

## PSC Land

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**From:** Ed Brown <ed.brown@aae-ltd.co.uk>  
**Sent:** 08 March 2021 12:33  
**To:** Irons, Sue  
**Cc:** PSC Land; Matthew Lawman  
**Subject:** RE: Not Duly Made response due 8 Mar 2021 - bespoke waste application on behalf of Tetron Treatment Limited at Wharf Road Treatment Facility. Ref: EA/EPR/KB3007XP/A001 - EAWML 407457  
**Attachments:** 203162 TOP Final Mar21.pdf; 203162 OMP Mar 2021comp.pdf; Part B4 updated.pdf

Good afternoon Sue,

Please find response in red and attachments:

### Form Part B4:

#### 1.) Table 1a

For the 'Waste transfer station with treatment including inerts and excavation wastes' please confirm the maximum daily amount for D9. Please provide evidence you keep it under the I.E.D daily 50 Tonne threshold (Part A (1) (a) EPR legislation). **On behalf of the Operator, we confirm the maximum daily amount of D9 will be less than 50 tonnes per day threshold as per Part A (1)(a). I have updated the Part B4 to include this in Table 1a.**

2). You need to send us an Odour Management Plan (OMP). **Please find attached Odour Management Plan.**

- Non-Technical Summary gives maximum annual throughputs for 4 Areas (1,2,3,4). The Technical Standard & Operational Management Plan on occasions refers to Area 4 and also Areas 2 or 2a and 2b, and in 'Schedule 1 – Permitted Waste Operations' lists only 3 Areas.

We have currently interpreted the proposal as consisting of 3 distinct Areas:

- Area 1 - Non-Hazardous Wet & Mineral Waste Treatment Area
  - Area 2a - HCl Mixed Skip Waste Processing Area & Area 2b - Aggregate Crushing and Screening of Inert Waste (*which is technically connected to Area 2a as it treats materials received through the HCl mixed skip activity*).
  - Area 3- Asbestos Waste Storage Area **Yes, you're interpretation is correct.**
- Technical Standard & Operational Management Plan refers to *asbestos washing*: "3.31 The process waters are treated through a series of clarifiers and filters. The water management processes for both wet processing plant (soil washing and asbestos washing) is set out in Appendix B of the Operating Standard." **This is a typographical error. Please find updated 203162/TOP Revision A.**

Please can you confirm safe receipt and confirm 203162/TOP Revision A will supersede the original version?

Kind Regards,

Ed Brown BSc (Hons)  
**Principal Consultant**  
**BSc, MCIWM, Chartered Resource and Waste Manager**

**Please note the change of email address to [ed.brown@aae-ltd.co.uk](mailto:ed.brown@aae-ltd.co.uk)**

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**From:** Irons, Sue <susan.irones@environment-agency.gov.uk>

**Sent:** 22 February 2021 14:56

**To:** Ed Brown <ed.brown@aae-ltd.co.uk>

**Cc:** PSC Land <PSC@environment-agency.gov.uk>

**Subject:** Not Duly Made response due 8 Mar 2021 - bespoke waste application on behalf of Tetron Treatment Limited at Wharf Road Treatment Facility. Ref: EA/EPR/KB3007XP/A001 - EAWML 407457

Dear Mr Ed Brown

### **We need more information about your application by close of 8 March 2021**

Thank you for your application received on 4 January 2021. The following is to confirm our conversation of today Monday 22 March, as I was not able to speak to you last Friday.

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions.

#### Form Part B4:

##### 1.) Table 1a

For the 'Waste transfer station with treatment including inerts and excavation wastes' please confirm the maximum daily amount for D9. Please provide evidence you keep it under the I.E.D daily 50 Tonne threshold (Part A (1) (a) EPR legislation).

*Reason: Elsewhere in the application it indicates the activity/ies in Area 2 are for recovery [the intention]; however D9 is presented in this table 1a thereby indicating an intention to treat by either phys/chem or pre-treatment for incineration so the waste can be disposed.*

2). You need to send us an Odour Management Plan (OMP). This should meet the requirements of our H4 Guidance (<https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>).

To include, but not limited to:

- quantity limits (waste reception, in treatment)
- waste types and quantities, including description and EWC
- source(s) of waste(s)
- measures the operator will take to reduce odorous wastes being accepted onsite
- how long the waste is held before it is delivered – we need to know how old the waste is
- storage/ treatment method and location onsite
- storage time limits onsite
- associated monitoring and records for all of the above
- any emission points

- the potential receptors
- impact conditions which cause odour
- methods for the management of odorous materials
- details of how you will monitor odorous releases or the conditions which cause odour, and any parameters to be measured and trigger levels for corrective action.
- contingency measures and action plans to deal with any accidents, emergencies and other abnormal events which may result in odour pollution.

*Reasons:*

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#odour> advises that if you're applying for a bespoke permit for specified activities (including HCI) you will need to submit your plan with your application. As this site has an HCI you must write an Odour Management Plan that explains how they will prevent or minimise odour.

*The OMP should capture the measures the operator will take to reduce odorous wastes being accepted onsite, as well as those to prevent odour generating or spreading once accepted onsite.*

*In our regulatory experience some of the waste types you intend to take have medium or high odour potential and the application has also stated "Odorous waste and sludge processing and storage will operated within a full enclosure".*

Please send the information, quoting the above application reference, to me or [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk) or:

Permitting and Support Centre (P&SC)  
 Quadrant 2  
 99 Parkway Avenue  
 Parkway Business Park  
 Sheffield  
 S9 4WF

Please send the information within 10 working days of this letter. If we do not receive the information within 10 working days we will return your application.

If we do receive the requested information within 10 working days, we'll 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.

The applicant has overpaid (£25,612); therefore, once 'Duly Made' we will refund £7,911. The application fee breakdown is:

- HCI Transfer & Treatment and asbestos transfer station. This is charged as Hazardous waste transfer station + associated physical treatment = £7,969 + 50% of £7,930 = £11,934
  - Phys treatment of wet & mineral wastes: 10% of physical treatment fee £7,930
  - FPP + OMP + DEMP + NIA/NMP fees (£4,974)
- = £17,701 TOTAL

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

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This

maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

Not Duly Making issues which you may wish to address now:

While reading your application we noticed the following. You may wish to confirm/ clarify what they should read as in your Not Duly Made response covering email as they affect more than one supporting document:

- Non-Technical Summary gives maximum annual throughputs for 4 Areas (1,2,3,4). The Technical Standard & Operational Management Plan on occasions refers to Area 4 and also Areas 2 or 2a and 2b, and in 'Schedule 1 – Permitted Waste Operations' lists only 3 Areas.

We have currently interpreted the proposal as consisting of 3 distinct Areas:

- Area 1 - Non-Hazardous Wet & Mineral Waste Treatment Area
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  - Area 3- Asbestos Waste Storage Area
- Technical Standard & Operational Management Plan refers to *asbestos washing*: “3.31 The process waters are treated through a series of clarifiers and filters. The water management processes for both wet processing plant (soil washing and **asbestos washing**) is set out in Appendix B of the Operating Standard.”

If you have any questions please phone or email me.

Regards,

Sue Irons  
Permitting Officer (Waste), National Permitting Service - Birmingham hub  
**Environment Agency**



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Int. number: 32898

**Website:** [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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My flood incident role is: Incident Support Officer

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