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Claudia Cridge  
Senior Permitting Officer  
Environment Agency

Via E-mail to: [resp-notifications@defra.gov.uk](mailto:resp-notifications@defra.gov.uk)

Date: 19<sup>th</sup> March 2024

Our Ref: *TA1061/12/01.R0*  
Your Ref: *EPR/BP3328SP/A001*

Dear Claudia,

**ENVIRONMENTAL PERMIT APPLICATION – INSTALLATIONS TRIAGE –  
ADDITIONAL INFORMATION: TARMAC TRADING LTD, WEEFORD QUARRY**

Thank you for the triage request for information received on 21<sup>st</sup> February 2024 to support the application for an Environmental Permit to operate an Asphalt Recycling Facility at Weeford Quarry, Sutton Coldfield. Responses to each of your information requests are outlined below in [blue](#) text.

**Information Requests**

1. Within Table 2 of section 1.6.1 of your supporting document (TA1061/05.R0), you state that you require waste code 17 03 02 Asphalt and Road Planings other than mentioned in 17 03 01. In Table 1a of form Part B3 you state a non-hazardous waste treatment capacity of 500 tonnes per year.

**Please confirm whether you wish to carry out a non-hazardous waste treatment activity.**

If you do wish to carry out treatment of non-hazardous waste, you will need to tell us whether you intend to treat more than 50 tonnes in any given day for the purpose of disposal. If the treatment of non-hazardous waste is for the purpose of recovery, then this will be a waste operation. The charge for the non-hazardous waste treatment activity will vary dependant on whether it is an installation activity or a waste operation. Please see the below options:

1.16.2.2	Section 5.4 (a)(ii) - non -hazardous waste installation – physico-chemical treatment for disposal.	£13,443
1.16.12	Physical treatment of non - hazardous waste.	£7,930

### Response

Waste Code 170302 is required and the application does seek to include a non-hazardous waste treatment activity on the permit. Your opening paragraph when referencing the relevant section of the application Form B3 quotes the non-hazardous waste treatment capacity incorrectly. It should state 500 tonnes per day, not per year as quoted above.

The purpose will be to therefore treat more than 50 tonnes per day of non-hazardous waste for the purpose of recovery. As such this will be a waste operation.

As exactly the same process is applied to the non-hazardous waste as to the hazardous waste, this qualifies for a reduction of 90% of the relevant standard application fee applicable to the physical treatment of non-hazardous waste, also bulleted within Section 2.12 of the guidance where it states that the calculation is 10% of the relevant application charge for the same activity carried out multiple times on the same site. This has already been accepted by the Environment Agency after previous discussions for other site-based permits of this type.

The additional fee payable therefore is £793.

- You have not included the relevant appropriate measures guidance within Table 3 in section 3a of form Part B3.

The relevant appropriate measures are:

- Chemical waste: appropriate measures for permitted facilities
- Non-hazardous and inert waste: appropriate measures for permitted facilities

**Please confirm that you will follow the appropriate measures detailed above and in full. Where there are any appropriate measures that you cannot follow, or where you are proposing alternate measures, you will need to explain this to us.**

Mixing hazardous waste with non-hazardous waste is prohibited. You will need to ensure you demonstrate this when providing information to answer this request.

### Response

On behalf of the client, we can confirm that they will follow the appropriate measures listed above in full. We can also categorically state that there will be no mixing of hazardous and non-hazardous waste. Each will be processed separately in accordance with the methods set

out in the application documents, as submitted.

3. In Table 2 of section 2 in form Part B3 you state that there is an isolation tank under the section titled Point source emissions to sewers, effluent treatment plants or other transfers off site.

Please confirm whether this is a discharge to sewer or effluent treatment plant (ETP), or whether this isolation tank is storage pending being tankered off-site.

If the discharge is to sewer or ETP, you will need to submit a H1 assessment of pollutants from this discharge.

### Response

The surface water management strategy for the proposed development can be summarised as follows.

The operational area will consist of an engineered surface, with graduated falls to towards perimeter drainage channels. These channels, in turn, run to a 'blind' isolation sump. Collected run off will then be used back into the cold foamed asphalt product manufacture process and when required, particulate emission control, i.e. dust suppression during prolonged dry spells.

Any surplus surface water run-off will be tankered off site for treatment at a suitably permitted Waste Water Treatment Works (WWTW).

- 4. Please provide a plan, detailing the drainage infrastructure present at your site.**

Provide any details where potentially contaminated water is collected and stored for sampling and testing, prior to discharge (under BAT AELs) or removal from site for disposal or treatment at another facility. Uncontaminated water from non-operational, processing and storage areas of your site should be kept segregated from other waters at the site and collected for inspection (or sampling and testing) prior to any discharge to sewer or surface water emissions points on site.

### Response

Please see **Drawing Reference Number TA1061/10/03 'Indicative Operational Layout Plan'** submitted as part of the application. This drawing illustrates the perimeter site bunding, general surface water falls and containment sump.

Should there be any further queries on this matter please let me know.

5. The supporting documentation for section 3b in form Part B2 states that the Technical-ly Competent Manager (TCM) has a Continuing Competency certificate for treatment of hazardous waste (TMH).

**Please submit to us the Certificate of Technical Competence for the named TCM.**

**Please also submit to us the renewed Continuing Competency certificate, as the one submitted expired 18/02/2024.**

### Response

Please see attached to this correspondence the original award COTC certificates for Kevin Marshall and Mark Foley.

Also attached are the latest Continuing Competency Certificates for both named competent managers.

6. **Please submit to us a process flow diagram based on the operations you carry out at your site.**

Where possible, please include details of inputs (Wastes/Raw Materials/Adjuncts), treatment processes and outputs (products, emissions – including abatement details, End-of-Waste products etc), so that we may fully understand how each stage of the treatment process works. Please provide the details with what has been agreed with the Environment Agency in extant previous Applications and provide any other details you have for individual Activities. Any flow diagrams should be clear and easy to follow, with a resolution that is visible and legible at A4 or A3 paper size.

### Response

By reviewing the application and its associated supporting documentation, this will more than enable the determining officer to understand the process that is being applied for. The treatment method is frequently regulated via the deployment of mobile plant for temporary operations which may last for a period of 24 months, but for more permanent plant locations (i.e. in excess of two years), a site-based permit application such as this is required. One such site permit is Tarmac's Armthorpe Quarry Operation (Environmental Permit Reference EPR/UP3231QS), which aside from site specifics, is the same operation as that being applied for here.

Notwithstanding the above, please find attached a process flow diagram which should highlight the main facets of the operation.

Should you require any further information to support this application, please do not hesitate to contact me.

Yours sincerely

*Mark L Griffiths*

Mark L Griffiths

Environmental Director

BSc(hons) MSc FGS CGeol MCIWM CEnv WAMITAB COTC 4LNH 4TSH

For and on behalf of The Sirius Group

Enc:

Annex 1 – CoTC Certificates

Annex 2 – Process Flow Diagram

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**ANNEX 1**  
CoTC Certificates



**Qualification Title:**

**WAMITAB Level 4 Diploma in Waste Management Operations : Managing  
Physical & Chemical Treatment - Hazardous Waste (QCF) - 4MPH**

**Qualification Accreditation Number:**

600/0331/5

**This Certificate is awarded to**

**Kevin Marshall**

**Awarded:** 03/04/2014

**Serial No:**23597/4MPH/1

**Authorised**

**Ray Burberry  
Qualifications Manager, WAMITAB**



00054287



## Credit certificate

This certificate determines credit awarded to:  
**Kevin Marshall**

### Units gained:

		Credit Value	Credit Level
Y6015875	Monitor procedures to safely control work operations	4	3
K6009711	Manage physical resources	3	4
M6009712	Manage the environmental impact of work activities	5	4
Y6021501	Control work activities on a waste management facility	9	3
A6021670	Manage the movement, sorting and storage of waste	7	3
K6021423	Procedural compliance	6	4
M6021424	Manage and maintain effective systems for responding to emergencies	19	4
D6021435	Control maintenance and other engineering operations	13	4
K6021504	Manage improvements to waste management operations	7	4
F6021606	Manage the reception of hazardous waste	15	4
H6021646	Manage site operations for the treatment of hazardous waste	22	4
J6021672	Manage the transfer of outputs and disposal of residues from hazardous waste treatment and recovery operations	13	4

**Awarded:** 03/04/2014

**Serial No.:** 23597/HSS3/1

### Authorised

Ray Burberry  
Qualifications Manager, WAMITAB

Regulated by

**Ofqual**

For more information see <http://register.ofqual.gov.uk>



Llywodraeth Cymru  
Welsh Government

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.



00054284





Certificate No. OCC4773

## Operator Competence Certificate

Qualification Title:

Managing Physical & Chemical Treatment - Hazardous Waste - 4MPTH

This Certificate is awarded to

**Kevin Marshall**

Awarded: 03/04/2014

Authorised

A handwritten signature in black ink, appearing to read "Alan James".

WAMITAB Chief Executive Officer

A handwritten signature in black ink, appearing to read "John".

CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



00054281

<b>Test title:</b>	Test for managers and professionals
<b>Candidate:</b>	Kevin Marshall
<b>CITB testing ID:</b>	CITB000562037
<b>Date tested:</b>	11 June 2013
<b>Test centre:</b>	48888
<b>Result:</b>	Pass

#### **Feedback**

Congratulations, you have passed this test.

Listed below are the areas where you have not answered all of the questions correctly. It is strongly recommended that these areas are revisited to ensure you have the full breadth of knowledge, even though you have passed your test:

- Excavations and confined spaces
- Environmental awareness and waste control
- CDM regulations

#### **Next step: carry on learning**

The Health, safety and environment test is an important step in the process towards competency in health and safety, but it is not the end of the process and there are many questions we did not ask you today, so make sure that you strive to keep your knowledge up-to-date.

#### **Next step: apply for a card**

A Health, safety and environment test pass is often a necessary requirement when applying to join a construction industry card scheme. Different schemes exist in different trades and professions. Membership of a relevant scheme helps you prove that you can do your job, and that you can do it safely. Access to construction sites may require a relevant scheme card.

Once you have passed your test, you should, if you have not done so already, consider applying to join the relevant card scheme. However, please be aware that you may need to complete further training, assessment and/or testing to meet their specific entry requirements.

To find out more about many of the recognised schemes you can:

- go online at [www.cskills.org/cardschemes](http://www.cskills.org/cardschemes)
- telephone Construction Skills Certification Scheme (CSCS) on 0844 576 8777
- telephone Construction Plant Competence Scheme (CPCS) on 0844 815 7274
- telephone Certificate of Competence of Demolition Operatives (CCDO) on 0844 826 8385
- telephone Construction Industry Scaffolders Record Scheme (CISRS) on 0844 815 7223.

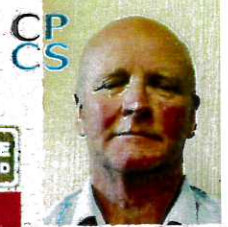
Continue your construction training with Plant, Health and Safety or Scaffolding courses from National Construction College - first-class instruction in more locations than any other training provider in the UK. Get FREE professional advice to find the right training and funding for you. Visit [www.cskills.org/training](http://www.cskills.org/training) or call 0344 994 4433.

CP Construction Plant  
CS Competence Scheme

MR K MARSHALL

Registration No: 01353188/1

Expires End See Over



**TRAINED OPERATOR**

CONSTRUCTION SKILLS CERTIFICATION SCHEME



MR K MARSHALL  
REG NO: 01353188 EXPIRES END: June 2019

The registered holder of this card holds the construction qualifications listed on the reverse

The authenticity of this card can be checked by telephoning: 0844 8157274

Registration No: 01353188

PLANT OPERATOR

CATEGORIES

Wheeled Loading Shovel  
Crusher  
Screener

EXPIRY DATE

08/08/2015  
27/06/2016  
27/06/2016

To upgrade this card to a Competent Operator card the relevant  
S/NVQ must be achieved

This card is issued in accordance with the terms laid  
out in the CPCS Booklet



Tel: 0344 994 4777 [www.cscs.uk.com](http://www.cscs.uk.com)

Registration No: 01353188

Environmental Mngr. Const. Level 4 Diploma

The cardholder has met the Health and Safety awareness  
requirements as laid out in the CSCS Scheme Booklet

 **constructing better health**  
IMPROVING WORKPLACE HEALTH  
[www.cbhscheme.co.uk](http://www.cbhscheme.co.uk)



CIWM

# Continuing Competence Certificate

This certificate confirms that

Kevin Marshall

Has met the relevant requirements of the Continuing Competence scheme for the following award(s) which will remain current for two years from 04/03/2024

TMH Treatment - Hazardous Waste

**Expiry Date:**  
**04/03/2026**

Verification date: 22/02/2024

Authorised:

Professional Services Director

Learner ID: 23597

Certificate No.: 5247343

Date of Issue: 04/03/2024

CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management





**Qualification Title:**

**WAMITAB Level 4 Diploma in Waste Management Operations : Managing  
Physical & Chemical Treatment - Hazardous Waste (QCF) - 4MPH**

**Qualification Accreditation Number:**

600/0331/5

**This Certificate is awarded to**

**Mark Daniel Foley**

**Awarded:** 24/06/2015

**Serial No:**24376/4MPH/1

**Authorised**

A handwritten signature in blue ink, appearing to read "Ray Burberry".

**Ray Burberry**  
Qualifications Manager, WAMITAB

Regulated by

**Ofqual**

For more information see <http://register.ofqual.gov.uk>



**Llywodraeth Cymru**  
**Welsh Government**

The qualifications regulators logos on this certificate  
indicate that the qualification is accredited only for  
England, Wales and Northern Ireland.



00087218



### Credit certificate

This certificate determines credit awarded to:  
**Mark Daniel Foley**

#### Units gained:

		Credit Value	Credit Level
Y6015875	Monitor procedures to safely control work operations	4	3
K6009711	Manage physical resources	3	4
M6009712	Manage the environmental impact of work activities	5	4
Y6021501	Control work activities on a waste management facility	9	3
A6021670	Manage the movement, sorting and storage of waste	7	3
K6021423	Procedural compliance	6	4
M6021424	Manage and maintain effective systems for responding to emergencies	19	4
D6021435	Control maintenance and other engineering operations	13	4
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H6021646	Manage site operations for the treatment of hazardous waste	22	4
J6021672	Manage the transfer of outputs and disposal of residues from hazardous waste treatment and recovery operations	13	4

**Awarded:** 24/06/2015

**Serial No.:** 24376/HSS3/1

#### Authorised

**Ray Burberry**  
Qualifications Manager, WAMITAB



For more information see <http://register.ofqual.gov.uk>



**Llywodraeth Cymru**  
**Welsh Government**

The qualifications regulators logos on this certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.



00087216



Certificate No. OCC5999

## Operator Competence Certificate

Title:

Managing Physical & Chemical Treatment - Hazardous Waste - 4MPH

This Certificate is awarded to

**Mark Daniel Foley**

Awarded: 24/06/2015

Authorised

WAMITAB Chief Executive Officer

CIWM Chief Executive Officer



The Chartered Institution  
of Wastes Management

This certificate is jointly awarded by WAMITAB and the Chartered Institution of Wastes Management (CIWM) and provides evidence to meet the Operator Competence requirements of the Environmental Permitting (EP) Regulations, which came into force on 6 April 2008.



00087214





# CIWM

## CIWM (WAMITAB) Qualifications

**IMPORTANT NOTICE - PLEASE RETAIN FOR YOUR RECORDS**

### Score Report

#### CIWM (WAMITAB) Continuing Competence Test

**Name:** Mark D Foley

**Date of test:** 06-Mar-2024

**Registration ID:** 472071287

#### Continuing Competency Test Results

<u>Activity</u>	<u>Number of Correct Answers</u>	<u>Score</u>	<u>Overall Grade</u>
Treatment Hazardous Waste	26 out of 30	87%	Pass

**A breakdown of your results is shown below.**

#### Generic Knowledge Test (GKT) Marks

<u>Section Title</u>	<u>Number of Correct Answers</u>
Generic Health & Safety	6 out of 6
Generic Legislation	5 out of 6
Generic Environmental Protection	5 out of 6

#### Activity Specific Test (AST) Marks

<u>Section Title</u>	<u>Number of Correct Answers</u>
Treatment Hazardous Waste	10 out of 12

**How are the results calculated?**

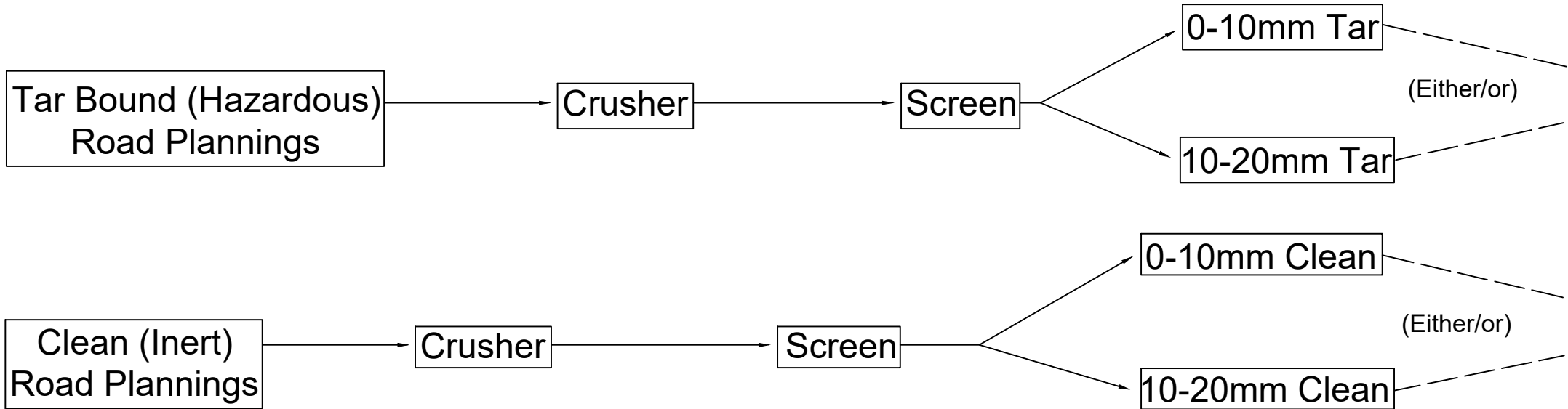


## **ANNEX 2**

# Process Flow Diagram

# Cold Foamed Asphalt Production Process

## Physical Pre-Treatment



## Cold Mixing Process

