

*One point has been brought to my attention regarding the acceptance and treatment of halogenated wastes (as listed in Appendix 3 of the Main Document). The Waste Treatment BATCs suggests that "recirculation of process off-gases in a steam boiler may not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F." Please also provide additional detail on how you will address this requirement as well.*

The boiler system has not been designed with the intention of treating halogenated solvent wastes

We do not process and recover any halogenated fractions to a product.

Where we accept halogenated solvents, the halogenated part is either trace or a very minor fraction. We need to maintain the current list of acceptable wastes (EWC codes) to reflect this requirement.

Halogenated solvents will present as higher boiling point materials and these will remain in the distillation unit kettle as a process residue

The combination of abatement options which also includes condensation and scrubbing are appropriate for minimising the levels of these solvents.

The management of low levels of halogenated solvent on site can be through waste pre-acceptance and acceptance procedures or by maintaining an overall mass balance (or percentage) of halogenated solvent on site.

Any changes to inventory or processing conditions would need to be agreed with the EA to ensure arrangements are in place to prevent releases to thermal treatment on on-line steam boiler.