

**From:** [Naomi Daniel](#)  
**To:** [Billy Glasgow](#)  
**Cc:** [Lisa Jobling](#)  
**Subject:** RE: EPR/WE8923AB/V004 We Need More Information About Your Application CRM:0831084  
**Date:** 08 August 2025 12:54:00  
**Attachments:** [image001.jpg](#)

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Hi Billy,

Great thanks for this.

I understand payment will be made using ref PSCAPPWASTDUNT0251. Please could you confirm this and when the payment is made, I can then have it allocated to this application.

I cannot duly make this application until paid in full.

Also, I have confirmation TCM registered for HROC6 and HROC4a and section 8.2 of application states this should be completed 31/07/2025.

Please could you provide completion certificate and registration if this has been achieved?

Many thanks

Naomi

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**From:** Billy Glasgow <billy.glasgow@ramboll.com>  
**Sent:** 08 August 2025 09:12  
**To:** Naomi Daniel <naomi.daniel01@environment-agency.gov.uk>; SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>  
**Cc:** Lisa Jobling <lisa.jobling@ramboll.co.uk>; Richard Hadley <richard.hadley@environment-agency.gov.uk>  
**Subject:** RE: EPR/WE8923AB/V004 We Need More Information About Your Application CRM:0831084

Hi Naomi,

Thank you for providing the request for information (RFI) associated with the permit variation application for Dunton Technologies Limited (Dunton's) Bridge Street North Facility (EPR/WE8923AB/V004).

We have prepared responses, on behalf of Dunton, to provide/confirm the information requested in your RFI's of 1st August 2025 and 4th August 2025 regarding the permit variation application. In addition, we have followed up with the Applicant to arrange for the payment of the additional fee associated with the permit variation application.

To assist in the review of the additional information, the EA request and Ramboll's responses, is provided below. Where additional documentation is required or an update to existing documentation then this information has been attached.

Our Response to the EA's RFI's of 1st August 2025 and 4th August 2025 is set out below:

Request for Information	Response
<b>Form C3</b> 1. You have listed EWC codes for wastes to be accepted under the waste operation for treatment of non-hazardous wastes.	In view of the code no longer being listed on the standard rules permit SR2022 12, please remove EWC code 19 08 99 "wastes not otherwise specified" from the application.

<p>19 08 99 "wastes not otherwise specified" is listed. Provide justification for requesting this code. What wastes do you expect under this code, are you able to narrow this to specify the actual waste type to include with this code?</p>	<p>Wastes listed under this code will not be accepted at the facility for treatment</p>
<p><b>Form C3</b></p> <p>2. Figure 9.1 Site plan does not provide labels for hazardous waste storage area, does not indicate drainage, impermeable areas or infrastructure of bays. Provide this information within one plan.</p>	<p>There is no change to the site plan, drainage diagram, infrastructure of bays or impermeable areas of the site as a consequence of this permit variation. This information was provided as part of the Substantial Variation Application submitted to the EA on 28 July 2023 to undertake hazardous waste operations at the site.</p> <p>The permit variation application was determined by the EA on 23 February 2024. As there is no change to the site layout, infrastructure, drainage or storage areas as a consequence of this permit variation, this information was not provided as part of the application as it remains unchanged.</p> <p>Following a meeting with the EA of 4<sup>th</sup> August 2025, the EA advised that whilst the information remains unchanged it is required to be submitted as part of the permit variation application, therefore, the following Figures that were submitted as part of Substantial Variation Application have been provided:</p> <ul style="list-style-type: none"> <li>● Appendix 1 - 1620013520-002 Dunton Bridge Street North Site Plan.pdf;</li> <li>● Appendix 2 - Drainage Plan.pdf</li> </ul> <p>The soil treatment area will be undertaken within the main building which will be located on hardstanding. Treatment bays are located within areas of kerbed hardstanding, Section 5 and 9 of the Permit Variation Application Report has been updated to explicitly state this.</p> <p>The areas of the site that are to store hazardous waste are shown in Figure 9.1 as the 'Asbestos Bays' and 'Bio/Non Haz Waste Treatment Bay' (this bay would be used for the treatment of hydrocarbon contaminated soils and non-hazardous waste).</p> <p>The information requested by the EA has been provided in the additional site plans or explicitly stated in the Permit Variation Application Report (attached). As the information has been requested, it is not considered necessary to compile all the information onto 'one plan' as this type of site plan was not requested during the previous Substantial Permit Variation Application that was accepted by the EA.</p>
<p><b>Unclear application request.</b></p> <p>3. Do you wish to make any variations to AR3 section 5.6 activity? If you do you will need to apply to vary this activity and make the relevant payment depending on the type of variation you</p>	<p>As discussed during the meeting of 4<sup>th</sup> August 2025, there is no plan to make any variations to AR3 Section 5.6 activity.</p> <p>As outlined in the permit variation application, and in response to question 2</p>

require.	<p>above, there is no proposed change to the site layout or infrastructure that would facilitate a change in storage capacity on-site.</p> <p>The proposed change is to increase the throughput of asbestos contaminated materials only (AR2 Section 5.3 activity).</p>
<p><b>Unclear application request.</b></p> <p>4. Do you still wish to increase your hazardous waste throughput in AR1 from 30,000- 110,000 tonnes?</p>	<p>There is no proposed change to the throughput for AR1 Section 5.3 activity.</p> <p>It is outlined in the Permit Variation Application that:</p> <ul style="list-style-type: none"> <li>• The maximum annual throughput for the site (i.e., total volume of hazardous waste and non-hazardous waste treated at the site) would be 110,000 tonnes</li> <li>• The maximum allowable annual throughput for hazardous waste (AR2 only) would be 110,000 tonnes</li> <li>• The maximum allowable annual throughput for non-hazardous waste would be 75,000 tonnes</li> </ul> <p>The above limits were proposed to give Dunton greater flexibility in adapting to business demands for non-hazardous and hazardous waste whilst not exceeding the capacity of material that Dunton can treat.</p>
<p><b>Unclear application request.</b></p> <p>5. Revise your general application support document to reflect accurate information for the application, after reviewing the above questions.</p>	<p>The Permit Variation Application Report has been updated to clearly state that the proposed increase in maximum allowable annual throughput for hazardous waste from 30,000 tonnes to 110,000 tonnes relates only to asbestos contaminated material (AR2).</p> <p>There is no change to the maximum allowable annual throughput for hazardous material proposed for bioremediation or storage of hazardous material as a consequence of this variation.</p> <p>Where necessary the Permit Variation Application Report has been updated to reflect the responses provided.</p>
<p><b>Further question post clarification.</b></p> <p>6. Provide the BAT assessment "1620013520-002 Dunton Bridge Street North BAT Assessment".</p>	<p>The BAT Assessment "1620013520-002 Dunton Bridge Street North BAT Assessment" has been provided in attachment to this response.</p>
<p><b>Further question post clarification.</b></p> <p>7. Provide justification on how this 3x increase in hazardous waste throughput will be managed</p>	<p>As discussed during the meeting of 4<sup>th</sup> August 2025 the proposed increase in throughput of hazardous material is associated with the processing of asbestos contaminated material. This volume of material can be processed utilising the current site processes and procedures without any proposed change to the site layout or infrastructure.</p> <p>As outlined in the Permit Variation Application, the Substantial Variation was originally prepared on the basis that 215,000</p>

tonnes of hazardous material would be processed at the site.
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We trust that the above information is sufficient to close out the outstanding information requested in the EA's emails of 1 August 2025 and 4 August 2025, allowing you to progress with the determination of the variation of the Permit, and we look forward to confirmation that the application is considered to have been duly made.

Please do not hesitate to contact me should you require any further information.

Kind Regards,

Billy

Classification: Confidential

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**From:** Naomi Daniel <[naomi.daniel01@environment-agency.gov.uk](mailto:naomi.daniel01@environment-agency.gov.uk)>

**Sent:** 04 August 2025 11:45

**To:** Billy Glasgow <[billy.glasgow@ramboll.com](mailto:billy.glasgow@ramboll.com)>; SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>

**Cc:** Lisa Jobling <[lisa.jobling@ramboll.co.uk](mailto:lisa.jobling@ramboll.co.uk)>; Richard Hadley <[richard.hadley@environment-agency.gov.uk](mailto:richard.hadley@environment-agency.gov.uk)>

**Subject:** RE: EPR/WE8923AB/V004 We Need More Information About Your Application

CRM:0831084

**Importance:** High

Dear Billy and Lisa,

Good morning

I can provide you with a response to your questions:

#### **EA Request 1**

I can confirm the charge I have provided for you is correct.

I have used section 8.3 of our charges scheme and 3.7 and 3.8 of our charging guidance to make this decision and checked with our charges lead. The percentage reduction does not apply to this variation with addition of a new activity.

[Environmental Permitting and Abstraction Licensing Charging Scheme 2022: version 1.6](#)  
[Environmental permits: when and how you are charged - GOV.UK](#)

**Provide further payment as advised in new deadline provided at the end of this email.**

#### **EA Request 4 and 5**

I can confirm that it is permissible to have the three tonnage requirements for the site.

Your request for this is now clear, thank you. I still need clarification on my other questions in relation to AR1 and AR3.

#### **Further question post clarification.**

Now I understand the tonnages you are asking for I have some concerns about this 3x increase for hazardous waste throughput. I understand from your application that all

management plans were assessed for the last variation with a capacity of 215,000 tonnes per annum and therefore this increase in tonnages has little further assessment.

**6.** Provide the BAT assessment “1620013520-002 Dunton Bridge Street North BAT Assessment”.

Your application confirms there is no change to operating hours or process, no increase in area or additional equipment and no reassessment of emissions to air. With the process time for hazardous waste involving 16-week process this cannot be speeded up.

**7:** Provide justification on how this 3x increase in hazardous waste throughput will be managed

I provide 10 working days for your reply to all my questions from today, giving a **deadline of 11 August 2025**.

I trust this is clear and our meeting this afternoon may not be required after all.  
Please could you confirm?

Many thanks  
Naomi

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**From:** Billy Glasgow <[billy.glasgow@ramboll.com](mailto:billy.glasgow@ramboll.com)>  
**Sent:** 01 August 2025 14:21  
**To:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>; Naomi Daniel <[naomi.daniel01@environment-agency.gov.uk](mailto:naomi.daniel01@environment-agency.gov.uk)>  
**Cc:** Lisa Jobling <[lisa.jobling@ramboll.co.uk](mailto:lisa.jobling@ramboll.co.uk)>  
**Subject:** RE: EPR/WE8923AB/V004 We Need More Information About Your Application  
CRM:0831084

Hi Naomi,

Thank you for your email requesting clarification on the information provided as part of the Permit Variation Application for Dunton's Bridge Street North Facility.

We are in the process of reviewing the information and preparing responses to the items below.

To assist in the preparation of the response, could you please provide clarification on the items below:

1. **EA Request** - The correct application charge is £22,331. This leaves a balance of £3,965 to pay.

It is outlined in The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022 that: '(3) Where more than one application activity (other than a flood risk activity) is the subject of an application for a permit, the application activity charge for each activity, except the one for which the largest charge is payable, is reduced by –

*(b) 50% for any other activities which – (i) are reasonably associated with each other'*

Activities associated with the permit variation application - physical treatment of non-hazardous waste and hazardous waste treatment activity, are considered to be reasonably associated with each other. Therefore, the fee amount that was paid for the permit variation application was the full amount for the substantial variation (£14,401) plus 50% of the non-hazardous waste activity (£3,965) in accordance with the provision of the EA Charging Scheme. Could you confirm the correct fee amount based on the provisions of the EA's Charging Scheme?

**2. EA Request 4 and 5** – Define the maximum throughput volume for non-hazardous and hazardous waste

It is outlined in the permit variation application that:

- The maximum annual throughput for the site (i.e., total volume of hazardous waste and non-hazardous waste treated at the site) would be 110,000 tonnes
- The maximum allowable annual throughput for hazardous waste would be 110,000 tonnes
- The maximum allowable annual throughput for non-hazardous waste would be 75,000 tonnes

Would it be permissible to have three tonnage requirements for the site?

1. Maximum allowable tonnage for the site (this would be the upper limit for the total amount of material treated at the site)
2. Maximum allowable tonnage of non-hazardous material
3. Maximum allowable tonnage of hazardous material

The above limits were proposed to give Dunton greater flexibility in adapting to business demands for non-hazardous and hazardous waste whilst not exceeding the capacity of material that Dunton can treat.

If you could please provide a response to the above queries to assist in the finalisation of our response to your request it would be greatly appreciated.

In addition, in view of the timeline of the submission of the information, and the summer holiday period, it might be advantageous to have a brief teams meeting to discuss the points, do you have any availabilities Monday or Tuesday next week?

Kind Regards,

Billy

Classification: Confidential

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**From:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>

**Sent:** 01 August 2025 12:08

**To:** Lisa Jobling <[lisa.jobling@ramboll.co.uk](mailto:lisa.jobling@ramboll.co.uk)>

**Cc:** Naomi Daniel <[naomi.daniel01@environment-agency.gov.uk](mailto:naomi.daniel01@environment-agency.gov.uk)>; Billy Glasgow <[billy.glasgow@ramboll.com](mailto:billy.glasgow@ramboll.com)>

**Subject:** EPR/WE8923AB/V004 We Need More Information About Your Application

CRM:0831084





Dear Lisa Jobling

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/WE8923AB/V004**

**Operator: DUNTON TECHNOLOGIES LIMITED**

**Facility: Bridge Street North Waste Treatment Facility, BRIDGE STREET NORTH, SMETHWICK, B66 2BZ**

Thank you for your application received on 16/04/2025.

Your application is missing key information and a payment. We cannot process your application further until we receive this information. Please send the information below by the end of 15/08/2025.

Unfortunately, the application payment you sent is incorrect. The correct application charge is £22,331. This leaves a balance of £3,965 to pay. *Provide remittance advice showing this payment has been made and the reference for the payment by 15/08/2025.*

1.16.12 Physical Treatment of non-hazardous new application @ £7930

1.16.1.2 Section 5.3 (a)(i) hazardous waste installation- substantial variation @ £14,401

We also need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions.

We need to know

**Form C3**

1. You have listed EWC codes for wastes to be accepted under the waste operation for treatment of non-hazardous wastes. 19 08 99 “wastes not otherwise specified” is listed.

Provide justification for requesting this code. What wastes do you expect under this code, are you able to narrow this to specify the actual waste type to include with this code?

*This code is no longer on the standard rules permit SR2022 12*  
[SR2022 No 1: treatment of waste to produce soil, soil substitutes and aggregate - GOV.UK](#)

2. Figure 9.1 Site plan does not provide labels for hazardous waste storage area, does not indicate drainage, impermeable areas or infrastructure of bays. Provide this information within one plan.

**Unclear application request.**

You have applied for one new activity and a variation to the current activities.

New activity:

1.16.12 this be added to your permit WE8923AB V004, you have asked for 75,000 tonnes through put per annum and provided EWC codes. This is for recovery of non-hazardous waste.

1.16.1.2 You have also applied to vary your permit WE8923AB to increase the through put of hazardous waste from 30,000 tonnes to 110,000 tonnes per annum.

You have asked this increase is applied to AR1 and AR3.

AR1 is a section 5.3 activity, allowing biological treatment of hazardous waste for recovery. The wastes that can be treated under this activity are provided in Table S2.2, which provides an annual tonnage of 30,000 tonnes.

AR3 is a section 5.6 activity, allowing storage of hazardous wastes. It provides amounts in tonnes of hazardous waste that be stored for bioremediation and stored prior to treatment on site at any one time.

3. Do you wish to make any variations to AR3 section 5.6 activity? If you do you will need to apply to vary this activity and make the relevant payment depending on the type of variation you require.

You have also advised this increase is to cover both activities, hazardous and non-hazardous.

The hazardous waste and non-hazardous waste activities although on the same permit (multi activity permit) are separate and will be subject to their own tables within the permit with separate codes, tonnages and through put. You have applied for 75,000 tonnes for non hazardous waste.

4. Do you still wish to increase your hazardous waste throughput in AR1 from 30,000- 110,000 tonnes?
5. Revise your general application support document to reflect accurate information for the application, after reviewing the above questions.

The application charge may change depending on your responses. Please pay the amount asked for above. Should any further charges or a refund be required,



this will be resolved after your response to this request for further information.

### ***Areas that may need further information for determination***

*You have provided explanation in Section 6 for decontamination of bays to store either hazardous or non-hazardous wastes, preventing cross contamination. More detail will be required for determination on how these activities, even though sharing processing kit and bays are kept, clean separate from each other by signage, separation and organised pre acceptance and deliveries.*

*For the variation aspect of the application the determination officer will also require information demonstrating completion of Improvement Conditions IC1 and IC2 on the current permit.*

If you cannot provide the information in this time, please let us know and we will return the application.

Details of how to pay are given in Part F of the [application form](#).

Please reply directly to this email with your information and copy in [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk) / [naomi.daniel01@environment-agency.gov.uk](mailto:naomi.daniel01@environment-agency.gov.uk).

You must send us the information and payment by 15/08/2025.

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

Note: Our email system has a file size limit of 25MB, if your information exceeds this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

### **Why are we asking for this**

We require key information requested by our application forms before we can process applications. We want to give applicants who may have this information prepared but have forgotten to provide this an opportunity to send this to us quickly. Where this information has not been prepared, we will return applications

so applicants can re-apply when the information is ready.

### **What happens next**

If we receive the information by the deadline, we will process your application and allocate this to a Permitting Officer for checking. If we do not receive this information we will return your application.

### **Environment Agency Pre-application Service**

We recommend that you talk to us if you do not have the information prepared and wish to re-apply. We offer limited pre-application advice on how to prepare your application at no extra charge. If more help is needed, we also offer a discretionary enhanced pre-application service. This service is chargeable at a rate of £100 per hour plus VAT.

For further details and a pre-application request form, please see our website: <https://www.gov.uk/guidance/get-advice-before-you-apply-for-an-environmental-permit>

If you would prefer a paper copy of the pre-application request form, please phone our Customer Contact Centre on 03708 506 506.

If you have any questions, please phone me on 02087 7200395 or email [naomi.daniel01@environment-agency.gov.uk](mailto:naomi.daniel01@environment-agency.gov.uk).

Yours sincerely,  
Naomi Daniel

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