

Liu, Tamara

From: Roddy Lewis <roddy@silverwoodsltd.co.uk>
Sent: 14 December 2021 10:14
To: Haines, Thomas
Subject: RE: Application Received - EPR-HP3299VV

Hi Thomas, SUCCESS, we have it confirmed that 03 03 07 should be used. The 99 code was given to the waste when it was combined and mixed with other materials, but the process has been changed since then.

In regards to the haz codings, these were applied to the waste transfer part of the permit before the mixing and blending operation. The 2 are separate. The 19 02 04 and 10 13 12 need to remain on the HCI. The haz codes are unique in that they are for materials permitted on a standard rules mobile plant permit to be landspread for agricultural benefit.

Thanks
Roddy

From: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Sent: 13 December 2021 12:19
To: Roddy Lewis <roddy@silverwoodsltd.co.uk>
Subject: RE: Application Received - EPR-HP3299VV

Hi Roddy,

Thanks for the update – any conversations would be great, however I doubt this would change the panels decision, however I can certainly put anything to them in terms of this one.

We don't usually contact area officers at the duly-making stage, however I can figure out who it is and try to get in touch for some more info. Is there any issues with the last bit about the HCI codes?

Many thanks,

Thomas.

Thomas Haines, BSc, GradiEMA

Permitting Officer | South West Area

National Permitting Service | Part of Operations – Regulation, Monitoring and Customer

Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH

Contact | External: 02030 254 131 | Mobile: 07879 117504 Internal: 34131 | Email: Thomas.Haines@environment-agency.gov.uk

Working days: Monday to Friday, usually 7:30am-3:30 pm.

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From: Roddy Lewis <rodny@silverwoodsltd.co.uk>
Sent: 13 December 2021 10:10
To: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Subject: RE: Application Received - EPR-HP3299VV

Hi Thomas,

I think the site are having a meeting today to discuss the EWC for the biodegradable material. I am also trying to find the historical conversations with the EA that were had which helped them arrive at the '99 code in the first place. Is there any chance you could speak to the EA officer assigned to the site for some 'insider information'? I'll keep you updated.

Thanks
Roddy

From: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Sent: 01 December 2021 13:28
To: Roddy Lewis <rodny@silverwoodsltd.co.uk>
Subject: RE: Application Received - EPR-HP3299VV

Hi Roddy,

Hope all is well firstly.

Just wanted to give you a quick update on this one, as I've gone round a few teams to try and work out this 99 code ask and review work etc.

From what I've been told, we don't usually permit 99 codes in the newer biowaste work at all, and if 99 codes were to be proposed, there would need to be quite a lot of justification and testing/sampling (I believe for around a year or so). I just wanted to confirm if any sort of sampling/data has been done at all with this new waste stream? If not, would the operator be happy to remove the 99 code ask for this application?

Also, we've noted in the HCI portion of the current permit, there are 2 hazardous waste codes, which look to be linked to the activity being surrendered. Will these waste codes also be removed from the HCI – as technically this would turn the HCI into a Haz-waste transfer station at present, which would be a new activity.

I will be away from the 5-10th Dec, but will have some cover for my leave, and will hope to get a duly-making decision to you ASAP.

Many thanks,

Thomas.

Thomas Haines, BSc, GradIEMA
Permitting Officer | South West Area
National Permitting Service | Part of Operations – Regulation, Monitoring and Customer
Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH
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From: Roddy Lewis <rodny@silverwoodsltd.co.uk>
Sent: 19 November 2021 11:52
To: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Cc: Julian Silverwood <julian@silverwoodsltd.co.uk>
Subject: RE: Application Received - EPR-HP3299VV

Hi Thomas, after speaking to the site, yes its 03 03 99. Its an EWC they have been using for several years now. Currently, and unfortunately, as there are no more specific codes the only route for this material has been to send to landfill. Its seems crazy to subject a purposely designed biodegradable material to landfill implications. Composting and the recovery to brownfield sites would be a much better route.

Thanks

Roddy Lewis

Contracts Manager

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From: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Sent: 19 November 2021 11:26
To: Roddy Lewis <rodny@silverwoodsltd.co.uk>
Subject: RE: Application Received - EPR-HP3299VV

Hi Roddy,

Hope all is well firstly.

I just wanted to inquire if there was any news/update on the use of the 99 code, just so I can make sure we've got this one covered in terms of anything additional the operator may need to provide?

Many thanks,

Thomas

Thomas Haines, BSc, GradiEMA
Permitting Officer | South West Area
National Permitting Service | Part of Operations – Regulation, Monitoring and Customer

Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH

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From: Roddy Lewis <rodny@silverwoodsltd.co.uk>
Sent: 16 November 2021 12:53
To: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Cc: Cath Miller <agriorganics@hotmail.co.uk>
Subject: RE: Application Received - EPR-HP3299VV

Hi Thomas, thanks for the communication.
Since the submission of the application many months ago we have been approached by a customer called Innova, located just a few miles from the composting site in Wigton. They produce a biodegradable cellophane which is completely plant based which is sold all over the country.
They have offcuts of biodegradable cellophane, and 10miles down the road we have a composting facility and it seems to make perfect environmental sense to be able to compost the material at our site.

The coding however is 03 03 99 and it is not on our permit. So would it be a possibility to add this code during the determination, with it being added to the open windrow composting activity already in place?

Thanks
Roddy

From: Haines, Thomas <Thomas.Haines@environment-agency.gov.uk>
Sent: 16 November 2021 12:07
To: Roddy Lewis <rodny@silverwoodsltd.co.uk>
Subject: Application Received - EPR-HP3299VV

Dear Mr Lewis,

Hope all is well firstly,

Just to follow up from our conversation on Friday afternoon, just to let you know that I have picked this up from our work queue and will be looking at it for duly-making and determination processes.

Please feel free to get in touch with any questions, however I will aim to give you a duly-making decision as soon as possible.

Many thanks,

Thomas.

Thomas Haines, BSc, GradiEMA
Permitting Officer | South West Area

National Permitting Service | Part of Operations – Regulation, Monitoring and Customer
Environment Agency | Horizon House, Deanery Road, Bristol, BS1 5AH
Contact | **External:** 02030 254 131 | **Mobile:** 07879 117504 **Internal:** 34131 | **Email:** Thomas.Haines@environment-agency.gov.uk

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