Liu, Tamara

From: Greg Smith <greg.smith@csg.co.uk>
Sent: 22 February 2022 16:01
To: Murray, John
Cc: Dave Earl
Subject: CSG Duly making
Attachments: Blackburn EWC.xls; CSG Blackburn Site Plan.docx; CSG Blackburn Operational Plan.docx

Hello John

I've attached answers to the questions below surrounding the Blackburn permit application Ref EPR/HB3108TY/V003.

I still need to address the additional information regarding the FFP and will get this back to you asap.

Kind Regards

Greg Smith
Technical / Operations Manager

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From: Murray, John <john.murray@environment-agency.gov.uk>
Sent: 07 February 2022 16:16
To: Greg Smith <greg.smith@csg.co.uk>
Subject: CSG Duly making

Hi Gregg

I sent an email to Dave earl by mistake instead of you on the 2/2/22 informing him I would be determining your application.
My contact details below.

CSG Blackburn
Ref EPR/HB3108TY/V003

I will be determining your application. My contact details below. Before I can duly make application I will need the following information;

1 Summary of management system -More details needed about the process

The CSG Stanley Street, Blackburn facility is overseen by a working plan which explains the site operations and how they are monitored. The working plan is supported by a series of operational and factory procedures that are updated to reflect the individual on site tasks. All our operating and factory procedures are written to an ISO 14001 standard

Link to guidance https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

2 A summary of each storage/treatment activity, including details of the plant/infrastructure used and their storage/treatment capacities. Suitable layout plans labelled to identify storage tanks/bays/areas by waste type and storage capacity

I have attached a copy of our operational plan and our site plan which details the site operations, plant/infrastructure and storage areas. Storage areas A3 and A6 are currently not in use therefore the types of materials stored in each area may change as these areas become operational however the site layout will stay the same.

3 BAT assessment for the 2 listed activities, justifying that BAT has been applied e.g. treatment technology, equipment choice, abatement technology, energy efficiency, (if BAT conclusions are applicable then in line with the BAT conclusion document)? *(not necessarily assessed at this stage) where needed,* cost benefit analysis of different options, in line with Environment Agency guidance should be provided: https://www.gov.uk/guidance/best-available-techniques-environmental-permits
If BAT is not proposed justification must be provided

Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)
Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)

The technology on site is predominantly used to support the repack of waste for onward shipment to waste to energy facilities around Europe. The abatement technology etc. is considered to be BAT as per the recently submitted appropriate measures for permitted facilities, section 61.

3 Assessment of waste pre-acceptance; acceptance procedures; storage procedures, waste treatment method and infrastructure; (and for clinical waste monitoring procedures) against indicative BAT in sector guidance

All our operating and factory procedures are written to an ISO 14001 standard and are indicative to BAT in sector guidance

4 Two separate EWC waste lists for the listed activity and the waste activity.

See Attached x 2 – The crossed out EWC will not be required, the lighter coloured items are already on the permit and the ones in a darker font are new due to our waste to energy TFS's for Aerosols, Clinical & Waste Combustibles.

5 Accident management plan - The site is in an area with medium risk of flooding from rivers and sea, Flood Zone 2 for planners.

I am looking into this along side the additional questions surrounding the FFP and will reply with both shortly

If you can respond with 10 days please.

Regards

John Murray
National Permitting Service ♦♦♦♦ Part of National Operations
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