

Section 9



Kathrine Dowling
S.A.R. Metals Limited

Our reference: EPR/TP3821SN/P002
Date: 25/10/2024

Dear Kathrine,

Pre application advice – Enhanced service

Site: SAR (Site 2)

Thank you for your pre application enquiry on 19/09/2024

I am pleased to provide you with your enhanced level of pre-application advice. This advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Email on 23/10/2024

What this enhanced pre application advice covers

As part of this service we have provided you with the following information:

Application reference number	EPR/TP3821SN/P002
Habitats screening	Previously done
Documents attached	Annex 1 - Advice
Application charge required	£22,558.90
Forms required to be submitted	See Annex 1
Additional documents required	See Annex 1
Additional information	See Annex 1

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste and installations only.

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Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £500 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

We consider this pre application request is now closed however if you have any questions regarding this letter please contact Jake Walker, jake.walker@environment-agency.gov.uk.

If you require additional enhanced pre-application advice please complete our [online form](#).

We look forward to working with you on this project.

If you have any questions please call 03708 506 506.

User research request - opportunity to participate in the development of the Environment Agency online customer portal

The Environment Agency is developing a new Online Customer Service which will support individuals, businesses, and representatives in the application process. The Service will also create and provide an account to help you manage the requirements of their environmental permissions*.

We looking to recruit people who have **experience with environmental permission application/s** and would be interested in taking part in **user research** to give feedback on new designs and features to assist with future service development. This experience could be anything from applying for a new bespoke or new standard rules permission yourself or managing aspects of them.

If you are interested in taking part in either of these activities email

applypermissions@environment-agency.gov.uk

**The term permission is being used to cover licences, permits, permissions and registrations.*

As per our privacy notice [Environmental permits privacy notice](#), you do not need to take part in this user research.

Yours Jake Walker

Jake.walker@environment-agency.gov.uk

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Annex 1

How do I apply for a new permit?

To apply for a new permit, you must complete the relevant application forms and provide the required supporting information.

Bespoke permit:

- To apply for a bespoke installation permit you must complete application forms A, B2, B3 and F1.

You should read the guidance notes that accompany each form. You should download the application forms and open with an Adobe Acrobat Reader. You may not be able to complete the form using other pdf readers, such as the one built into your internet browser.

[Application forms and guidance for a bespoke permit application.](#)

You need to email the completed forms, along with supporting documentation, to psc@environment-agency.gov.uk

When sending documents please ensure they are named appropriately to clearly identify the contents. Please use the following format: Application [Application Type] [Document Title] DDMMYYYY

The document name cannot contain special characters apart from -_(). If additional text is required, it should go before the document date. For example:

- Application Bespoke Supporting Information Risk Assessment 14022024
- Application Bespoke Non-Tech Summary 14022024
- Application Standard Rules Site Plan 16022024

IMPORTANT: Do not reply to the email address you received this email from, it is not monitored. Please send any replies to preapplicationservice@environment-agency.gov.uk

How much will my permit cost?

In addition to the advice given in the general basic advice document this section is intended to give more activity specific advice which might help you to supply the correct fee for your application.

Baseline charge

Based on your proposal, your activity would consist of:

- Section 5.3 (a) (ii) – hazardous waste installation – physico-chemical treatment. (charging ref. 1.16.1.2) - **£16,001.00.**
- Section 5.6 – temporary or underground storage of hazardous waste. (charging ref. 1.16.4) - **£1,351.90 (10% of the relevant application charge).**

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- Physical treatment of non-hazardous waste. (charging ref. 1.16.12) - **£3,965.00 (50% of the relevant application charge).**

The fee will comprise the full application fee for the first activity and then 10% of the relevant application charge for the same activity carried out multiple times.

Where any of the activities above are carried out as a secondary activity to a higher fee paying activity (for example, a hazardous waste treatment activity), the application fee will comprise the full fee for the primary activity and 50% of the relevant application charge for any secondary activities that can reasonably be considered to be part of the same operation. Please see section 2.12 of the charging guidance [Environmental permits: when and how you are charged](#).

Where a Waste Operation activity (non-listed activity) is being carried out as Secondary activity to any of the non-hazardous waste treatment activities, the application fee will comprise the full fee for the primary activity and 50% of the relevant application charge for the Waste Operation activity.

Add-on charges

We have identified **fire** emissions as key issues for the sector. Depending on the findings of your risk assessment, it is possible that some or all of following add-on charges may be required in addition at the basic application fee:

- Emissions management plan (dust) – a fixed charge of **£1,241** (Our guidance does not state that an emissions management plan is mandatory for this proposal).
- Fire prevention plan - a fixed charge of **£1,241**.

Based on the information above, the estimated **total fee** would be **£22,558.90**. This is if an emissions management plan is not provided.

Supporting documents

You need to supply supporting documents with your application. The online guidance and application form guidance explain what documents you need to provide. Depending on the type of application, you might not be required to provide all the documents listed below.

If you do not provide the correct supporting information this may delay the processing your application.

We have assessed your proposal, and based on the following criteria, we would not require you to submit a **noise** impact assessment:

- Waste treatment activity
- External processes
- Over 75,000 tonnes of waste treated per annum
- No night time operations
- Nearest residential receptors are over 800m away

We would also not require an odour management plan, habitats assessment or pest management plan.

Non-Technical Summary

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For new bespoke permits you need to send us a simple explanation of your proposed activities. This should include a summary of your operations and a summary of the key technical standards and control measures arising from your risk assessment.

As a guide, this summary document should be no more than one to two pages in length.

Site plan

New installations applications require a site plan. It is also required when you propose to increase or reduce your site boundary.

The plan must clearly show the full site boundary in a single unbroken line. For standard rules permits, the boundary must be in green.

Your plan should clearly mark the site layout, infrastructure and drainage arrangements.

Environmental Management System

For new bespoke permit applications and transfer applications you must send a summary of your environmental management system (EMS). You should follow the [guidance on developing a management system](#).

Environmental Risk Assessment

For new applications or when you make changes, you must consider the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in [risk assessments for your environmental permit](#).

You should read our guide to [risk assessments for specific activities](#) and consider using our assessment tool to evaluate your environmental risk. Our assessment tool will inform you when more detailed modelling is required.

You should [check if your site is located in a flood risk zone](#). If the site is in a flood zone, you should assess the risk of pollution in the event of a flood.

Depending on the outcome of your initial environmental assessment, you may be required to undertake detailed modelling of your environmental risk.

Technical Description and BAT assessment

For new permit applications, you will need to provide a technical description of the activity.

You need to detail the plant, equipment and infrastructure, including design capacities. You must demonstrate how you will meet any relevant [Best Available Techniques](#) (including compliance with BAT conclusions where these have been published for your activity). This should include consideration for any relevant Directives, such as Medium Combustion Plant Directive (MCPD), Energy Efficiency Directive and Waste Framework Directive (WFD).

The technical assessment should also include details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment used (such as bunds) and how this meets any relevant standards. Please see the [pollution prevention guidance](#) for additional advice.

For Installation activities, you must demonstrate how you will meet any relevant Best Available Techniques (BAT) and emission limits set out in the [BREF for Waste Treatment](#), [BAT Conclusions](#)

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[for Waste Treatment](#) and the Environment Agency [Sector guidance notes S5.06 – recovery and disposal of hazardous and non-hazardous-waste](#).

For all waste activities, you must also provide an assessment to demonstrate how the site's infrastructure or equipment is designed to meet the requirements of the Waste Treatment BAT conclusions.

Fire prevention plan (FPP)

As you store combustible wastes at your site, you need to provide an FPP. You must follow our [guidance on Fire Prevention Plans](#). This tells you what to include in your FPP and the fire prevention measures you must put in place. We have also produced a template to help you prepare your plan.

If you are varying your permit and this will lead to an increased fire risk then a new or updated plan will be required.

The Environment Agency has produced a template for you to use to prepare your Fire Prevention Plan. This can be found following the link above. The template includes guidance on how to complete the plan. You do not have to use the template but we recommend that you do.

Accident prevention and management plan

Your EMS should include a plan for dealing with any incidents or events that could result in pollution. This should follow our [guidance on producing an accident prevention and management plan](#).

Technical Competence

If your activities include waste management, you must meet [legal operator and competence requirements](#). You will need to send in evidence of appropriate technical competence for the proposed activities. You will need to include valid certificates or other acceptable evidence.

Site condition report (SCR)

For guidance on site condition reports and establishing baseline reference data see [H5 Site Condition Report guidance](#).

If you are proposing to use, produce or release hazardous substances you may need to complete or update a stage 1 to 3 assessment in accordance with [EC Commission Guidance on baseline reporting \(2014/C 136/03\)](#) dated 6 May 2014.

To identify hazardous substances use the criteria given in article 3 in the [Classification, labelling and packaging of substances and mixtures regulations](#).

See sections below for further advice on SCR and stage 1 to 3 assessments for new bespoke applications.

New bespoke permit - SCR

You must submit a SCR with sections 1 to 3 of the SCR template completed with your permit application. You should use the [H5 Site Condition Report word template](#) to prepare your SCR.

You must complete a stage 1 to 3 assessment and include this in your SCR if you are proposing to use, produce or release hazardous substances.

- update your existing stage 1 to 3 assessment

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- produce a new stage 1 to 3 assessment if you do not already have one
- update or collect new baseline reference data, if applicable

This also applies if you are proposing to relocate any hazardous substances you currently use, produce or release to a new area within your site boundary.

You must submit this to us as part of your updated site condition report.

If your stage 1 to 3 assessment identifies a risk to soil and groundwater from relevant hazardous substances you **must** provide baseline reference data for these substances and include this information within your SCR.

You will be required to do periodic monitoring of soil and groundwater if your stage 1 to 3 assessment concludes there is a risk to soil and groundwater from relevant hazardous substances. It is recommended that you plan ahead for this and include details of your proposed monitoring plan in your site condition report.

It is recommended that A1 installations who do not have hazardous substances complete the stage 1 to 3 assessment for any other potentially polluting substances.

If your stage 1 to 3 assessment identifies a risk to soil and groundwater we recommend baseline reference data is established for these substances and you do soil and groundwater monitoring during the life of your permit.

This will help you demonstrate your site is in a satisfactory state when you apply to surrender all or part of your permit.

Supporting documents specific to non-hazardous and inert waste activities

In addition to those already mentioned in the general advice document you may also need to supply some specific supporting documents associated with the non-hazardous and Inert Waste activity with your application.

Waste types and EWC code list

Provide a description of the European Waste Catalogue (EWC) codes that will be received, stored and/or treated at the site. Where you are varying your permit and new waste types are proposed, you must carry out an assessment to determine whether any changes to control measures will be required and whether emissions will change - if so, you must submit a revised risk assessment and a proposal for appropriate emission control measures.

Waste pre-acceptance, acceptance and rejection procedures

Provide new or updated waste pre-acceptance, acceptance and rejection procedures that meet the requirements outlined in Section 3 of the [Non-hazardous and inert waste: appropriate measures for permitted facilities](#).

Waste storage and handling procedures

As part of the Operating Techniques, you must provide a technical description of the waste storage and handling procedures for the different waste types received at the site. The storage and handling procedures must be in line with the requirements outlined in Section 4 of the [Non-hazardous and](#)

[inert waste: appropriate measures for permitted facilities](#) and [Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities](#).

Other permissions required

The above advice covers installations activities only. Other permissions from the Environment Agency and/or other bodies may be required for your activity or if you carry out any associated or additional activities, for example:

- [List of activities that need an environmental permit](#)
- [If you abstract or impound water](#)
- [Planning permission](#)
- [If you work on or near a river, flood defence or sea defence](#)

Submitting an application

Please submit your application by email or, if applicable, by using the online form as detailed in the 'How do I apply for a new permit?' section above.

Send environmental permit application information in stages

You can ask the Environment Agency if you can submit application information in stages if your proposal is either or both:

- complex
- a novel technology

If you want to submit information in stages read the [guidance](#) and follow the instructions to request as part of enhanced pre-application advice.

After you apply

We will check your application to make sure it is complete. We refer to these checks as 'validation' and 'duly making'. This is to ensure we have enough information to start to determine your permit application. We will contact you if information is missing and can feasibly be provided within 10 working days. If we consider information cannot be provided within this time frame we will return your application with a list of what is missing.

If we cannot progress your application past this stage for any reason, we will return it and refund the application charge minus 20% to cover our costs to that point.

We will not charge this if we return an application after having done very little work – for example, because it contained obvious errors or omissions.

The amount we will keep is capped at £1,500.

Once we have duly made an application we will start to determine it. This is when we do our technical checks. We may need to ask you for further information or additional documents at this stage.

Once an application has been validated or duly made, it is ready to be allocated for determination.

The time it takes us to allocate an application varies, depending on the complexity of the specific application and the availability of a member of our team with the right skills to assess it.

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The amount of time taken to determine your application will vary. It will be impacted by factors such as:

- The quality of the application
- The complexity of the application
- Whether an application is of high public interest
- Whether the application includes novel technologies or techniques
- Whether the determination requires input from others, both internal and external to the Environment Agency
- Whether modelling and/or monitoring and assessment is required, for example Air Quality modelling and assessment

The Permitting Officer determining your application will be able to keep you updated with the progress of your application.

I still have questions about my application, and I'd like further advice

If you have remaining basic questions about your application which have not been answered by.gov.uk guidance pages or the advice given in this document (and any supplementary activity document) you can email us with your application specific question to: preapplicationservice@environment-agency.gov.uk

Please quote your unique Environment Agency EPR number found in your pre-app response email. Please note this basic free advice is limited to:

- The correct application charges
- The correct application forms to use
- What guidance you must follow
- Information about administrative tasks the Environment Agency may need you to do as part of your application
- If there are standard rules sets relevant to your activities and if you meet the criteria for them
- Information about risk assessments you may need to do to accompany your application

Alternatively, if you have decided that you now need chargeable enhanced pre-application advice to ask more detailed site-specific technical questions about your application then you will need to complete this [form](#) to access this service, insert your unique EPR number found in the basic pre-app response email when prompted by the form.

This enhanced service could include advice on:

- the type of permit you need
- complex modelling
- preparing risk assessments
- parallel tracking for complex permits with planning applications
- specific substances assessments
- monitoring requirements (including baseline)
- what guidance you must follow before you submit your application
- the correct application charge

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