

From: Chris Williamson
To: SM-Defra-RESP-noreply (DEFRA)
Cc: Zara Zahair; Andy Collier; Bryan Foster
Subject: RE: EPR/BP3025SC/V003 We Need More Information About Your Application CRM:0181010
Date: 08 November 2025 12:30:54
Attachments: image001.png
image012.png
QES Appropriate Measures and BAT Assessment November 2025_ISSJFD_081125.pdf

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Dear Zara,

Please see the attached BAT assessment.

I look forward to receiving your duly made confirmation.

Kind regards

Chris Williamson
Director
ProTreat Limited
T: 01952 306352
M: 07576 958088
E: cwilliamson@protreat.co.uk
W: www.protreat.co.uk

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From: SM-Defra-RESP-noreply (DEFRA) <RESP-noreply@defra.gov.uk>
Sent: 29 October 2025 15:54
To: Chris Williamson <cwilliamson@protreat.co.uk>
Cc: Zara Zahair <Zara.Zahair@environment-agency.gov.uk>
Subject: EPR/BP3025SC/V003 We Need More Information About Your Application CRM:0181010

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Environment Agency Logo



Dear Christopher Williamson,

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/BP3025SC/V003

Operator: QUALITECH ENVIRONMENTAL SERVICES LIMITED

Facility: Qualichem, Dock Road, West Float, Birkenhead, CH41 1DF

This is to confirm our call of 29/10/25

Thank you for your response regarding Part C3 of the application. However, we need more detailed information before we can progress. Where both measures are referenced, you must clearly explain how your operations meet the relevant criteria. You must confirm whether you intend to follow each applicable BAT conclusion or propose an alternative technique. For BAT conclusions you need to follow, you should provide evidence showing how you will either:

- Comply with the BAT conclusion and meet the associated emission levels (where applicable), or
- Provide alternative measures you intend to use and demonstrate these can meet the same level of environmental protection.

When responding to BAT requirements, it's important to provide clear and specific descriptions of how each BAT is being met. General statements such as "we follow BAT 4 by storing waste safely" are not sufficient. Instead, you should describe the actual techniques and procedures in place. For example: "We follow BAT 4 by storing hazardous waste in a designated bunded area with impermeable surfacing and sealed drainage. Storage capacity is calculated based on throughput, and incompatible wastes are segregated. Weekly inspections are carried out and recorded to ensure containment integrity."

This level of detail helps us assess whether your site is compliant and how environmental risks are being managed.

The following BAT conclusions are likely to apply to your activity:

Ref	Technique
BAT 1	In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS)
Bat 2	<ol style="list-style-type: none">1. Set up and implement waste characterisation and pre-acceptance procedures2. Set up and implement waste acceptance procedures3. Set up and implement a waste tracking system and inventory4. Set up and implement an output quality management system5. Ensure waste segregation
Bat 4	<p>Reduce the environmental risk associated with the storage of waste</p> <ol style="list-style-type: none">1. Optimised storage location2. Adequate storage capacity3. Safe storage operation4. Separate area for storage and handling of packaged hazardous waste
Bat 5	Reduce the environmental risk associated with the handling and transfer of waste
Bat 14	<p>To prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour</p> <ol style="list-style-type: none">1. Minimising the number of potential diffuse emission sources2. Corrosion prevention
Bat 21	<p>To prevent or limit the environmental consequences of accidents and incidents</p> <ol style="list-style-type: none">1. Protection measures2. Management of incidental/accidental emissions3. Incident/accident registration and assessment system

Please ensure your revised submission addresses each applicable BAT conclusion with sufficient detail and supporting evidence.

Please be aware that additional BAT conclusions may be identified during the determination process, and we may need to request further information or clarification at that stage.

Please reply directly to this email with your information and copy in zara.zahair@environment-agency.gov.uk

Postal address:
Integrated Permitting Services
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

You must send us the information and or payment by 05/11/25

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone me on 07385 223618 or email zara.zahair@environment-agency.gov.uk

Yours sincerely,
Zara Zahair

Permitting Officer
Regulated Industry (Installations)
Mobile Phone: 07385 223618
zara.zahair@environment-agency.gov.uk

Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



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