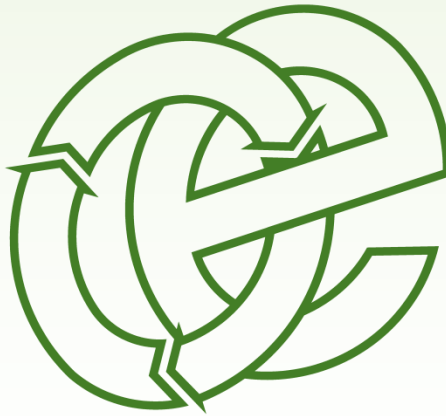


# NON-TECHNICAL SUMMARY

10 Merse Road, North Moons Moat, Redditch, B98 9HL

**Kaug Refinery Services Limited**

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1.5	05/03/2024	DY	KRS	Application copy

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# **1 Introduction**

## **1.1 General**

1.1.1 This Non-Technical Summary (NTS) accompanies a permit application being submitted on behalf of Kaug Refinery Services Limited (the operator).

1.1.2 The site is situated at 10 Merse Road, North Moons Moat, Redditch, B98 9HL. The site is located within an industrial area.

1.1.3 The proposals are for a facility for the extraction of precious metals from metal containing wastes, with a maximum annual waste throughout of 250 tonnes/annum.

## **1.2 Background/context of application**

1.2.1 The proposed operations are the same as those which have been undertaken for over 40 years by the applicant at their existing site, which have been regulated by the Environment Agency (EA) for over two decades under a waste Environmental Permit (EP) permit/license. To the present day, these have not been regulated as installation activities.

1.2.2 This application was previously submitted on 25/01/2023 which was prioritised for fast tracking. The activities previously applied for were Physical & Chemical treatment of Waste based on pre-application advice provided by the EA in 2020 for the same activities.

1.2.3 After submission of the application, the EA subsequently changed their position and directed that installation activities would now have to be applied for. It was advised by the EA that activities falling under Schedule 1 Part 2 of The Environmental Permitting (England and Wales) Regulations 2016 (“the permitting regulations”), namely activities under Section 2.2 Part A(1) (a) and Section 4.2 Part A(1)(f) were required to be applied for as the EA considered the operations to be installation activities. It is important to

note that the applicant's existing operation, which includes the same activities and is of the same scale, is not currently regulated as an installation activity.

- 1.2.4 Upon returning the application on the 18/05/2023, the EA did not provide any specific technical reasons as to why the activities were considered to fall under Schedule 1 Part 2 Section 2.2 Part A(1)(a) and/or Section 4.2 Part A(1)(f) of the permitting regulations, despite request, and therefore this information regrettably had to be sought via a Freedom of Information (FOI) request which was submitted to the EA.
- 1.2.5 The FOI response was received from the EA on 05/07/2023, within which they maintained their opinion that the activities are described under Schedule 1 Part 2 Section 2.2 and 4.2 of the permitting regulations. However, this was based on an officer opinion on what was 'likely' to be the case for each activity and therefore crucially lacked substantive evidence to qualify their opinion. Furthermore, this is a major change in regulatory position taken by the EA compared to the way they have regulated the existing operations for over two decades and also in contrast to the pre-application advice received in 2020.
- 1.2.6 The applicant and agent disagree with the EA interpretation of the permitting regulations, since the proposals are for the extraction of precious metals from wastes and are not therefore described under Section 2.2 Part (A1)(a) or Section 4.2 Part A(1)(f). However, the applicant has applied for installation activities as they are under pressure to advance the development.
- 1.2.7 All processes to be undertaken at the facility are for the recovery of non-ferrous metals from wastes and as such, the activity within Section 4.2 Part A(1)(f) hasn't been applied for in this application as this specifically excludes activities undertaken as part of any other activity listed within the permitting regulations. The use of acids are for recovery of precious metals. Therefore, as the Section 2.2 Part (A1)(a) activity is being applied for, which covers the production of non-ferrous metals, it is not appropriate to apply for the Section 4.2 activity. The EA consider that the acid processing operation should be split into two parts such that two separate installation activities (and charges) should apply. We disagree that this is appropriate or reasonable, as an activity should

be described based on the primary purpose. In this instance, the primary purpose is to recover precious metals from wastes. Given the significant additional fee and subsistence fee implication, insufficient evidence has been provided by the EA to back up their assertion that the Section 4.2 activity also needs to be applied for.

1.2.8 Given the substantial additional application and subsistence fees associated with an installation application, the applicant opted to delay submitting the revised permit application until planning permission had been granted.

1.2.9 The EA stated in the previous return of application email that upon resubmission, 'we will fast track and allocate the application to an Installation permitting officer for duly making and determination'. We therefore expect this to be expedited accordingly.

## **2 Application proposals**

2.1 The operator is applying for the following activities under The Environmental Permitting (England and Wales) Regulations 2016:

- Schedule 1 Part 2, Section 2.2 Part A (1) (a) installation activity for the production of non-ferrous metals; and,
- Directly Associated Activity - Physical treatment of hazardous/non-hazardous waste (Charging Ref 1.16.12 of the Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022.

2.2 The facility will include a series of small scale thermal, chemical and physical processing operations for the extraction of precious metals from metal containing wastes, typically including the following wastes:

- Printed circuit scrap and edge connectors;
- Connectors, switches and pins;
- Reel to reel;
- Webbing & stamping scrap;
- Gold rags, wipes, bottles etc;
- Screen printing waste;
- Lithographic waste;
- China;
- Gold colour;
- Gold plating solutions and dragouts;
- Gold stripping solutions;
- Silver solutions;
- Platinum, Palladium and Rhodium solutions;
- Ion exchange resins;
- Filters;
- Carbon packs;
- Anodes;

- Polishings and sweeps;
- Lemels and cuttings;
- Bombing (stripping) solutions;
- De-burring;
- Fan dust;
- Polishing grain;
- Casting scrap;
- Crucibles; and,
- Clean scrap.

- 2.3 The annual throughput of the site is proposed to be <250 tonnes per annum. A large proportion of the waste received (approximately 165 tonnes), which originates from the UK printed circuit board manufacturing industry, will not be subject to chemical or thermal treatment on site and will be either sorted/batched, or shredded/batched and shipped on for further recovery. A much smaller quantity of wastes will be subject to thermal and chemical treatment for extraction of metals, anticipated to be less than 50 tonnes per year based on recent waste return data.
- 2.4 The site will include a number of processes to extract and recover various precious metals from wastes, including processes such as shredding, acid and alkali digestion, operation of a small scale thermal appliance for removal of non-metal contaminants and small scale metal melting processes. The metal melting processes and thermal appliance for metal decontamination will be regulated under a separate Part B permit, regulated by the Local Authority.
- 2.5 The site will include four emission points to air to dilute and disperse residual emissions from the processes. Environmental risks for these emission points have been fully assessed within the permit application, confirming that potential impacts will not be significant.



- 2.6 There will be no discharges to land, water or sewer from the process. Waste effluents will be contained in appropriately bunded areas prior to export from site for disposal or recovery elsewhere.
- 2.7 The site will be operated in accordance with a comprehensive Environmental Management System, ensuring that appropriate procedures and measures will be in place to ensure control of potential emissions to air, land and water.
- 2.8 The proposed recovery and disposal activities have been defined below in an EA formatted table for ease of reference.

Description of activities for waste operations	Limits of activities
<p><b>D15:</b> Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p><b>R13:</b> Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)</p> <p><b>R4:</b> Recycling/reclamation of metals and metal compounds</p>	<p>Treatment consisting of manual and mechanical sorting, separation, dismantling, shredding, shearing, compacting, baling, screening, crushing, packaging, washing, repair, refurbishment of waste into different components for disposal or recovery.</p> <p>Acceptance/treatment of hazardous waste shall not exceed more than 10 tonnes per day.</p> <p>Storage of hazardous waste will not exceed 50 tonnes at any one time.</p> <p>Treatment for disposal shall not exceed 50 tonnes per day, or if for a mix of recovery and disposal shall not exceed 75 tonnes per day.</p>

### 3 Documentation and fees

3.1 The table below outlines the application type and fees.

**Table 3.1 – Base Application Fee Table**

Charging Scheme Ref	Charging Scheme Ref & Description	Type of application (Ref)	Fee
1.12.4	Section 2.2 - non-ferrous metal production.	New Installation activity	<b>£16,001</b>
1.16.13	Physical treatment of waste	New Bespoke activity (50% of activity fee as associated waste activity)	<b>£3,965</b>

3.2 In addition to the above, the operator will be submitting additional documentation and the following table sets out the additional charges.

**Table 3.2 – Additional Application Fee Table**

General	Consideration	Fee
Noise & Vibration Management Plan	Required due to permitted activities	<b>£1,246</b>

3.3 Based on the above, the total fee payable on submission to the EA will be **£21,212**

3.4 The table below summarises the forms/documents required for this application.

**Table 3.3 – Application Form Reference Table**

Application Form	Question Ref	Document Ref
Part A	5C	Form A Appendix 4, Q4
Part B2	3	AJC WAMITAB
Part B2	3D	2765-010-A_EMS (Environmental Management System)
Part B2	5A	2765-010-02 & 2765-010-03
Part B2	5B	2765-010-E (Site Condition Report)
Part B2	5C	2765-010-C (Non-Technical Summary)
Part B2	5D	2765-010-B (Fire Prevention Plan)
Part B2	6	2765-010-D (Environmental Risk Assessment)
Part B3	1 & Table 2	2765-010-F – Supporting information document
Part B3	Table 3b & 3c	2765-010-F – Supporting information document
Part B3	4	2765-010-F – Supporting information document
Part B3	6	2765-010-F – Supporting information document
Part B4	1	2765-010-F – Supporting information document
Part B4	3B	2765-010-F – Supporting information document
All	All	2765-010-F – Supporting information document