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**From:** Mark Griffiths <Mark.Griffiths@thesiriusgroup.com>  
**Sent:** 14 February 2019 16:21  
**To:** Gosling, Laura  
**Subject:** RE: Permit application: Tarmac Trading Ltd, Asphalt Waste Recycling Facility, UP3231QS

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Laura

Further to your email below and our subsequent conversation, many thanks for getting in touch. Really pleased to see someone

As you can appreciate, I need to discuss a number of the points you raise below with our client before I am able to provide a full response.

However there are a couple of points I'd like to take the opportunity to respond to now;

*Unfortunately the application payment you sent is incorrect. The correct application charge is £22,097. As you have already paid £16,001, this leaves a balance of £6,096 to pay.*

I checked with the EA beforehand in relation to the application fee payable and they concurred with my calculation that £16,001 was the correct fee. I do find it incredulous that the revised fee being quoted now in your table below is more or less the same amount as an application fee for a non-hazardous landfill site with a hazardous mono cell when all that is being applied for is the recycling and recovery of road planings.

Notwithstanding this, from review of the calculation of application charges table provided, I believe that, at the very least, as the Non-Hazardous treatment activity description is exactly the same as that considered for Hazardous, then a 90% reduction should be applicable to this charge and not 50% as quoted. It is the same type of material being treated (road planings) and subjected to the same process, the only difference being the tar content.

Are you also able to provide the justification as to why a charge is levied in relation to a Habitats Assessment? We have already considered ecological sites within the supporting risk assessments and have considered that the habitats are not at risk from the proposed operation (Appendix 7 – Fugitive Emissions Risk Assessment).

*Part B3, Table 3a – You need to demonstrate compliance with the Waste Treatment Best Available Technique (BAT) reference document (BREF) (published August 2018) or demonstrate why this is not applicable to this installation.*

The proposed activity has been assessed for compliance against the relevant Sector Guidance Note S5.06 'Recovery and Disposal of Hazardous and Non-Hazardous Waste' as part of the application process and where appropriate to the operation under review, those items of relevant have been considered against sector Best Available Techniques (BAT). It should be noted (and as already acknowledged by the EA), the requirements of the Waste Treatments BREF mostly mirror those of S5.06 in any event and therefore consideration under S5.06 will have addressed the points of relevance.

I should have further feedback from the client tomorrow on the remaining items left outstanding from your correspondence below, and with this in mind, will hopefully have a response for you for when you are back in the office on Monday.

Speak soon

Kind regards  
Mark



**Mark Griffiths** | Environmental Director | Environmental

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**From:** Gosling, Laura <Laura.Gosling@environment-agency.gov.uk>  
**Sent:** 13 February 2019 13:29  
**To:** Mark Griffiths <Mark.Griffiths@thesiriusgroup.com>  
**Subject:** Permit application: Tarmac Trading Ltd, Asphalt Waste Recycling Facility, UP3231QS

Dear Mark,

**We need more information about your application and underpayment of application charge**

**Application reference: EPR/UP3231QS/A001**  
**Operator: Tarmac Trading Limited**  
**Facility: Asphalt Waste Recycling Facility**

Thank you for your application received on 20/11/2018.

Unfortunately the application payment you sent is incorrect. The correct application charge is £22,097. As you have already paid £16,001, this leaves a balance of £6,096 to pay.

Your application charge is calculated as follows:

Type of charge	Activity	Reference	Charge
Baseline activity	Section 5.3 – hazardous waste installation	Table 1.16, 1.16.1	£16,001
Additional installation activity	Section 5.6 – temporary or underground storage of hazardous waste	Table 1.16, 1.16.4 (90% reduction applies; see Part 2 8(3) of charging scheme)	£1,352
Waste operation	Physical treatment of non-hazardous waste	Table 1.16, 1.16.12 (50%	£3,965

		reduction applies; see Part 2 8(3) of charging scheme)	
Habitats assessment		Table 1.19, 1.19.2	£779

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:

1. Part B3, Table 1a – please split the annual throughput total of 200,000 tonnes per year into hazardous waste and non-hazardous waste.
2. Part B3, Table 3a – You need to demonstrate compliance with the Waste Treatment Best Available Technique (BAT) reference document (BREF) (published August 2018) or demonstrate why this is not applicable to this installation.
3. Part B3, Table 3c - You have indicated that Pulverized Fuel Ash (PFA) is a raw material to be used as a product additive. Please amend your management plan to include the use of PFA in the treatment process.
4. Part B3, Section 1 - We consider PFA to be a waste type (European Waste Catalogue code 10 01 wastes from power stations and other combustion plants). Please amend your management plan and list of wastes to include PFA as an accepted waste type or provide justification for excluding this from your list of wastes.
5. Site plan – You state in section 2.3.4 of your management plan that ‘clean planings’ will be stored in a separate, clearly identified location away from the tar bound planing stockpiles. Please amend your site plan to show these separate areas.

Please send the information, quoting the above application reference, to:

Email address: [psc@environment-agency.gov.uk](mailto:psc@environment-agency.gov.uk) or [laura.gosling@environment-agency.gov.uk](mailto:laura.gosling@environment-agency.gov.uk)

Postal address:

Permitting and Support Centre  
 Quadrant 2  
 99 Parkway Avenue  
 Parkway Business Park  
 Sheffield  
 S9 4WF

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form. If we don't hear from you, we must return your application.

When we receive the requested information and payment, 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. 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>

If you have any questions please phone me on 0208 4749912 or email [laura.gosling@environment-agency.gov.uk](mailto:laura.gosling@environment-agency.gov.uk)

Yours sincerely,

Laura Gosling

**Laura Gosling**

Permitting Officer, National Permitting Service

**Environment Agency** | Sapphire East, 550 Streetsbrook Road, Solihull, B91 1QT

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

External: 0208 474 9912

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