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Our Ref: BF5094/14-1.R0
Your Ref : EPR/FB3809KS/V004

Date: 27th February 2026

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

Via E-mail to: naomi.daniel01@environment-agency.gov.uk

Dear Naomi,

ENVIRONMENTAL PERMIT APPLICATION: TIPTON SWARF

Thank you for the Request for Information Notice of 13/02/2026 to support the application submitted to vary Environmental Permit EPR/FB3809KS to authorise the operation of a Secure Waste and Recycling Facility in Tipton.

Details of the additional information collected to address each request are provided below:-

Fee Payment

Please note that the remaining fee balance of £36,947.60 (Totalling £101,996) has been paid as of 19th February 2026 using payment reference PSCAPPINSTBIFFA080. A confirmation of the payment is included in **Document Ref. Payment advice - 19.02.26**.

Please also note that, as part of this response, Biffa is submitting a formal request for fee abatement. This details of this request are included within **Document Ref. 20260219_NS_0002_Tipton-SWaRF_Fee Abatement**.



[Demolition](#) | [Earthworks](#) | [Remediation](#) | [Drilling](#) | [Civils](#) | [Plant](#) | [Geotechnical](#) | [Environmental](#) | [Planning](#) | [Renewables](#)

VAT No: 827 4612 23
Company Registration No. 07057801

Missing Information

1) Form C2

a) Provide evidence of continuing competence

Response

An updated continuing competence certificate is included within this response. Please see **Document Ref. Ant COTC 2026**

b) Provide the National Grid References (NGR) for emission points A1- A4 and SW1

Response

The National Grid References for the relevant emission points have been included in Section 3.2 within **Document Ref. BF5094 05.R1 - Tipton SWaRF SS.**

c) Provide a stage 1-3 assessment for hazardous substances to accompany your Site Condition Report (SCR).

Response

The existing Site Condition Report (SCR) includes the relevant Stage 1-3 assessment for hazardous substances required under guidance concerning baseline reports in Article 22(2) of the Directive 2010/75/EU on industrial emissions. Please refer to Section 6.12 and 6.14 of the SCR.

d) Provide an air emissions risk assessment using the H1 assessment tool for the point source emissions to air A1, A2, A3 and A4.

Response

A1 (Vape Hammer Mill): The mill expels clean air from a filter system. Whilst the emissions will be monitored in accordance with BAT-AEL values for the treatment of WEEE containing VHCs (TVOC, 3-15mg/Nm³) according to EN 12619, this is an internal emission that does not vent directly to the atmosphere. As such, it is considered that this does not meet the criteria where an H1 assessment is required.

A2 (Nitrous Oxide Destruction Unit): As per our previous discussions, the Nitrous Oxide unit emits only Nitrogen and Oxygen which have no associated BAT-AEL. This is an internal emission that does not vent directly to the atmosphere. As such, it is considered that this does not meet the criteria where an H1 assessment is required.

A3 (Cigarette and Packaging Shredder): The dust extractor present emits clean air. Whilst this will be monitored according to the relevant BAT-AEL for channelled emissions to air for the mechanical treatment of waste (Dust, 2-5mg/Nm³) according to EN 13284-1., this is an internal emission that does not vent directly to the atmosphere. As such, it is considered that this does not meet the criteria where an H1 assessment is required.

A4 (Hazardous Alcohol Shredder): Clean air is emitted from the vapour scrubber associated with the alcohol shredder. Whilst this will be monitored according to the relevant BAT-AEL for channelled emissions to air from the treatment of water-based liquid waste (TVOC, 3-20mg/Nm³) according to EN 12619, this is an internal emission that does not vent directly to the atmosphere. As such, it is considered that this does

not meet the criteria where an H1 assessment is required.

Due to the fact that all emissions points vent internally, and not directly to the atmosphere, it is considered that a H1 assessment is not appropriate and therefore not required.

2) Form C3

- a) **Update and resubmit your EWC code tables to ensure that you clearly identify which EWC codes are being accepted into which activity.**

Response

Please see Appendix 3 of the revised Supporting Information Document (**Document Ref. BF5094/05.R1**) for an updated identification of waste codes and relevant activities.

- b) **Remove all non-hazardous waste codes from your section 5.3 hazardous waste activities, and ensure these are applied for under an appropriate activity.**

Response

All non-hazardous wastes have been moved to the Waste Operation EWC list. Please see Appendix 3 within **Document Ref. BF5094/05.R1** for an updated identification of waste codes and relevant activities.

- c) **Revise Appendix 3 of EWC code tables 1-7 to ensure all tables are included.**

Response

Please see Appendix 3 of the revised Supporting Information Document (**Document Ref. Document Ref BF5094/05.R1**) for an updated identification of waste codes and relevant activities.

- d) **Confirm total tonnages per day and per year to be received and processed in the non-hazardous waste operation**

Response

Please see Table 1 of the revised Supporting Information Document (**Document Ref. BF5094/05.R1**). The maximum daily tonnage of non-hazardous waste is 300 Tonnes, and the maximum annual tonnage is 78,300 Tonnes.

- e) **For each activity confirm the recovery/ disposal codes for the activities applied for.**

Response

Please see Table 1 of the revised Supporting Information Document (**Document Ref Document Ref BF5094/05.R1**).

- f) **Provide assessment against chemical, WEEE and non-hazardous waste appropriate measures.**

Response

The request for an assessment against chemical, WEEE and non-hazardous appropriate measures is not something we have been asked to submit as part of a permit application before. After reviewing the Environment Agency applications forms

C2 and C3, the submission of an assessment against the appropriate measures within the application is not required. Form C3 states that "if you are using the standards set out in the relevant technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a". As we have referenced the existing standards in form C3 Table 3 – Technical Standards, the application does not necessitate a justification of the appropriate measures.

Furthermore, as part of the Regulation 61 permit review process we are familiar with requests from permitting officers within the National Permitting Service that have required Biffa to confirm they will comply with the appropriate measures where applicable. This written confirmation has been accepted by the permitting officers without the submission of a separate assessment, and a number of permit variations have been issued with additional wording included within the permit conditions as part of the site's operating techniques under Table S1.2. An example of such wording has been provided below taken from the Introductory Note and the Operating Techniques table from another Biffa permit.

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1), to periodically review permits. As part of this variation, we have reviewed the permit and made the changes to necessarily reflect current standards and best practice, which principally relate to the implementation of our technical guidance 'Non-hazardous and inert waste: appropriate measures for permitted facilities' guidance. Also, confirmation of compliance with 'Chemical waste: appropriate measures for permitted facilities' guidance and 'Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities' guidance, as the site accepts hazardous and WEEE wastes.

The 'Non-hazardous and inert waste: appropriate measures for permitted facilities' guidance was published on the GOV.UK website on 12 July 2021 (updated on 8 December 2022 and 1 August 2023). This guidance sets out the standards that are relevant to regulated facilities with a permit to store, treat or transfer (or both) non-hazardous and inert wastes.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Version published 12 July 2021 Updated 1 August 2023		
Chemical waste: appropriate measures for permitted facilities. Version published 18 November 2020 Updated 18 November 2020	All relevant parts of the appropriate measure's guidance shall apply.	28/02/2025
Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities. Version published 13 July 2022 Updated 13 July 2022	All relevant parts of the appropriate measure's guidance shall apply.	28/02/2025
Additional information received in response to request for information dated 01/05/2025	Email dated 15/05/2025 details of wastes to be stored externally as per response	15/05/2025

Table S1.2 Operating techniques		
Description	Parts	Date Received
Odour Management Plan 04/04/2019	Odour management plan reference BF4993/07 In response to section 3a, Table 3b – General Requirements, Part C4 of the application form.	04/04/2019
Dust Management Plan 04/04/2019	Dust Emissions management Plan Ref BF4993/09 - March 2019	04/04/2019
Fire Prevention Plan 28/05/2019	Approved Fire Prevention Plan consisting of the following documents: <ul style="list-style-type: none"> • Fire Prevention Plan: BF4993/06 (Rev 1) May 2019 • Indicative Operational Layout Plan Ref BF4993/08/03 (Rev 2) • Fire Prevention and Safety Document – February 2016 	28/05/2019
Non-hazardous and inert waste: appropriate measures for permitted facilities.	All relevant parts of the appropriate measure's guidance shall apply.	04/10/2024

As the above approach forms part of an Environment Agency led permit review process then we hope this consistent approach is acceptable for this application. If further information is still required then we would kindly suggest that this is dealt with during the permit determination stages of the application, however for the reasons set out above we hope this not to be the case.

- g) Confirm the EWC codes for WEEE you consider suitable for destruction in the 5.3 activity applied for, and EWC codes for WEEE you will only take for storage and transfer off site under the section 5.6 activity.**

Response

The EWC codes for hazardous WEEE suitable for destruction are included in Appendix 3 Table 3, whilst the non-hazardous WEEE (Treated separately) is included in Table 1. Hazardous WEEE taken for storage and transfer is included in Table 2.

- h) Confirm the waste operations you wish to carry out under this application.**

Response

As above, all non-hazardous wastes appended to hazardous activities within the EWC list have been moved to the waste operation. As noted in the supporting statement, a maximum of 10 Tonnes of WEEE will be treated daily. As such, it is considered that an additional activity is not required, as this is below the 75t/d installation activity threshold.

I trust that these responses satisfy your information requirements and will enable the application to be duly made and progress for determination.

I trust that the responses provided in this covering document and the attached satisfies your requests for information.

Yours sincerely

William Rees

William Rees
Graduate Environmental Consultant
For and on behalf of Sirius Environmental Ltd

Enc.

20260219_NS_0002_Tipton-SWaRF_Fee Abatement.pdf

Payment advice - 19.02.26.pdf

Ant COTC 2026.pdf

Supporting Documents

BF5094 05 R1 - Tipton SWaRF SS