

Hopkin, Rach

From: Andy <am@cblrecycling.co.uk>
Sent: 13 December 2018 16:25
To: Hopkin, Rach
Subject: Re: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Rachel

The treatment and storage capacity for the storage and treatment capacity for batteries that are bulked for transfer is 75 tonnes even though we do not want to be this high it allows for onward issues encase of transport issues or treatment issues at other ABTO's etc.

I hope this answers you question

Regards
Andrew

From: [Hopkin, Rach](#)
Sent: Monday, December 10, 2018 12:41 PM
To: [Andy](#)
Subject: RE: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Andy,

There is just two more things I could do with clarification of please as I think there is still some confusion.

- With regards to the list of wastes submitted, there still seems to be reference to waste codes produced on site. The list of wastes I need for the permit are the list of wastes **accepted** on site only (i.e. the lead acid batteries) not the entire list of wastes accepted and produced on site (i.e. sulphuric acid). Unless it is that you also accept loads of sulphuric acid on site for consolidation and transfer.
- You have now supplied (thank you):
 - the maximum treatment capacity (40 tonnes per day – breaking lead acid batteries activity) and storage capacity (250 tonnes at any one time) for the hazardous waste lead acid batteries, and
 - The maximum treatment capacity (10 tonnes per day – consolidation for transfer activity) and storage capacity (10 tonnes at any one time) for the non-hazardous batteries and metals,
 - **However, we still need you to please supply the treatment capacity and storage capacity for the hazardous waste batteries that are solely 'bulked for transfer'**

Waste Code	Description of Waste
Battery treatment activity	
16 06 01*	Lead Batteries
16 01 19	Plastic
20 01 39	Municipal waste (household and similar industrial and institutional waste) including separately collected fractions
16 10 01	Aqueous liquid wastes containing dangerous substances
19 12 11*	Other wastes (including mixtures of materials) from mechanical treatment of waste containing dangerous substances
Bulking of Waste for transfer, treatment activity	
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
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
17 04 01	Copper, Bronze, Brass
17 04 02	Aluminium
17 04 03	Lead
17 04 05	Iron and Steel
17 04 07	Mixed Metals
17 04 07	Mixed Metals

Thank You & Kind Regards,

Rachel Hopkin BSc Hons Chemistry

Senior Permitting Officer – Installations – National Permitting Service - Part of Operations – Regulation, Monitoring and Customer | West Midlands Area

Environment Agency | Sapphire East, Streetsbrook Road, Solihull, B91 1QT

Contact | Email: rach.hopkin@environment-agency.gov.uk | Ext: 02030 252841 | Int: 52841 | www.gov.uk/environment-agency



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From: Andy [mailto:am@cblrecycling.co.uk]

Sent: 07 December 2018 13:04

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>

Subject: Re: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Rachel

I hope this answers all your queries

If we do a site condition report I will forward that at a later day

Regards

Andy

From: [Hopkin, Rach](#)

Sent: Thursday, December 06, 2018 12:10 PM

To: [Andy](#)

Subject: FW: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Andy,

I have now finished assessing your not duly made submissions. We still need the following information before we can duly make this application:

- Form Part C2
 - Q3b – technical ability – we need you to supply us with a copy of your certificate which includes hazardous waste treatment modules

The original certificate has been supplied, thank you. **We also need you to supply a copy of the up to date Continuing Competency certificate for Stephen May please.**
 - Q5a – site plan – we need you to revise and resubmit ensuring
 - the boundary marked includes all land on site required to carry out operations
this has now been included in the revised plan submitted in Not Duly Made Response, thank you.
 - all point source emission points are shown
is has now been included in the revised plan submitted in Not Duly Made Response, thank you.
 - the scale indicator is fully shown
this has now been included in the revised plan submitted in Not Duly Made Response, thank you.
 - the central National Grid Reference for the site is shown
this has now been included in the revised plan submitted in Not Duly Made Response, thank you.
 - the storage capacities are indicated on the layout plan
the waste storage capacities of each storage area have not been included in the revised plan submitted in the Not Duly Made Response, **please revise the plan and resubmit including these capacities**
 - the plastic granulator location is included
this has now been included in the revised plan submitted in Not Duly Made Response, thank you.
 - Q5e – adding an installation – we need you to answer this question for the new 5.6 activity.

This application proposes to add an installation as you wish to store more than 50 tonnes of hazardous waste at any one time which qualifies as a 5.6 activity (5.6 – temporary or underground storage of hazardous waste exceeding 50 tonnes) This question is applicable to your variation application, **we strongly advise that you provide a baseline report (potentially via a desktop study) in line with H5 Guidance Site Condition Reports, for the site to ensure that any existing contamination does not become your responsibility at the point of permit surrender.** However, the non-submission of this document will not prevent the application from being duly made.

- Form Part C3

- Table 1a – types of activities

- We need you to confirm the required increase to the hazardous waste storage capacity

Background: the non-technical summary states that the required increase is to a maximum of 250 tonnes at any one time, table 1a of form C3 states a maximum of 450 tonnes at any one time.

This is still unclear. This activity (5.6 – temporary or underground storage of hazardous waste exceeding 50 tonnes) applies to the storage capacity for incoming hazardous waste (hazardous waste batteries), not the hazardous waste (sulphuric acid) generated by the hazardous waste treatment activity (battery dismantling/breaking). **We need you to please provide the maximum storage of incoming hazardous waste the site can store at any one time.**

- We need you to confirm the activity maximum throughput capacity for the following treatment activities

- Battery dismantling

This has been answered in the Not Duly Made Response to be 40 tpd, thank you.

- Bulking of hazardous wastes prior to transfer

This is still unclear. You have provided confirmation that the sites annual throughput is 12,000 tonnes, however you seem to have included waste sulphuric acid and plastic which will be produced as a result of the battery breaking activity. **The required throughput is for solely waste acceptance weights, and needs separating out into:**

- **Hazardous waste treatment – hazardous battery dismantling (the capacity of the hazardous waste treatment activity, in tonnes of accepted hazardous waste batteries per day)**
 - **Hazardous waste treatment – hazardous battery bulking/repackaging for transfer (the capacity of the hazardous waste bulking activity, in tonnes of accepted hazardous waste per day)**
 - **Non-hazardous waste treatment – non-hazardous battery and metal bulking/repackaging for transfer (the capacity of the non-hazardous waste bulking activity, in tonnes of accepted non-hazardous waste per day)**

- We need you to include and confirm the maximum non-hazardous waste storage capacity on site

This has not been supplied, **please confirm the maximum amount of accepted non-hazardous waste that can be stored on site at any one time.**

Please feel free to call me to discuss these questions if you have any doubts on the required information.

Could you let me know the likely date you could provide these submissions please?

Thank You & Kind Regards,

Rachel Hopkin BSc Hons Chemistry

Senior Permitting Officer – Installations – National Permitting Service - Part of Operations – Regulation, Monitoring and Customer | West Midlands Area

Environment Agency | Sapphire East, Streetsbrook Road, Solihull, B91 1QT

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From: Hopkin, Rach

Sent: 26 November 2018 17:15

To: 'Andy' <am@cblrecycling.co.uk>

Subject: FW: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi again Andy,

Sorry! I've just seen that the supporting documents are included in the application form files, apologies.

I will take a look at these submissions and let you know if we need anything else to be able to duly make this application as soon as possible.

Thank You & Kind Regards,

Rachel Hopkin BSc Hons Chemistry

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From: Hopkin, Rach

Sent: 26 November 2018 17:07

To: 'Andy' <am@cblrecycling.co.uk>

Subject: RE: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Andy,

The not duly made letter (please find attached for ease) requested additional supporting documents and revisions to a number of the supporting documents previously submitted for this application, for example:

- Form Part C2
 - Q2a – this question needs to be answered with a substantial variation rather than normal variation
 - Q2b – changes or additions to existing activities - Table 1 – we need you to include the following Scheduled Activity into this table
 - 5.6 – temporary or underground storage of hazardous waste
 - Q2f – low impact installation – this question needs to be answered
 - Q3b – technical ability – we need you to supply us with a copy of your certificate which includes hazardous waste treatment modules

- Q5a – site plan – we need you to revise and resubmit ensuring
 - the boundary marked includes all land on site required to carry out operations
 - all point source emission points are shown
 - the scale indicator is fully shown
 - the central National Grid Reference for the site is shown
 - the storage capacities are indicated on the layout plan
 - the plastic granulator location is included

Background: the current boundary seems to exclude to 'gas cage' storage area. The 'containment tank' included in the submitted drainage plan is classed as a point source emission and needs to be included on the main plan as such (any 'clean' surface water run-off to sewer emission points also need to be included).

Any point source emissions to air (such as extraction of acid gases from the bulking of acid from batteries and acid storage tank vents and vent on the plastic granulator) also need to be shown on the plan.

- Q5e – adding an installation – we need you to answer this question for the new 5.6 activity.
- Q6 – Environmental Risk Assessment – we need you to answer this question and revise and resubmit your risk assessment ensuring it has been completed for a bespoke site and includes the identification of any habitat (SAC, SPA, Ramsar, SSSI, MCZ) sites; protected species and habitats; AONB; Local Wildlife Sites; or National Parks and the assessment of any potential impacts.

Let me know if you have any problems.

Thank You & Kind Regards,

Rachel Hopkin BSc Hons Chemistry

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From: Andy [<mailto:am@cblrecycling.co.uk>]

Sent: 26 November 2018 16:11

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>

Subject: Re: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Rachel

The documents should all be in with the applications if you need them separately let me know any I can upload them on there own

Andy

From: [Hopkin, Rach](#)

Sent: Monday, November 26, 2018 3:54 PM

To: am@cblrecycling.co.uk

Subject: FW: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Andy,

I've received revised Form Parts, C2, C3 and F1 thank you.

Are there more supporting documents to follow?

Thank You & Kind Regards,

Rachel Hopkin BSc Hons Chemistry

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From: Hopkin, Rach
Sent: 26 November 2018 12:59
To: 'am@cblrecycling.co.uk' <am@cblrecycling.co.uk>
Subject: Form C3 - City Batteries Limited - Albion Yard - EPR/GB3701SW/V002 - PAS YP3638QM - New Bespoke

Hi Andrew,

As discussed please find attached a copy of your submitted Application Form C2.

[Here](#) is a link for you to upload files to our cloud based system also, I thought I would send this now as it will work for up to 30 days.

I have contacted my colleague regarding the transfer for this site and someone should be in touch with you about this soon.

Let me know if you need anything else.

Thank You & Kind Regards,

Rachel Hopkin BSc Hons Chemistry

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Environment Agency | Sapphire East, Streetsbrook Road, Solihull, B91 1QT

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