

**From:** Chris Williamson  
**To:** SM-Defra-RESP-notifications (DEFRA)  
**Cc:** Zara Zahair; Charlotte Pearson; Andy Collier; Bryan Foster  
**Subject:** RE: EPR/BP30255C/V003 We Need More Information About Your Application CRM:0181015  
**Date:** 20 November 2025 11:18:34  
**Attachments:** image001.png  
image002.png  
Delivered RE: EPR/BP30255C/V003 We Need More Information About Your Application CRM:0181015.msg  
Delivered RE: EPR/BP30255C/V003 We Need More Information About Your Application CRM:0181015.msg  
Read EPR/BP30255C/V003 We Need More Information About Your Application CRM:0181015.msg  
Qualitech Tank Draft H1 assessment.pdf  
PSCAPPINGSTQUAL1829\_Part\_C3\_Variation.pdf  
NFC BAT 14 Assessment.pdf  
Qualitech Form C3 Q2.pdf  
H1 Test v9.2 Qualitech EPR BP30255C\_C3Q2.xlsm

Dear Zara,

Further to my 17 November email, reproduced below, which attached the COTC files and proof of payment as now highlighted in yellow in my email below.

I telephoned you on the 18<sup>th</sup> November and left you a voicemail kindly asking you to confirm that the short extension to your deadline is acceptable. I asked if you could return my call. However, as I have not received a call or an email from you, we must now assume that our reasonable request to extend the deadline has been denied. I have attached the read and delivery receipts from my previous email.

I have now also attached the remaining documents requested in your 14<sup>th</sup> November email including the H1 assessment.

Could you please reply before 5pm tomorrow to confirm receipt of this email.

Regards

Chris Williamson  
Director  
ProTreat Limited  
T: 01952 306352  
M: 07576 958088

E: [cwilliamson@protreat.co.uk](mailto:cwilliamson@protreat.co.uk)  
W: [www.protreat.co.uk](http://www.protreat.co.uk)

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**From:** Chris Williamson  
**Sent:** 17 November 2025 16:00  
**To:** 'SM-Defra-RESP-notifications (DEFRA)' <RESP-notifications@defra.gov.uk>  
**Cc:** Zara Zahair <Zara.Zahair@environment-agency.gov.uk>; Charlotte Pearson <Charlotte.Pearson@environment-agency.gov.uk>; Andy Collier <andy@qualitechservices.co.uk>; Bryan Foster <bryan@qualitechservices.co.uk>  
**Subject:** RE: EPR/BP30255C/V003 We Need More Information About Your Application CRM:0181015

Dear Zara,

Thank you for sending your latest email after our earlier telecon.

When comparing this email with your previous email, it is clear the 'Duly Made' goalposts have been moved.

Your previous email cited the BAT references that needed to be addressed before the application could be duly made and your previous email also referred to requiring a response to other BAT points only after duly making / before final determination.

Our response to your previous email included BAT references that exceeded what you had asked for.

The Technical Competence information provided for this application is identical to that provided for the transfer application, which was approved. **The additional certificate is now attached.**

**I have attached the proof of payment for the additional fee** which you now believe to be relevant because the GIS check was not completed before you sent your previous email.

With regard to emissions to air, as we discussed, storage tanks have to breathe. This has been the case at this site for at least 3 decades and at every other liquid storage facility ever built. If tanks are not allowed to breathe, they explode or implode.

Every storage tank is an emission point, and this has been known to the Agency for the 30 years that the EA has been the regulator for this facility. The H1 assessment for facilities of this type effectively became redundant when the Appropriate Measures guidance applied BAT via the Regulation 61 review of these sector permits. In other words, even if a H1 assessment concludes that emissions are not significant, BAT still requires abatement.

All storage tank vents will be combined into a common vent header as a single emission point to air after abatement. In our experience, with other permits in this sector, the precise abatement details are a matter dealt with after the application has been duly made. This is due to the fact; the Agency does not set Installation emission limits for abated storage tank vents arising from the storage of waste lubricating oils. For example, see Exolum's 75ktpa waste Installation permit reference EPR/SP3496CX.

The H1 assessment previously carried out prior to the submission of the transfer application nearly 3 years ago, is no longer reliable. The Agency issued a new H1 model in April 2024.

To produce a new H1 assessment we require a short extension to your 21 November deadline to 26 November 2025. The other residual points will be addressed in our next email.

Could you please confirm your agreement to the extended deadline.

Regards

Chris Williamson  
Director  
ProTreat Limited  
T: 01952 306352  
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E: [cwilliamson@protreat.co.uk](mailto:cwilliamson@protreat.co.uk)  
W: [www.protreat.co.uk](http://www.protreat.co.uk)

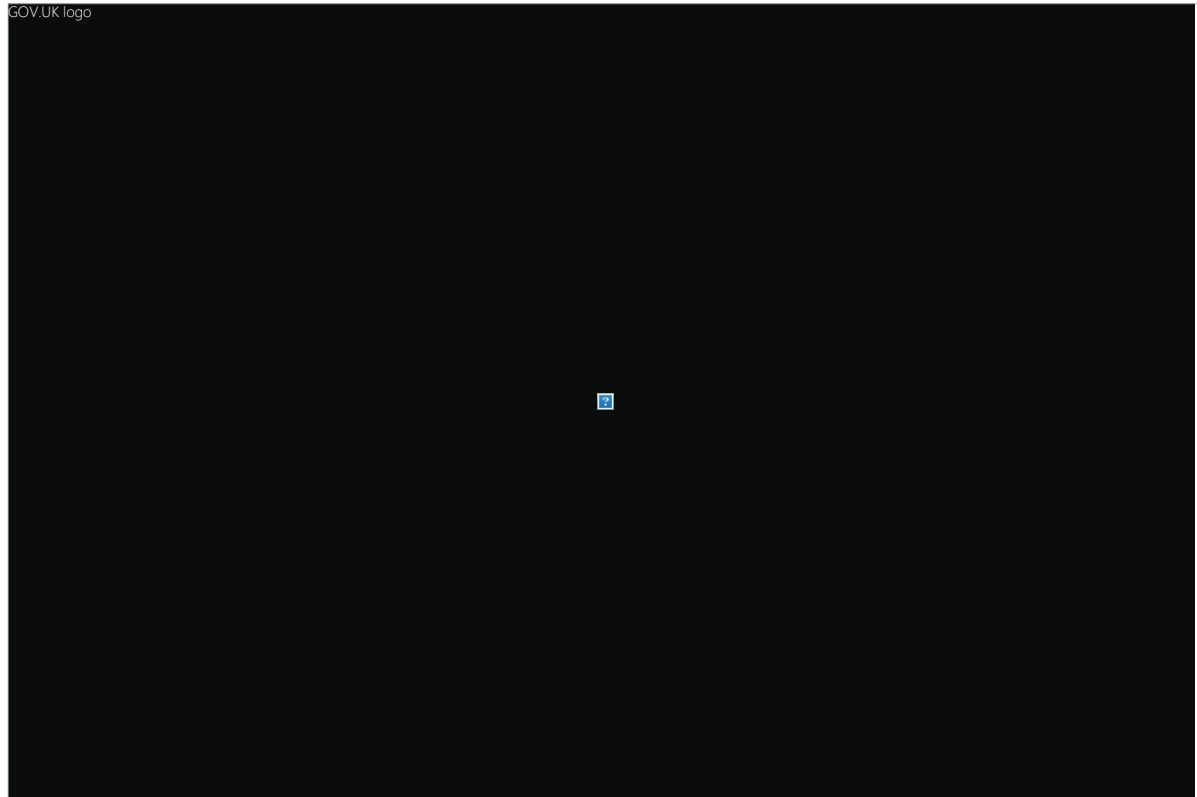
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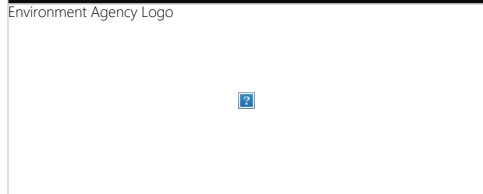


**From:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>  
**Sent:** 14 November 2025 14:44  
**To:** Chris Williamson <[cwilliamson@protreat.co.uk](mailto:cwilliamson@protreat.co.uk)>  
**Cc:** Zara Zahair <[Zara.Zahair@environment-agency.gov.uk](mailto:Zara.Zahair@environment-agency.gov.uk)>  
**Subject:** EPR/BP30255C/V003 We Need More Information About Your Application CRM:0181015

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Environment Agency Logo



Dear Christopher Williamson,

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference:** EPR/BP30255C/V003

**Operator:** QUALITECH ENVIRONMENTAL SERVICES LIMITED

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

The following is to confirm our conversation of 14/11/2025

Following a review of the documentation submitted, we require further information before we can progress your application.;

We note the following:

A Geographical Information System (GIS) check has identified habitats and designated areas that require a Habitats Regulations Assessment. This assessment is not included in your baseline application fee, therefore an additional payment of £779 is required.

Please provide us with more information to the following questions:

- Update Form C3, Question 2 regarding point source emissions to either list the point source emissions or state 'Not applicable'.
- Submit a copy of the H1 risk assessment of point source emissions to air if applicable.

*Reason: Form C3, Question 2 regarding point source emissions has not been completed. It is therefore unclear if there are point source emissions or not. If this is not applicable, indicate "N/A" in the form. This is important as your QES Appropriate Measures and BAT Assessment document refers to an H1 assessment being completed. However, this has not been submitted with the application. A H1 risk assessment should be completed for all point source emissions and submitted with the application. At present this aspect of the application is unclear.*

- Confirm if tanks used for the storage of waste oils are covered as required by BAT 14.
- Form C2, Question 3: Submit evidence of the primary (original) qualification certificate for Technical Competence to support the continuing competency certificate you have submitted.

Please reply directly to this email with your information and copy in [zara.zahair@environment-agency.gov.uk](mailto: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 21/11/2025

Pay online at this link [www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations](http://www.gov.uk/payments/permitting-applications-installations/permitting-application-payment-installations)

You need to create your own reference number. Your reference number must follow this format: PSCAPPINSTXXXXXXYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

You can send us this determination information by replying directly to this email with your information and copy in .

[psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk).

Without this additional information we will be unable to issue your permit.

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.

Yours sincerely,

**Zara Zahair**  
Permitting Officer  
Regulated Industry (Installations)  
Mobile Phone: 07385 223618  
[zara.zahair@environment-agency.gov.uk](mailto:zara.zahair@environment-agency.gov.uk)  
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