

## NON-TECHNICAL SUMMARY

Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS

### Recycling Lives Compliance Services Limited

|                   |             |                   |              |                 |    |
|-------------------|-------------|-------------------|--------------|-----------------|----|
| <b>Version:</b>   | 1.2         | <b>Date:</b>      | 06 June 2025 |                 |    |
| <b>Doc. Ref:</b>  | WORK-3421-C | <b>Author(s):</b> | EG           | <b>Checked:</b> | CP |
| <b>Client No:</b> | 3421        | <b>Job No:</b>    | 002          |                 |    |



# Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants



Oaktree Environmental Ltd, Lime House, 2 Road Two, Winsford, Cheshire, CW7 3QZ  
Tel: 01606 558833 | E-Mail: [sales@oaktree-environmental.co.uk](mailto:sales@oaktree-environmental.co.uk) | Web: [www.oaktree-environmental.co.uk](http://www.oaktree-environmental.co.uk)  
REGISTERED IN THE UK | COMPANY NO. 4850754

### Document History:

| Version | Issue date | Author | Checked | Description      |
|---------|------------|--------|---------|------------------|
| 1.0     | 02/05/2025 | EG     | CP      | Internal draft   |
| 1.1     | 19/05/2025 | EG     | CP      | Client comments  |
| 1.2     | 06/06/2025 | EG     | CP      | Application copy |
|         |            |        |         |                  |

## CONTENTS

|                                 |            |
|---------------------------------|------------|
| <b>DOCUMENT HISTORY:</b>        | <b>I</b>   |
| <b>CONTENTS</b>                 | <b>II</b>  |
| <b>LIST OF APPENDICES:</b>      | <b>III</b> |
| <b>LIST OF TABLES</b>           | <b>IV</b>  |
| <b>1 INTRODUCTION</b>           | <b>1</b>   |
| 1.1 NOTE                        | 1          |
| <b>2 APPLICATION PROPOSALS</b>  | <b>3</b>   |
| 2.1 VARIATION PROPOSALS         | 3          |
| <b>3 APPLICATION PROCESSES</b>  | <b>4</b>   |
| 3.1 PROCESS DESCRIPTION         | 4          |
| 3.2 ACTIVITIES                  | 7          |
| <b>4 PROPOSED EWC CODES</b>     | <b>10</b>  |
| <b>5 DOCUMENTATION AND FEES</b> | <b>13</b>  |
| 5.1 APPLICATION FEE             | 13         |
| 5.2 OTHER FEES                  | 13         |

## **List of Appendices:**

- Appendix I      -      Drawings**
- Appendix II     -      Process Flow Diagrams**
- Appendix III    -      ABE and ABTO approval**
- Appendix IV    -      Pre-application Advice**

List of Tables

Table 3.1 – Activities Table.....7

Table 4.1 - Proposed EWC Codes – Physical Treatment of Batteries.....10

Table 4.2 - Proposed EWC Codes - Hazardous Waste Storage.....11

Table 4.3 – Proposed EWC codes WEEE.....12

Table 5.1 – Application Fee Table .....13

Table 5.2 - Additional Application Fees Table - Charges for plans and assessments.....13

# **1 Introduction**

## **1.1 Note**

- 1.1.1 Oaktree Environmental Ltd have been instructed to prepare this non-technical summary on behalf of Recycling Lives Compliance Services Limited (the operator) to support a permit variation application for the Environment Permit (EP) EPR/FB3807SX which authorises waste operations at Recycling Lives Services Workington, Isabella Road, Workington, Cumbria, CA14 2JS.
- 1.1.2 The operator specialises in the recycling of WEEE and battery waste from various sources and has operated the application site for waste treatment since the permit was issued in January 2019. The operator is an Approved Battery Treatment Operator (ABTO) and Approved Battery Exporter (ABE) both approved by the Environment Agency in October 2024. Copies of the ABTO and ABE approval have been provided in Appendix III.
- 1.1.3 Waste is predominantly received on site from household waste recycling centres (HWRC's) / civic amenity sites, which comprises approximately 50% of the waste received. The other sources of waste include approved authorised treatment facilities (AATF) which accounts for approximately 40% of the waste and the remaining 10% from other waste recyclers and retailers.
- 1.1.4 The operator is proposing to add an additional treatment activity, increase the quantity of hazardous waste to be stored on site at any one time to >50 tonnes and also increase the quantity of hazardous batteries that are treated per day to >10 tonnes, meaning the site will fall under an installation activity in accordance with the following section of the Environmental Permitting Regulations:
- Schedule 1, Part 2 Section 5.6 Part A(1)(a) – Temporary or underground storage of hazardous waste and
  - Schedule 1, Part 2 Section 5.3 Part A(1)(ii) –disposal or recovery of hazardous waste.

- 1.1.5 Further information regarding the proposals included as part of this variation are included in Section 2.
- 1.1.6 Enhanced pre-application advice was obtained from the Environment Agency regarding the proposed application, a copy of the advice received has been included in Appendix IV.

## **2      Application proposals**

### **2.1      Variation proposals**

2.1.1      The proposed operations to be authorised under this permit variation are set out below:

- i)      Increase the hazardous waste storage capacity to 5,000 tonnes at any one time.
- ii)      Add a new hazardous waste installation activity under section 5.3 Part A(1) (a)(ii) of the Environmental Permitting (England and Wales) Regulations for the physico-chemical treatment involving the mechanical sorting and mechanical treatment of hazardous waste (batteries).
- iii)      Reduce annual throughput of waste accepted at the site to 25,000 tonnes per annum. This will comprise of approximately 20,000 tonnes for battery recycling and 5,000 tonnes of WEEE waste.
- iv)      Remove the End-of-Life Vehicle (ELV) activity that is currently authorised including removal of the relevant conditions relating to this.



## **3      Application processes**

### **3.1      Process Description**

3.1.1      The operator accepts portable batteries for mechanical processing, sorting and separation. Waste comprises mixed batteries including lead acid, alkaline, lithium, nickel metal hydride and nickel cadmium waste batteries.

3.1.2      The operator may also accept items of hazardous and non-hazardous WEEE including vapes for processing and storage. Processing of WEEE will involve manually dismantling items to remove batteries for further treatment.

3.1.3      Permitted operations will involve:

- a)    Manual sorting and separation.
- b)    Screening (using appropriate screening plant and vibrating conveyors).
- c)    Shredding (of batteries by chemistry).
- d)    Mechanical separation (via overband magnets and x-ray sorting).
- e)    Thermal processing (drying of shredded waste).
- f)    Air density separation (blower).
- g)    Ultra-sonic sieving.
- h)    Storage (prior to removal).

3.1.4      Once accepted, the following treatment procedure will be undertaken:

#### **BATTERY TREATMENT**

- a)    Prior to acceptance, loads will undergo an initial visual inspection in AREA A to check for compliance with the EP and for any non-conforming wastes. This area will remain clear out-side of operational hours. During this initial inspection a handheld thermography (infrared) camera will be utilised to identify any abnormal heat signatures or developing hotspots. Any hotspots discovered are removed and isolated / quarantined.

- b) Once accepted at the site, mixed loads will be stored in the appropriate storage area depending on source i.e. from HWRC's or AATF's etc...
- c) Mixed batteries undergo an initial sort via the sorting machine which utilises a vibrating feeder to separate batteries by size and type, see Drawing No. WORK/3421/05. There are two sorting machines on site, one for incoming loads from HWRC's and the other for AATF's. Both lines of plant are identical and provide the same process but ensure batteries remain segregated by source.
- d) The machine deposits batteries by size / type into containers beneath the vibrating grid. Any unspecified or larger batteries are deposited into separate containers for further processing via x-ray machine.
- e) Following the initial sort described above batteries undergo further processing and sorting via an X-ray machine. An advanced X-ray system scans the batteries to identify their internal chemistry.
- f) Batteries that have been sorted by chemistry will be stored in 1 tonne bulk bags with the exception of lithium batteries which will be stored in sealed barrels with vermiculite. Sorted batteries will either be removed from site by chemistry or processed further via shredding.
- g) Batteries to be shredded will be stored in AREA 10 prior to treatment. Shredding batteries breaks them down into smaller fractions allowing for separation of different materials within the battery such as metals, plastic and electrolytes.
- h) Hazardous and non-hazardous batteries will be shredded separately to ensure there is no mixing of residual waste produced as part of the shredding activity.
- i) Following shredding, the plant utilises a vacuum dryer to remove any residual moisture. A vacuum pump is used to lower the pressure inside the dryer. By reducing the air pressure, the boiling point of residual moisture is lowered, allowing it to evaporate at lower temperatures.
- j) The process of vacuum drying is particularly useful for removing moisture without applying excessive heat which could cause further adverse/chemical reactions. The controlled environment ensures that volatile organic compounds (VOCs) and harmful gases (if any) are safely removed without causing reactions that could lead to fires.

- k) The end result following drying is dry shredded material with significantly reduced moisture content.
- l) After vacuum drying, the material is processed through an air separator, which uses airflow to separate lighter materials (such as paper and plastic) from the heavier components. Paper and plastic are deposited into separate IBC containers ready for removal from site for further recycling.
- m) The remaining material primary consisting of metals (ferrous and non-ferrous) is processed through an Eddy Current Separator (ECS). The ECS utilises a high speed rotating magnetic rotor to create a magnetic field causing non-ferrous metals to be repelled and deposited out of the main material stream. Separated ferrous and non-ferrous metals are deposited into IBC containers for further processing off site.
- n) The final stage in the process utilises an ultra-sonic sieve. The sieve uses high-frequency sound waves to create very fine vibrations which separates black mass from any leftover residual material. Black mass is collected in a sealed IBC container beneath the processing line, separating the black mass allows for easier recovery keeping the black mass clean and free from contamination.
- o) The above separated fractions will be stored in the appropriate storage areas as shown on Drawing No. WORK/3421/03.

3.1.5 A process flow diagram illustrating the above processes has been provided, see Appendix II, these are also detailed within the site-specific Environmental Management System.

3.1.6 Please refer to the Environmental Risk Assessment (Doc Ref. WORK-3421-D) for site specific controls implemented at the site to ensure that there is no risk to the environment i.e. protected species, habitats, designated sites, wildlife sites, ground water etc.

## 3.2 Activities

3.2.1 As mentioned in paragraph 1.1.4 the operator is proposing to treat more than 10 tonnes of hazardous waste per day and store more than 50 tonnes of hazardous waste at any one time, therefore, making the site an installation. The limits of activities table overleaf has been extracted from a modern permit and includes the conditions outlined above, which are being proposed as part of this permit variation.

**Table 3.1 – Activities Table**

| Table S1.1 activities                          |                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity reference                             | Activity listed in Schedule 1 of the EP Regulations                                                                                        | Description of activities for waste operations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Limits of activities                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>AR1:</b><br>Physical treatment of batteries | S5.3 A1(a)(ii)<br>Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment | <p><b>R4:</b> Recycling / reclamation of metals and metal compounds</p> <p><b>R5:</b> Recycling / reclamation of other inorganic materials</p> <p><b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p> <p><b>D9:</b> Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12</p> <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>Treatment consisting only of manual and mechanical sorting (via x-ray machine), separation, screening, shredding of hazardous and non-hazardous waste batteries for recovery.</p> <p>Activities shall take place within a building on an impermeable surface with sealed drainage.</p> <p>Waste types as specified in Table 4.1</p> <p>The total quantity of waste accepted at the site shall be less than 25,000 tonnes per annum.</p> |

| Table S1.1 activities                                                               |                                                                                              |                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity reference                                                                  | Activity listed in Schedule 1 of the EP Regulations                                          | Description of activities for waste operations                                                                                                                                                                                                                                                                                            | Limits of activities                                                                                                                                                                                                                                                                                                                                                                            |
| <b>AR2:</b> Hazardous waste storage                                                 | S5.6 A1(a)<br>Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes | <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>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>From receipt of waste through to submission for treatment.</p> <p>All wastes must be stored on an impermeable surface with sealed drainage.</p> <p>Lead acid batteries shall be stored in containers with an impermeable acid-resistant base and a cover that prevents the ingress of water.</p> <p>No more than 5,000 tonnes of hazardous waste will be stored on site at any one time.</p> |
| <b>AR3:</b> Waste electrical and electronic equipment authorised treatment facility | -                                                                                            | <p><b>R4:</b> Recycling / reclamation of metals and metal compounds</p> <p><b>R5:</b> Recycling / reclamation of other inorganic materials</p> <p><b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced)</p>            | <p>Manual or mechanical dismantling of WEEE for the purpose of battery removal for processing of batteries in accordance with AR1 and AR2.</p> <p>No further treatment of WEEE will be undertaken other than the removal of batteries.</p> <p>Waste types as specified in Table 4.3</p> <p>The total quantity of waste accepted at the site shall be less than 25,000 tonnes per annum.</p>     |

| Table S1.1 activities                      |                                                     |                                                                                                                                                                         |                                                                                                                                                                                         |
|--------------------------------------------|-----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity reference                         | Activity listed in Schedule 1 of the EP Regulations | Description of activities for waste operations                                                                                                                          | Limits of activities                                                                                                                                                                    |
| Directly Associated activities             |                                                     |                                                                                                                                                                         |                                                                                                                                                                                         |
| <b>AR4:</b> Storage of non-hazardous waste | -                                                   | <b>R13:</b> Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced | Storage of non-hazardous batteries and residual waste produced as part of AR1.<br><br>Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. |

## 4 Proposed EWC codes

### 4.1.1 Proposed EWC codes

4.1.2 The following EWC codes in Table 4.1 are proposed to be included on the permit for AR1: Physical treatment of batteries. The EWC codes listed in Table 4.1 may undergo any of the treatments outlined in the limits of activities for AR1 as specified in Table 3.1.

**Table 4.1 - Proposed EWC Codes – Physical Treatment of Batteries**

| CODE      | WASTE TYPE                                                                                                                                     |
|-----------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>16</b> | <b>WASTES NOT OTHERWISE SPECIFIED ON THE LIST</b>                                                                                              |
| 16 02     | electrical and electronic equipment                                                                                                            |
| 16 02 13* | discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12                                         |
| 16 12 14  | discarded equipment other than those mentioned in 16 02 09 to 16 02 13                                                                         |
| 16 06     | batteries and accumulators                                                                                                                     |
| 16 06 01* | lead batteries                                                                                                                                 |
| 16 06 02* | Ni-Cd batteries                                                                                                                                |
| 16 06 03* | mercury containing batteries                                                                                                                   |
| 16 06 04  | alkaline batteries (except 16 06 03)                                                                                                           |
| 16 06 05  | other batteries and accumulators                                                                                                               |
| <b>20</b> | <b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b> |
| 20 01     | separately collected fractions (except 15 01)                                                                                                  |
| 20 01 33* | Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries       |
| 20 01 34  | batteries and accumulators other than those mentioned in 20 01 33                                                                              |
| 20 01 35* | discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (6)          |
| 20 01 36  | discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35                                    |

- 4.1.3 The following EWC codes in Table 4.2 are proposed to be included on the permit for AR2: Hazardous waste storage. The EWC codes listed in Table 4.2 will undergo storage as outlined in Table 3.1 limits of activities column.

**Table 4.2 - Proposed EWC Codes - Hazardous Waste Storage**

| <b>CODE</b> | <b>WASTE TYPE</b>                                                                                                                              |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>16</b>   | <b>WASTES NOT OTHERWISE SPECIFIED ON THE LIST</b>                                                                                              |
| 16 02       | electrical and electronic equipment                                                                                                            |
| 16 02 13*   | discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12                                         |
| 16 06       | batteries and accumulators                                                                                                                     |
| 16 06 01*   | lead batteries                                                                                                                                 |
| 16 06 02*   | Ni-Cd batteries                                                                                                                                |
| 16 06 03*   | mercury containing batteries                                                                                                                   |
| <b>20</b>   | <b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b> |
| 20 01       | separately collected fractions (except 15 01)                                                                                                  |
| 20 01 33*   | Batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries       |
| 20 01 35*   | Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components (6)          |



- 4.1.4 The following EWC codes in Table 4.3 are proposed to be included on the permit for AR3: Waste electrical and electronic equipment authorised treatment facility. The EWC codes listed in Table 4.3 may undergo any of the treatments outlined in the limits of activities for AR3 as specified in Table 3.1.

**Table 4.3 – Proposed EWC codes WEEE**

| <b>CODE</b> | <b>WASTE TYPE</b>                                                                                                                              |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>16</b>   | <b>WASTES NOT OTHERWISE SPECIFIED ON THE LIST</b>                                                                                              |
| 16 02       | wastes from electrical and electronic equipment                                                                                                |
| 16 02 09*   | transformers and capacitors containing PCBs                                                                                                    |
| 16 02 10*   | discarded equipment containing or contaminated by PCBs other than those mentioned in 16 02 09                                                  |
| 16 02 11*   | discarded equipment containing chlorofluorocarbons, HCFC, HFC                                                                                  |
| 16 02 12*   | discarded equipment containing free asbestos                                                                                                   |
| 16 02 13*   | discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12                                         |
| 16 02 14    | discarded equipment other than those mentioned in 16 02 09 to 16 02 13                                                                         |
| 16 02 15*   | hazardous components removed from discarded equipment                                                                                          |
| 16 02 16    | components removed from discarded equipment other than those mentioned in 16 02 15                                                             |
| <b>20</b>   | <b>MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS</b> |
| 20 01       | separately collected fractions (except 15 01)                                                                                                  |
| 20 01 21*   | fluorescent tubes and other mercury containing waste                                                                                           |
| 20 01 23*   | discarded equipment containing chlorofluorocarbons                                                                                             |
| 20 01 35*   | Discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components              |
| 20 01 36    | Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35                                    |

## 5 Documentation and fees

### 5.1 Application fee

5.1.1 Table 5.1 sets out the fees required for the application.

**Table 5.1 – Application Fee Table**

| <b>EPR Charging Scheme Ref</b> | <b>EPR Charging Scheme Ref &amp; Description</b>                                  | <b>Type of application (Ref)</b> | <b>Fee</b>     |
|--------------------------------|-----------------------------------------------------------------------------------|----------------------------------|----------------|
| 1.16.1.2                       | Section 5.3 (a) (ii) – hazardous waste installation – physico-chemical treatment. | Permit application               | £16,001        |
| 1.16.4                         | Section 5.6 – temporary or underground storage of hazardous waste.                | Substantial variation            | £12,167        |
|                                |                                                                                   | <b>TOTAL</b>                     | <b>£28,168</b> |

### 5.2 Other fees

5.2.1 Table 5.2 sets out the documentation to be submitted with this application.

**Table 5.2 - Additional Application Fees Table - Charges for plans and assessments**

| <b>General</b>                                                                       | <b>Consideration</b> | <b>Document &amp; Ref</b> | <b>Fee</b> |
|--------------------------------------------------------------------------------------|----------------------|---------------------------|------------|
| Forms Part A, C2, C3, C4 & F1                                                        | Mandatory            | N/A                       | N/A        |
| Drawings – Site Location Plan, Permit Boundary Plan, Site Layout Plan, Receptor Plan | Mandatory            | WORK/3421/01 - 04         | N/A        |
| Process Flow Diagram                                                                 | Mandatory            | WORK/3421/05              | N/A        |
| Evidence of technical competence                                                     | Mandatory            | WORK-3421-F               | N/A        |
| Environmental Management System                                                      | Mandatory            | WORK-3421-A               | N/A        |
| Fire Prevention Plan                                                                 | Mandatory            | WORK-3421-B               | £1,241     |

| General                                   | Consideration                                                                                      | Document & Ref | Fee           |
|-------------------------------------------|----------------------------------------------------------------------------------------------------|----------------|---------------|
| Emissions Management Plan                 | Not considered necessary due to operations being undertaken within an enclosed building.           | N/A            | N/A           |
| Odour Management Plan                     | Not considered necessary due to no malodorous waste being accepted                                 | N/A            | N/A           |
| Noise Management Plan                     | Not considered necessary due to the site location and operations being enclosed within a building. | N/A            | N/A           |
| Pest Management Plan                      | Not considered necessary due to the waste types accepted not likely to attract pests               | N/A            | N/A           |
| Habitat Assessment                        | Required due to the proximity of the site to a Special Protection Area (SPA)                       | N/A            | £779          |
| Environmental Risk Assessment             | Mandatory                                                                                          | WORK-3421-D    | N/A           |
| Best Available Technique (BAT) Assessment | Mandatory                                                                                          | WORK-3421-E    | N/A           |
|                                           |                                                                                                    | <b>TOTAL</b>   | <b>£2,020</b> |

5.2.2 Based on the above, the total fee payable to the Environment Agency is **£30,188**.

# Appendix I

## Drawings



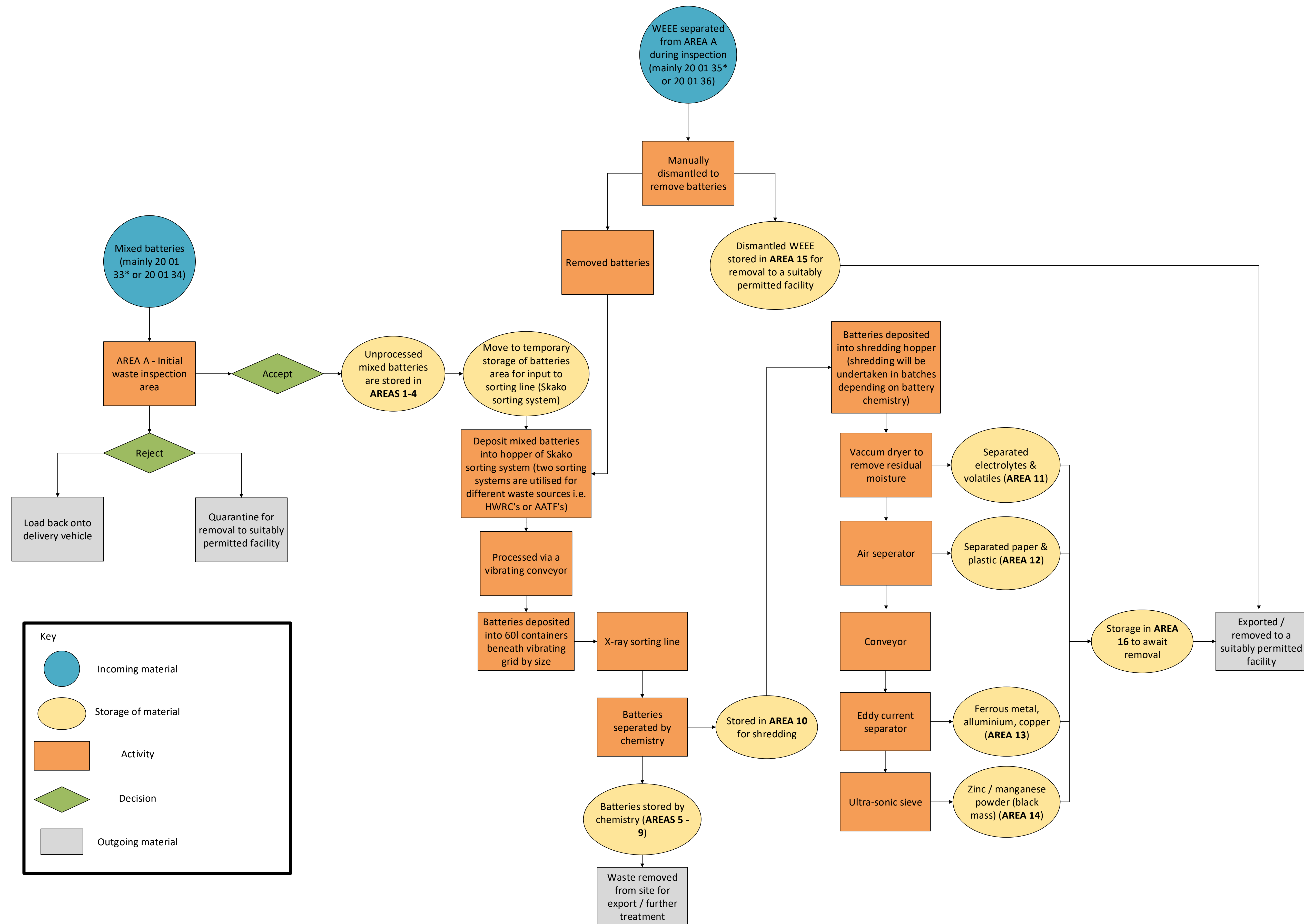




# **Appendix II**

## **Process Flow Diagrams**

Hazardous Battery Waste Treatment Process Flow Diagram - Drawing No. WORK/3421/05



# **Appendix III**

## **ABE and ABTO Approval**



Damien Snape,  
**Recycling Lives Compliance Services  
Limited,**  
1A Essex Street,  
Preston,  
Lancashire,  
PR1 1QE

**Our ref:** NPWD372016

**Date:** 08 October 2024

Dear Damien Snape,

**Waste Batteries and Accumulators Regulations 2009 (as amended)  
Notification of grant of approval of a waste battery exporter**

We have considered your application for approval as a waste battery exporter under The Waste Batteries and Accumulators Regulations 2009 (as amended) (*'the Regulations'*).

**Waste Portable Batteries**

We hereby grant approval to Recycling Lives Compliance Services Limited to operate as an approved battery exporter for waste portable batteries. Your approval extends to the following specified overseas sites only:

|                                      |             |
|--------------------------------------|-------------|
| <b>ABE operator approval number:</b> | BE2510709BE |
|--------------------------------------|-------------|

| <b>Overseas site name &amp; address</b>                                                 | <b>Amount of evidence notes (tonnes)</b> |
|-----------------------------------------------------------------------------------------|------------------------------------------|
| SNAM,<br>35 Rue de La Garenne,<br>SAINT-QUENTIN-FALLAVIER,<br>38070,<br>France          | N/A: No evidence being issued            |
| Saubermacher Recycling GmbH,<br>Brockmannstrasse 39,<br>OFFENBACH,<br>63075,<br>Germany | N/A: No evidence being issued            |
| SNAM,<br>Av. Jean Jaures,<br>VIVIEZ,<br>12110,<br>France                                | N/A: No evidence being issued            |

Your approval is subject to the conditions specified in Part 2 and Part 4 of Schedule 4 to the Regulations. Your approval applies only to the named exporter for the specified overseas site only.

Your approval is valid from 01 January 2025 and ends on 31 December 2025, unless it is otherwise suspended or cancelled.

The approval allows you to issue evidence notes for waste portable batteries which you export for treatment or recycling at these specified overseas sites. You must issue evidence notes in accordance with the Regulations. You must not issue evidence for batteries unless it can be lawfully sent to and received at the intended site in the country of destination.

### **Waste Industrial and Automotive Batteries**

We hereby grant approval to Recycling Lives Compliance Services Limited to operate as an approved battery exporter (ABE) for waste industrial and automotive batteries. Your approval extends to the following specified overseas sites and categories only:

Your approval covers the following sites and categories only:

| <b>ABE operator approval number:</b> |                                                                                            | BE2510708BE           |
|--------------------------------------|--------------------------------------------------------------------------------------------|-----------------------|
|                                      |                                                                                            |                       |
| <b>Battery category</b>              | <b>Overseas site name and address</b>                                                      | <b>Limit (tonnes)</b> |
| Automotive & industrial              | SNAM,<br>35 Rue de La Garenne,<br>SAINT-QUENTIN-FALLAVIER,<br>38070,<br>France             | Over 150 tonnes       |
| Industrial only                      | Saubermacher Recycling<br>GmbH,<br>Brockmannstrasse 39,<br>OFFENBACH,<br>63075,<br>Germany | Over 150 tonnes       |
| Automotive & industrial              | SNAM,<br>Av. Jean Jaures,<br>VIVIEZ,<br>12110,<br>France                                   | Over 150 tonnes       |

Your approval is subject to the conditions specified in Part 2 of Schedule 4 to the Regulations. Your approval applies only to the named operator for the specified approved overseas sites only.

Your approval is valid from 01 January 2025 and ends on 31 December 2025, unless it is otherwise suspended or cancelled.

The approval allows you to export waste automotive and industrial batteries for treatment and recycling to these specified approved overseas sites.

### **Suspension and cancellation of approval**

We may suspend or cancel your approval where it appears to us that you have failed, or are likely to fail, to comply with any of the conditions of approval. Suspension or cancellation may extend to one or more of your overseas sites, or may apply to your whole approval. Your whole approval will cease to have effect if you cease to be a battery exporter, or you request that your approval should be cancelled.

You must notify us immediately, in writing, of any changes to the details submitted with your application. If you wish to export to any additional overseas sites you must submit an application to extend your approval to cover these sites, which will incur a charge of £110 per additional site.

You must ensure that all international shipments of waste batteries are in accordance with the Waste Shipments Regulations. More information on this can be found on our website at <https://www.gov.uk/guidance/importing-and-exporting-waste> or by contacting our International Waste Shipments team on 01925 542 265 or emailing to [AskShipments@environment-agency.gov.uk](mailto:AskShipments@environment-agency.gov.uk).

This approval does not replace any other environmental authorisation that you may have for the sites. You must continue to comply with these and other relevant legislation.

Please contact Josh Andrews on 020 847 476 08 if you have any queries.

Yours sincerely



**Farah Hussain  
Senior Technical Officer  
Producer Responsibility Regulatory Services**

Damien Snape  
**Recycling Lives Compliance Services  
Limited**  
1a Essex Street,  
Preston,  
Lancashire,  
PR1 1QE

**Our ref:** NPWD372016  
**Date:** 04 October 2024

Dear Damien Snape,

**Waste Batteries and Accumulators Regulations 2009 (as amended)  
Notification of grant of approval of a waste battery treatment operator**

We have considered your application for approval as a waste battery treatment operator under The Waste Batteries and Accumulators Regulations 2009 (as amended) (*the Regulations*).

**Waste Portable Batteries**

We hereby grant approval to Recycling Lives Compliance Services Limited to operate as an approved battery treatment operator for waste portable batteries. Your operator approval number is **BT2510711BT**.

Your approval covers the following site only:

| Site name and address                                                                             | Individual site approval number | Amount of evidence notes (tonnes) |
|---------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------|
| Recycling Lives Compliance Services Ltd,<br>Isabella Road,<br>Workington,<br>Cumbria,<br>CA14 2JS | BS2510712BS                     | Over 15 tonnes                    |

Your approval is subject to the conditions specified in Part 2 and Part 3 of Schedule 4 to the Regulations. Your approval applies only to the named operator for the specified approved site only.

Your approval is valid from 01 January 2025 and ends on 31 December 2025, unless it is otherwise suspended or cancelled.

The approval allows you to issue evidence notes for waste portable batteries which you accept at this site for treatment and recycling. You must issue evidence notes in accordance with the Regulations.

## Waste Industrial and Automotive Batteries

We hereby grant approval to Recycling Lives Compliance Services Limited to operate as an approved battery treatment operator for waste industrial and automotive batteries. Your operator approval number is **BT2510710BT**.

Your approval covers the following site and categories only:

| Site name and address                                                                             | Battery category        | Individual site approval number | Limit (tonnes)  |
|---------------------------------------------------------------------------------------------------|-------------------------|---------------------------------|-----------------|
| Recycling Lives Compliance Services Ltd,<br>Isabella Road,<br>Workington,<br>Cumbria,<br>CA14 2JS | Automotive & industrial | BS2510713BS                     | Over 150 tonnes |

Your approval is subject to the conditions specified in Part 2 of Schedule 4 to the Regulations. Your approval applies only to the named operator for the specified approved site only.

Your approval is valid from 01 January 2025 and ends on 31 December 2025, unless it is otherwise suspended or cancelled.

The approval allows you to treat and recycle waste industrial and automotive batteries which you accept at this site for treatment and recycling.

### Suspension and cancellation of approval

We may suspend or cancel your approval where it appears to us that you have failed, or are likely to fail, to comply with any of the conditions of approval. Suspension or cancellation may extend to one or more of your approved sites, or may apply to your whole approval. Your whole approval will cease to have effect if you cease to be a battery treatment operator, or you request that your approval should be cancelled.

You must notify us immediately, in writing, of any changes to the details submitted with your application.

This approval does not replace any other environmental authorisation that you may have for the site. You must continue to comply with these and other relevant legislation.

creating a better place  
for people and wildlife



Please contact Josh Andrews on 020 847 476 08 if you have any queries.

Yours sincerely

*F Hussain*

**Farah Hussain**  
**Senior Technical Officer**  
**Producer Responsibility Regulatory Services**

**Environment Agency**  
Producer Responsibility Regulatory Services. 99 Parkway Avenue, Sheffield. S9 4WF  
Tel: 020 847 476 08 Email: [Batteries@environment-agency.gov.uk](mailto:Batteries@environment-agency.gov.uk)

**customer service line 03708 506 506**  
**[gov.uk/environment-agency](http://gov.uk/environment-agency)**

# **Appendix IV**

## **Pre-Application Advice**

1a Essex Street  
Preston  
Lancashire  
PR1 1QE

Environment Agency, permitting support  
Centre, Quadrant 2, 99 Parkway Avenue,  
Sheffield, S9 4wf

Chris Parry

Date: 21/01/2025

Dear Chris Parry,

**Pre application advice – Enhanced service**

**Pre-application reference EPR/FB3807SX/P001**

**Site: Recycling Lives Workington, Isabella Road, Workington, Cumbria, CA14 2JS.**

Thank you for your pre application enquiry on 05/09/2024

I am pleased to provide you with your pre-application advice. This advice is based on the information provided on your pre application advice form, meeting and conversations/emails recorded on the following dates:

- Meeting on 10/01/2025
- Email on 06/12/2024, 09/01/2025 and 17/01/2025
- Telephone conversation on 20/01/2025

Following a review of the information discussed during the Teams meeting and your updated operations plan to include mechanical sorting (e.g., x-ray sorting) as part of the site operations. we can provide the following pre-application advice.

The Environment Agency have determined that as your site operations will now be undertaking mechanical sorting i.e. x-ray sorting to separate batteries by size, based on this understanding, the existing waste operation permit for your site will need to be varied to include the installation activity to operate as a multi regime permit under waste and installation. To increase your hazardous waste storage capacity from 50 tonnes to 100 tonnes under scheduled activity 5.6, referenced 1.16.4 in our charging scheme, a substantial variation charge of £12,167 will apply.

An installation permit application charge of £16,001 under Scheduled 5.3 (a) (ii) for hazardous waste installation involving physico-chemical treatment, referenced 1.16.1.2 will apply due to the inclusion of mechanical sorting (e.g., x-ray sorting) as part of the site operations.

A revised Fire Prevention Plan referenced 1.19.3 will also be required, with an associated cost of £1,241.

**customer service line**    **03706 506 506**  
**incident hotline**        **0800 80 70 60**

**floodline**        **03459 88 11 88**



A Habitats Assessment charge of £779 with reference 1.19.2 will be applicable due to the proximity of the site to a designated Special Protection Area (SPA) located approximately 250m from the site.

The Total cost of the variation will amount to **£30,188**.

The normal variation charge for Metal Recycling-Mixed metal activity reference 1.16.16 is not required for this variation due to the transition from a waste operation to an installation permit. As the mechanical sorting activity falls under Section 5.3 of the Environmental Permitting Regulations, this renders the waste operation variation unnecessary.

Your intent to relinquish the End-of-Life Vehicles (ELV) activity should also be reflected in the variation application, with any relevant conditions removed from the revised permit.

You must demonstrate in your application that you can meet the new storage requirements for hazardous waste at the increased capacity. This should include details of how you will manage the storage safely and in compliance with regulations.

Please submit your variation application, including the demonstration of compliance with the new storage requirements, and the revised Fire Prevention Plan.

Ensure the appropriate fees for the substantial variation, the installation permit application, Habitat assessment and the Fire Prevention Plan review are included in your application submission.

Regarding the yearly subsistence fee if the overall tonnage is staying at 75,000 or less for each individual activity then this would potentially fall under a single fee under 2.16.20, **£2,567 per year**.

You can accept up to 75,000 tonnes per annum under either the metal recycling (which includes the WEEE/Batteries) or ELV activities.

If the annual tonnage for either of the activities is above this then the subsistence would be under 2.16.19, **£4,006 per year**.

The subsistence charge for the installation (5.3) activity - hazardous waste treatment installation - single waste stream will be **£4,842**.

A revised Noise Impact Assessment (and associated Noise Management Plan) may be required if there is a change to the noise profile on site.

Useful links:

- [Fire prevention plans: environmental permits - GOV.UK](#)
- [Risk assessments for your environmental permit - GOV.UK](#)
- [Noise and vibration management: environmental permits - GOV.UK](#)
- [Control and monitor emissions for your environmental permit - GOV.UK](#)
- [Habitats regulations assessments: protecting a European site - GOV.UK](#)
- [Environmental permits and abstraction licences: tables of charges - GOV.UK](#)

Application Forms for a waste variation application:

Complete [part A: about you](#), [part C2: varying a bespoke permit](#), [part C4](#) to change a bespoke waste operation permit, along with [part F1: charges and declarations](#).

**customer service line**    **03706 506 506**  
**incident hotline**        **0800 80 70 60**

**floodline**        **03459 88 11 88**

You are also required to complete BAT Assessment since you are including an installation activity and complete [part C3](#) to change an installation permit.

### What this enhanced pre application advice covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permits: when and how you are charged - GOV.UK](#)

As part of this service, we have provided you with the following information:

|                                       |                                                               |
|---------------------------------------|---------------------------------------------------------------|
| <b>Application reference number</b>   | EPR/FB3807SX/P001                                             |
| <b>Type of Application</b>            | Substantial Variation                                         |
| <b>Application charge required</b>    | £30,188                                                       |
| <b>Forms required to be submitted</b> | Part A, part C2, part C3, part C4, part F1 and BAT Assessment |

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register

A complete application must contain the following information below:

|                    |                                                                                                                                                                                                                                                                                                                                               |
|--------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Declaration</b> | Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.                                                                                                                                                                    |
| <b>Site Plan</b>   | <p>Site plan must be clearly marked with the full site boundary.</p> <p>For water discharge activity permits your site plan must also show:</p> <ul style="list-style-type: none"> <li>• the sewage treatment plant</li> <li>• the sample point</li> <li>• the point where the sewage is discharged to the receiving surface water</li> </ul> |
| <b>Payment</b>     | Please note your application will not be processed until we receive the full payment.                                                                                                                                                                                                                                                         |

### Discharges to surface water and groundwater

**customer service line**    **03706 506 506**  
**incident hotline**        **0800 80 70 60**

**floodline**        **03459 88 11 88**

You may need an environmental permit if your application includes a discharge of liquid effluent or wastewater either into surface waters (rivers, streams, estuaries, lakes etc. – known as ‘water discharge activities’), or into or on the ground (such as spreading waste sheep dip or discharging treated sewage effluent to ground through an infiltration system – known as ‘groundwater activities’).

Wastewater can include water which has been used in the processing/treatment of waste, or contaminated rainwater which has come into contact with waste. You should discharge your wastewater to the public foul sewer whenever it’s reasonable to do so. You do not need an environmental permit from the Environment Agency to do this. However, you must check with your sewerage undertaker (usually your local water company) before you make a new connection or discharge to the public foul sewer. See [Discharges to surface water and groundwater: environmental permits](#) for more information.

If you do require a bespoke water discharge or groundwater activity permit the fee will be £7,183. There may be an add on fee of £3,774 for a specific substances assessment for a water discharge activity, or £1,546 for a groundwater activity depending on the type of discharge. See table 1.13 and 1.19 in the tables of charges [Environmental permits and abstraction licences: tables of charges](#) .

You will also need to complete application form B6 (new) or C6 (variation) along with the information requested on that form and submit it at the same time as the waste application forms detailed above in ‘How do I apply for a permit’. See the Apply for a bespoke permit section of [Discharges to surface water and groundwater: environmental permits](#) for more information.

If granted, the waste activities and water discharge or groundwater activities will be regulated by a single environmental permit.

## Exemptions

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has limits and conditions that you must meet.

To find out if there is an exemption for your waste operation, and check that you meet the conditions, read the [Waste Exemptions](#) guidance.

Future reforms to waste exemptions will mean exemptions cannot be registered at or adjacent to (where there is a direct link) permitted waste operations or installations. Waste exemptions cannot currently be used on a permitted installation. For further details including transition periods, please read [Waste Exemptions – Getting Ready for Change](#). We do not expect changes to the Environmental Permitting Regulations (EPR) before 2025. The exact date depends on parliament and its legislative programme.

## After you apply

**customer service line**    **03706 506 506**  
**incident hotline**        **0800 80 70 60**

**floodline**        **03459 88 11 88**

The information that you need to submit with your application is explained in the application form and its guidance. The Environment Agency will check that you have submitted this information and the correct application charges. This is to ensure we have enough information to start to determine your permit application

We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information cannot be provided within this time frame we will return your application with a list of what is missing.

We'll retain 20% of the correct application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. This is explained in the environmental permitting charges guidance.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

Once we have duly made an application we will start to determine it. This is when we do our technical checks. We may need to ask you for further information or additional documents at this stage.

Once an application is validated and duly made, it is ready to be allocated for determination.

The time it takes us to allocate an application depends on a number of factors, including the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques
- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment or water discharge or groundwater activity specific substances assessment.

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

### **What happens next?**

If you submit an environmental permit application, then please quote this pre-application reference number: **EPR/FB3807SX/P001**

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk)

**customer service line**    **03706 506 506**  
**incident hotline**        **0800 80 70 60**

**floodline**        **03459 88 11 88**

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue,  
Sheffield, S9 4WF

### **Scope of this advice**

We have only provided the specific advice you requested based on the information provided. We cannot provide advice on all aspects of your application, so it is important you read all available online guidance and the application forms to ensure anything not covered within this advice is considered as part of your application.

It is important to remember:

- this is advice, we are not agreeing anything at this stage
- we have provided this advice based on the limited information we have about your proposals at this time
- we have only provided the advice you specifically requested
- we may need to request additional information when we have a full application

### **Disclaimer**

The advice given is based on the information you have provided and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site-specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste and installation activities only.

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

### **Enhanced pre application cost estimate**

At this stage the pre-application advice is expected to cost up to £500 plus VAT. An invoice will be sent separately.

### **This pre-application request is now closed.**

We consider this pre application request is now closed however if you have any questions regarding this letter, please contact [PreApplicationService@environment-agency.gov.uk](mailto:PreApplicationService@environment-agency.gov.uk).

If you require additional enhanced pre-application advice please complete our [online form](#).

**User research request - opportunity to participate in the development of the Environment Agency online customer portal**

**customer service line**    **03706 506 506**  
**incident hotline**        **0800 80 70 60**

**floodline**        **03459 88 11 88**

The Environment Agency is developing a new Online Customer Service which will support individuals, businesses, and representatives in the application process. The Service will also create and provide an account to help you manage the requirements of their environmental permissions\*.

We looking to recruit people who have **experience with environmental permission application/s** and would be interested in taking part in **user research** to give feedback on new designs and features to assist with future service development. This experience could be anything from applying for a new bespoke or new standard rules permission yourself or managing aspects of them.

If you are interested in taking part in either of these activities email [applypermissions@environment-agency.gov.uk](mailto:applypermissions@environment-agency.gov.uk)

*\*The term permission is being used to cover licences, permits, permissions and registrations.*

*As per our privacy notice [Environmental permits privacy notice](#), you do not need to take part in this user research.*

Yours sincerely,

**Andrew Salifu**

**Permitting Officer – Installations – Medium Combustion Plant**

**[Andrew.Salifu@environment-agency.gov.uk](mailto:Andrew.Salifu@environment-agency.gov.uk)**

**Mobile +44 (0) 7350370520**