

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

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**Justin Horne**

**Company Director, Kaug Refinery Services Limited**

**31 Green Street**

**Deritend**

**Birmingham**

**West Midlands**

**B12 0NB**

Application number: **EPR/BP3421SC/A001**

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 31/07/2024.

Send the information to either the email or postal address below by 4<sup>th</sup> October 2024. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: [REDACTED]

Postal address:

Permitting Support, NPS Sheffield

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Name	Date
[REDACTED]	05/09/2024

Authorised on behalf of the Environment Agency

## **Notes**

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

*The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.*

## Schedule

### 1. Emissions to Air – information informing the Air Quality modelling report

- a) Provide the parameters used to calculate the emission rates for emission point 'A2'

*We are unable to replicate the emission rates without this information and assess emissions from A2 for potential significant impacts.*

- b) Confirm that the three process lines, in the monitoring report (ATESTA - Stack emissions monitoring report, date 27/07/2023, ref JOB-759, version 1), Drying Line, Kettle Line Extraction and the Stripping Line Extraction are the only three that exit through emission point 'A3'

*You provided monitoring reports for the processes that exit to the atmosphere through A3 and they appear to have low concentrations. We require confirmation of no other process contributions via A3 to allow us to properly consider any potential significant effects on human health.*

### 2. Noise Impact Assessment (NIA) and Noise Management Plan (NMP)

- a) NIA elements: Source Sound levels and Mitigation

Provide an assessment, to include detailed calculations of the expected sound emissions and mitigation measures of the proposed Steam Boiler, Thermal and Alkali Flue exhaust stacks to ensure that sound emissions do not exceed the specific sound levels predicted at the surrounding noise sensitive receptors as set out within the NIA.

*You have measured outlet sound levels for extraction systems proposed for the facility. We consider there to be uncertainty in this method as sound emissions can be impacted by plant used, ducting sizing, length and flow rates as well as other factors. You have proposed an 11dB reduction in exhaust outlet emissions but have not set out detailed specification as to how this will be achieved within the NIA or NMP. Without the proposed reduction in exhaust stack sound emissions levels being achieved the facility is at risk of causing a significant adverse impact due to noise.*

- b) Noise Management Plan

Provide an updated noise management plan to include:

- i) detailed calculations of flue exhaust sound emission levels and detailed mitigation instead of the existing generic statement relating to the extraction system
- ii) Control measures to ensure that the roller shutter door is not open during the period 06:00 – 07:00

*In assessing the NIA submitted with the application, we noted that if the roller shutter doors are open during the 06:00-07:00 period there is a risk of a significant adverse impact. It is our recommendation that the applicant updates their noise management plan (NMP) to limit the opening of the roller shutter door until after 07:00.*

### 3. Waste codes (EWC codes)

- a) With reference, if necessary to our *Waste Classification* guidance (WM3 – link below) provide justification for the requested series of EWC codes you have applied to be accepted at this site that end in '99'.

*You have included at section 2.3 (page13) of your application supporting document (2765-010-F) a list of Waste Codes which are further allocated to stages of the process in Appendix VII (page220). This list requests waste types whose codes end in '99'. We do not encourage the use of '99' codes without justification due to their mis-use when waste types should be allocated a more specific code.*

[Waste classification technical guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

#### **4. Appropriate Measures Assessment for waste treatment activities**

##### Shredding Plant

- a) Provide an assessment for the shredding of printed circuit boards to show that all appropriate measures have been considered against our guidance WEEE Appropriate Measures for permitted facilities – link below.

*You provide a BAT Assessment in Appendix VIII of your application supporting document (2765-010-F) for the acid and alkali processes falling under S2.2 (i.e. against the NFM Bref). The waste treatment activities under which the shredding of printed circuit boards will be permitted, also require an assessment against the BAT equivalent guidance for waste activities known as Appropriate Measures for Waste Electronic and Electrical Equipment (WEEE).*

[Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities - 5. Waste treatment appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](#)

#### **5. Bunding arrangements – bund material**

- a) Provide evidence that all bunding where bricks or blockwork are used follows the guidance in CIRIA C736 *Containment Systems for the Prevention of Pollution* with particular reference to any coatings used to seal the brickwork on the inside of the brick bunds.

*You have included on site drawings (e.g. drawing number 2765-010-G) submitted as part of the supporting document (2765-010 -F) references to brick bunding for the external alkaline effluent storage tanks. The supporting document talks of all containment measures being met and “stored appropriately in bunded areas” but does not specify the construction materials of the bunds.*