

Clark, Wayne

From: Peter Thomas <peterc.thomas@virgin.net>
Sent: 17 July 2023 20:43
To: Irons, Sue
Subject: COPY_RE: Request for clarity by 19July: Your variation application (on behalf of Raymond Hillyer).
Ref: EPR/GB3607SL/V002 - EAWML 405661

Categories: To do

Hello Sue

Regarding the two queries that you raised in your e-mail below, I can confirm:

- 1) There is no document C4.3a. I added this as I thought I would need to submit something, however on reading the Appropriate Measures it wasn't necessary and I omitted to remove the reference, so apologies. Please find attached an amended form Part C4.
- 2) With regard to the wastes applied for, Ray would like to retain the codes that were on the SR2008 No19 permit. However, since permit issue in 2018 the only waste stream that has ever been accepted is 20 03 04. Therefore, please use the LOW contained in the original March 2022 application as the wastes that are allowable under the variation. If you require me to change the OMP and EMS summary please let me know & I can do that tomorrow (Tue 18th).

I'm in the office most of tomorrow. Therefore, if you need further information please don't hesitate to contact me.

Regards

Peter

Peter Thomas



4 Medina Way
Friars Cliff
Christchurch
Dorset
BH23 4EL
T/F 01425 240131
M 07977 997831 (primary contact)

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From: Irons, Sue <susan.irons@environment-agency.gov.uk>
Sent: Monday, July 17, 2023 5:30 PM
To: peterc.thomas@virgin.net
Subject: Request for clarity by 19July: Your variation application (on behalf of Raymond Hillyer). Ref: EPR/GB3607SL/V002 - EAWML 405661

Hello Peter,

I have completed looking at the Not Duly Made response; however, I wasn't able to locate C4.3a which was mentioned on Form Part C4 under 'Table 3a – Technical standards'. Please direct me to that document.

Could you also confirm which EWC code(s) are requested? I ask this as there is inconsistency between the Form Part C2: "is variation application seeks to regulise [sic] the conditions and retain the waste types and activities within the SR2008 No19", whereas the Odour Management Plan and EMS Summary indicate only single waste stream to be accepted - septic tank sludge EWC code 20 03 04.

Would you be able to provide clarity on both matters by close of 19 July please?

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

susan.irons@environment-agency.gov.uk

Work mobile :07867 328061

Ext. number: 02030252898

Int. number: 32898

Website: www.gov.uk/environment-agency

Waste - detailed information: <https://www.gov.uk/topic/environmental-management/waste>

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My flood incident role is: Incident Support Officer

From: Peter Thomas <peterc.thomas@virgin.net>
Sent: 13 July 2023 14:27
To: Irons, Sue <susan.irons@environment-agency.gov.uk>
Cc: PSC Land <PSC@environment-agency.gov.uk>
Subject: RE: Not Duly Made response due close 13/07/23: Your variation application (on behalf of Raymond Hillyer). Ref: EPR/GB3607SL/V002 - EAWML 405661

Dear Sue

Further to your e-mail below, I have now prepared and attach the following information in response to your request:

- C2.3d – EMS Summary
- C2.6 – Bioaerosol Risk Assessment
- Part C2 form, amended to include the two documents above.
- Part C4 form, amended to include the 'Biological waste treatment: appropriate measures for permitted facilities' guidance issued in September 2022.
- C4.3b – OMP Coombe Farm Lagoon
- Payment receipt for the additional £623.00.

I will inform EA Finance of the payment this afternoon.

I trust the above is now acceptable, however if you require further information or clarification, please do not hesitate to contact me.

Regards

Peter Thomas



4 Medina Way
Friars Cliff
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From: Irons, Sue <susan.iron@environment-agency.gov.uk>
Sent: Thursday, June 29, 2023 12:50 PM
To: peterc.thomas@virgin.net
Cc: PSC Land <PSC@environment-agency.gov.uk>
Subject: Not Duly Made response due close 13/07/23: Your variation application (on behalf of Raymond Hillyer).
Ref: EPR/GB3607SL/V002 - EAWML 405661

Dear Mr Peter Thomas

We need more information about your application and extra payment of application charge

Thank you for your application received in March 2022. The following is to confirm our conversation of 29/06/23.

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 C2:

- Question 3d – EMS summary

Please send us a summary of your management system with your application. It should follow our guidance [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) and include a brief summary under each of the topic headings:

[Site operations](#)

[Site and equipment maintenance plan](#)

[Contingency plans](#)

[Accident prevention and management plan](#)

[A changing climate](#)

[Complaints procedure](#)

[Managing staff competence and training records](#)

[Keeping records](#)

[Review your management system](#)

[Make sure people understand what you do](#)

- **Question 6 Environmental Risk Assessment (ERA)**

You need to include a **qualitative Bio-aerosol Risk Assessment**.

This must show that the process and/or abatement measures adequately prevent, or where this is not possible, significantly reduce the risk of bio-aerosols release. It must show that the resulting activity will be unlikely to expose the nearest sensitive receptor to elevated concentrations of bio-aerosols.

The detail and level of risk assessment must be site specific, process and location dependent. You must have measures and process controls in place to control and minimise the risks identified. These must be clearly stated in your assessment.

Reason for request: [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](http://www.gov.uk) - "If your site processes biowaste you must make sure that any people living or working near your site are not exposed to unacceptable levels of bioaerosols. The Environment Agency will not usually permit biowaste sites within 250 metres of places where people live or work", unless your risk assessment demonstrates that you are controlling emissions to an acceptable level."

Form Part C4:

- **Table 3a: Technical standards**

The relevant appropriate technical standards are no longer the S5.06 guidance.

Please amend Table 3a to include the current relevant technical standards: [Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

We would expect you to agree to the whole guidance or sections of it as appropriate. If you agree with all the parts you can simply state the guidance in Table 3a and say you agree with "all parts". If a particular section is not applicable you can state this ('Not applicable'). If you have an alternative measure to what is in the guidance please tell us about it by giving the reference to that document in the table's right hand column and submitting that document. In that document you must explain how the operator will deviate and justify why you consider it as good as or better than the measures in our 'Biological Waste' guidance.

- **Table 3b: General Requirements**

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>). I have attached a template document that you may choose to use; if you consider some sections are not relevant please indicate this and explain your reasoning.

Form Part F1:

Unfortunately the application payment you sent is incorrect. The correct application charge is £4,588 (relating to 1.16.6 Household, commercial and industrial waste transfer station, which includes lagoons. A Physical Treatment facility involves mainly mechanical treatment than passive screening). As you have already paid £3,965 this leaves a balance of **£623** to pay to Permitting Support Team (formerly known as P&SC).

Please send the information quoting the application reference to me and copy (cc) in psc@environment-agency.gov.uk. Or post to:

Permitting Support Team
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. In Determination we may ask for extra information, management plans and their fees.

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 or email me.

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