior to recovery. All wastes shall be stored and treated on an impermeable surface with sealed drainage system. Waste types as specified in Table S2.1

Table S1.2 Operating techniques		
Description	Parts	Date Received
Non-hazardous and inert waste: appropriate measures for permitted facilities Version published 12 July 2021 Updated: 1 August 2023	All parts of the appropriate measures guidance shall apply.	N/A
Response to Schedule 5 Notice dated 09/04/24	Approved Fire Prevention Plan Document Reference DTS02 FPP V.5 June 2024	07/06/24
Response to Schedule 5 Notice dated 09/04/24	Wash Plant Management Plan (Draft) June 2024	07/06/24

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	With regards to the wash waters in the washing plant on site, the operator shall: Throughout a 12-week period, undertake weekly quantitative monitoring of the wash waters in the washing plant. The wash waters should be sampled from various parts of the washing plant (including clean water tanks) and tested against a suite of determinants which must as a minimum include testing for: Arsenic, Boron, Cadmium, Chromium, Copper, Iron, Lead, Manganese, Mercury, Nickel, Selenium, Zinc, Chloride, Total Petroleum Hydrocarbons ("TPH"), Poly Aromatic Hydrocarbons ("PAH"), pH, Biochemical oxygen demand ("BOD"), Chemical Oxygen Demand ("COD"), Total Organic Carbon ("TOC"), BTEX (Benzene, Toluene, Ethyl-Benzene and Xylene), Perfluoroalkyl and polyfluoroalkyl substances ("PFAS") Polychlorinated biphenyls ("PCB") and Polyvinyl Chloride ("PVC") additives. Within 60 days of the final round of monitoring, provide a written report of the monitoring results to the Environment Agency for review. The report must also include details of the waste material inputs to the washing plant for each week of the 12-week monitoring period (including waste sources, codes and tonnages) plus identify any anomalous results, issues and problematic waste streams.	Within 6 months of the washing of non-hazardous wastes commencing
IC2	Using the monitoring results obtained in accordance with improvement condition IC1 above, the operator shall submit an updated written Wash Waters Management Plan for approval by the Environment Agency. The plan must: • Establish proposals for how the wash waters will continue to be managed. • Propose controls for waste acceptance for the purposes of minimising cross contamination of treated wastes/materials. • Propose a new wash water monitoring regime which must include: ○ The parameters/determinants to be monitored ○ The maximum acceptable levels for those parameters And, ○ The frequency of monitoring. • Establish procedures for the removal of the wash water from the washing plant and site in situations where any wash water parameter exceeds the maximum acceptable level.	Within 2 months following submission of written report of monitoring results for condition IC1 above.

Schedule 2 – Waste types

Table S2.1 Permitted waste types and quantities for Physical and Chemical Treatment of Waste facility	
Maximum quantity	The total quantity of waste accepted at the site for the above activity shall be less than 100,000 tonnes a year.
Waste code	Description
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 04	waste plastics (except packaging)
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard
03 03	wastes from pulp, paper and cardboard production and processing
03 03 08	wastes from sorting of paper and cardboard destined for recycling
07	Wastes from organic chemical processes
07 02	wastes from the MFSU of plastics, synthetic rubber and man-made fibres
07 02 13	waste plastic
12	Wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 05	plastics shavings and turnings
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 04	metallic packaging
15 01 06	mixed packaging
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 19	plastic
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 02	wood, glass and plastic
17 02 03	plastic
19	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
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 04	plastic only
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions

20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 39	plastics

Schedule 3 – Emissions and monitoring

There are no emission limits or associated monitoring requirements.

Schedule 4 – Reporting

There is no reporting under this schedule.

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	
Name of operator	
Location of Facility	
Time and date of the detection	

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

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
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.	

Name*	
Post	
Signature	
Date	

* 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 the Waste Framework Directive.

“Annex II” means Annex II to the Waste Framework Directive.

“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.

“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 or background concentration limit.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“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.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“pests” means birds, vermin and insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“R” means a recovery operation provided for in Annex II to the Waste Framework Directive.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

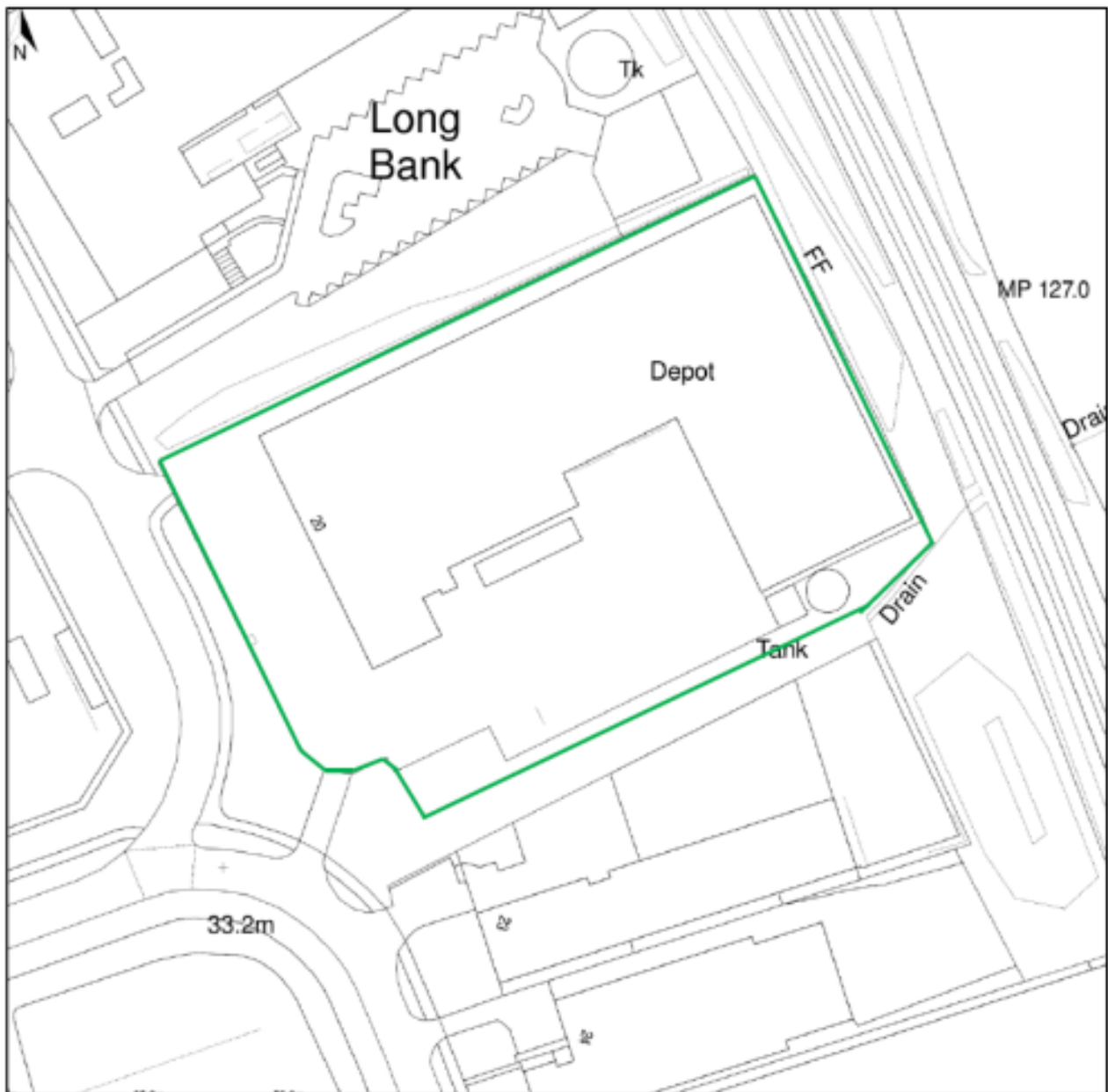
“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“year” means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, table S2.1, for that table they have the meaning given below:

“hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

Schedule 7 – Site plan



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END OF PERMIT