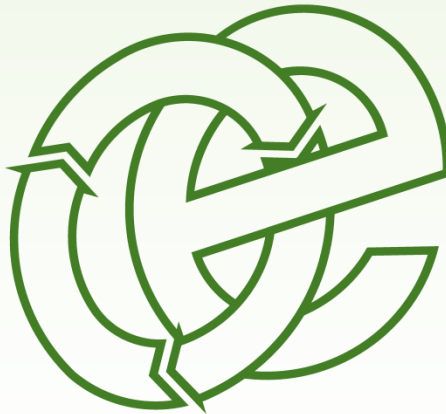


NON-TECHNICAL SUMMARY

The Foundry, Siding Road, Fleetwood, FY7 6NS

Foulds Metals Ltd

Version:	1.3	Date:	18 November 2024		
Doc. Ref:	2585-003-C	Author(s):	IA	Checked:	FML
Client No:	2585	Job No:	003		



Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants



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1.0	04/10/2023	IA	--	Internal draft
1.1	04/01/2023	IA	--	Second draft
1.2	08/07/2024	IA	--	Application copy
1.3	18/11/2024	IA	--	EA comments

CONTENTS

DOCUMENT HISTORY: I

CONTENTS II

1 INTRODUCTION 1

 1.1 GENERAL 1

 1.2 FIRE PREVENTION PLAN 1

 1.3 NOISE AND DUST..... 1

2 APPLICATION PROPOSALS 2

3 EWC CODES 5

4 DOCUMENTATION AND FEES..... 7

1 Introduction

1.1 General

1.1.1 This Non-Technical Summary (NTS) accompanies a variation application to a bespoke permit on behalf of Foulds Metals Ltd (the operator). The site is situated at The Foundry, Siding Road, Fleetwood, FY7 6NS.

- The site will operate as a metal recycling site to accept, store and treat mixed metals, WEEE and ELV's.

1.2 Fire Prevention Plan

1.2.1 The site will include hazardous and non-hazardous WEEE & cable storage and the manual processing and dismantling of cables and degassed refrigerants which will be covered in an FPP.

1.2.2 Enhanced Pre-application discussions have confirmed that an FPP is not required on submission of the application, the following was stated *'If you are not increasing fire risk by increasing storage tonnage or extending the site boundary, we would not need to undertake an assessment of the FPP at permit application' and 'Area will review any changes as part of compliance after the variation'*

1.3 Noise and Dust

1.3.1 Given that the operator is not increasing the throughput or changing the onsite treatment activities, it has been considered that Noise and Dust assessments are not required as part of the application as there will no increased dust generation (*onsite activities not considered to be dust generating*) and the noise profile of the site will not change. Enhanced Pre-application advice confirmed the following:

- *'Based on the information provided a Noise Impact Assessment (and associated Noise Management Plan) and Dust Management Plan are not required to be submitted as part of the application for assessment'.*

2 Application proposals

2.1 Foulds Metals Ltd will hold and operate an Environmental Permit (EP) for the following activities:

- Metal recycling site – vehicle dismantling (referenced as 1.16.15 of the EPR charging tables).
- Metal recycling site – mixed metals (referenced as 1.16.16 of the EPR charging tables).

2.2 Whilst the permit currently allows a lot of the operations specified below, the permit variation will seek to allow for the following:

- Acceptance, storage and treatment of Hazardous and Non-hazardous WEEE (including de-gassed refrigerants and cables)
- Acceptance, storage and treatment of Mixed metals (ferrous and non-ferrous)
- Acceptance, storage and depollution of ELV's
- EWC codes listed in Table 3.1 below.

2.2.1 The annual throughput of the site will remain the same as already permitted i.e. <25,000 tonnes per annum for Mixed Metal Recycling and WEEE and <5,000 tonnes per annum for ELVs. The total throughput is therefore 30,000 tonnes in total for the entire site, however of the 30,000 tonnes, 3,000 tonnes will allow for the 10 tonnes daily acceptance of hazardous wastes i.e. cables, batteries, ELVs, WEEE etc.

2.2.2 The proposed storage quantities of the site will be governed by the EMS and FPP and not as part of the EP conditions.

Cable procedure

2.2.3 Unprocessed cables will be accepted at the site and tipped into the external storage area which benefits from an impermeable concrete surface.

- 2.2.4 Cables will be broken down into sizable lengths and placed into storage bins. The cables will be transferred into the onsite waste buildings where they are processed and stripped into separate fractions.
- 2.2.5 The non-ferrous elements will be transferred to the non-ferrous storage area in the adjacent building. The remaining hazardous elements i.e. grease papers etc.. will be transferred to IBCs which are stored in the northern yard on an impermeable concrete surface and undercover to prevent the ingress of rainwater.
- 2.2.6 As part of the enhanced pre-application service, The Environment Agency have determined the following: *‘the cable stripping activity is not a physico-chemical treatment of waste. Therefore, even if your operation processes more than 10 tonnes of hazardous cable per day, it does not constitute a Schedule 1 installation activity. Consequently, the storage of hazardous cable pending that activity does not qualify as an installation activity either, even if it exceeds 50 tonnes per day, given that the cable is stored for manual dismantling’.*

Refrigerants procedure

- 2.2.7 The site will accept small coolers from fridges which they accept from a brewery company, typically these are only accepted if the company they are receiving them from can't repair them beforehand.
- 2.2.8 The company will degas the units prior to the operator (i.e. Foulds Metals) receiving them. Foulds Metals Ltd will dismantle the units by hand and equipment (if required) within a building and remove several components such as:
- stainless steel coil and copper coil
 - electric motor
 - compressor
 - cooling rad
 - outer steel casing
 - copper flex cable

- 2.2.9 They will not contain any blown foam insulation containing CFCs or flammable gas as all of this is removed prior to being accepted at the site as previously detailed.
- 2.2.10 Resultant metals will be transferred to the relevant storage area on site i.e. non-ferrous or ferrous stockpiles. The remaining elements i.e. plastics etc. will be taken to the general waste skip where they are temporarily stored prior to removal off site to a permitted facility.
- 2.2.11 Pre-application advice was undertaken which confirmed that this activity falls under Section 1.16.6.
- 2.2.12 The following R & D codes will be applicable to the activity:
- **D15:** Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced)
 - **R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)
 - **D9:** Physico-chemical treatment not specified elsewhere in Annex IIA which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D8 and D10 to D12
 - **R3:** Recycling/reclamation of organic substances which are not used as solvents.
 - **R4:** Recycling/reclamation of metals and metal compounds
 - **R5:** Recycling/reclamation of other inorganic materials

3 EWC Codes

3.1 It is worth noting that the majority of the codes listed in the table below will be retained from the operators existing permit. Codes highlighted in green are proposed codes. The full list of EWC codes for the site are detailed below:

Table 3.1 – ELV, WEEE & Metal Recycling EWC Codes

Waste Code	Description
02	WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 10	Waste metal
12	WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics
12 01 01	ferrous metal filings and turnings
12 01 03	non-ferrous metal filings and turnings
15	WASTE PACKAGING
15 01	packaging (including separately collected municipal packaging waste)
15 01 04	metallic packaging
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 01	end-of-life vehicles from different means of transport [including off-road machinery] and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13,14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 04*	end-of-life vehicles
16 01 06	end-of-life vehicles (containing neither liquids nor other hazardous components)
16 01 17	ferrous metal
16 01 18	non-ferrous metal
16 01 21*	hazardous vehicle components – catalytic converters containing RCF matting
16 01 22	catalytic converters not containing RCF matting
16 01 22	discarded components not otherwise specified
16 02	wastes from electrical and electronic equipment
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
16 02 15*	hazardous components removed from discarded equipment
16 02 16	components removed from discarded equipment other than those mentioned in 16 02 15
16 06	Batteries and accumulators
16 06 01*	lead batteries
16 06 05	other batteries and accumulators
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)

Waste Code	Description
17 04 01	copper, bronze, brass
17 04 02	aluminium
17 04 03	lead
17 04 04	zinc
17 04 05	iron and steel
17 04 06	tin
17 04 07	mixed metals
17 04 10*	cables containing oil, coal tar and other hazardous substances
17 04 11	cables other than those mentioned in 17 04 10
19	WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE
19 01	wastes from incineration or pyrolysis if waste
19 01 02	ferrous metals removed from bottom ash
19 10	wastes from incineration or pyrolysis if waste
19 10 01	iron and steel waste
19 10 02	non-ferrous metal
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 02	ferrous metal
19 12 03	non-ferrous metal
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
20 01 33*	lead batteries
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components
20 01 40	Metals

4 Documentation and fees

4.1 The have confirmed that the following fees are applicable for the application.

Table 4.1 – Base Application Fee Table

Charging Scheme Ref	Charging Scheme Ref & Description	Type of application (Ref)	Fee
1.16.15	Metal recycling site – vehicle dismantling	Substantial Variation	£7,956
1.16.16	Metal recycling site – mixed metals	Substantial Variation	£8,517
1.19.2	Habitats Assessment Fee	N/A	£779
		TOTAL	£17,252

Appendix I

Enhanced pre-application advice & correspondence

Mr Isaac Allen
Ian J Barnes - Foulds Metals
The Foundry,
Sidings Road,
Fleetwood,
FY7 6NS

Our reference: EPR/YP3091CA/P002
Date: 21/05/2024

Dear Isaac Allen

Pre application advice – Enhanced service

Site: Ian J Barnes - Foulds Metals, The Foundry, Sidings Road, Fleetwood, FY7 6NS

Thank you for your pre application enquiry on 22/02/2024

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:

- Emails on 07/03/2024, 08/04/2024 and 29/04/2024
- Telephone conversation on 01/05/2024

The Environment Agency have determined that the cable stripping activity is not a physico-chemical treatment of waste. Therefore, even if your operation processes more than 10 tonnes of hazardous cable per day, it does not constitute a Scheule 1 installation activity. Consequently, the storage of hazardous cable pending that activity does not qualify as an installation activity either, even if it exceeds 50 tonnes per day, given that the cable is stored for manual dismantling.

Based on this understanding, it appears likely that your site can continue to be permitted as a waste operation. However, it's important to ensure that other hazardous waste stored pending physico-chemical treatment, such as batteries, do not exceed 50 tonnes at any one time. We will need to include a condition in your permit to cover this requirement.

There were additional hazardous waste codes included in the application that we understand will be removed. In the event that they are not removed, you will need to provide details on how these wastes will be treated on site what quantity will be stored/treated. This waste treatment and storage could still have an impact on whether your operation is an installation or a waste operation.

The operation will be both a metal recycling site (MRS) (for the mixed metal and WEEE) under 1.16.16 and an ELV treatment facility (vehicle dismantler) under 1.16.15. As this is a variation to a bespoke waste operation there is no discount to the application fee which will be a substantial variation fee for both these two activities.

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 1 of 5

The total application fee £7, 956 (1.16.15) + £8, 517 (1.16.16) = **£16,473**

Regarding the yearly subsistence fee if the overall tonnage is staying at 75,000 or less for each individual activity then this would potentially fall under a single fee under 2.16.20, **£2,567 per year.**

You can accept up to 75,000 tonnes per annum under either the metal recycling (which includes the WEEE/Batteries) or ELV activities.

If the annual tonnage for either of the activities is above this then the subsistence would be under 2.16.19, **£4,006 per year.**

If the changes to the site activities result in an increased environmental risk or scale of operations, then the FPP will need to be reassessed. A revised Noise Impact Assessment (and associated Noise Management Plan) may be required if there is a change to the noise profile on site. An updated/new Dust Management Plan will be required if there is an increase in risk of dust dependant on the site location and receptors. There may also be habitats charge if within the screening distance.

Useful links:

- [Read the fire prevention plan guidance](#)
- [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](#)
- [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](#)
- [Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](#)
- [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](#)

Application Forms for a waste variation application:

Complete [part A: about you](#), [part C2: varying a bespoke permit](#), and [part C4](#) to change a bespoke waste operation permit, along with [part F1: charges and declarations](#).

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

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

Application reference number	EPR/YP3091CA/P002
Application charge required	£16,473
Forms required to be submitted	Part A, part C2, part C4, part F1

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

customer service line 03706 506 506

floodline 03459 88 11 88

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Page 2 of 5

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	<p>Site plan must be clearly marked with the full site boundary.</p> <p>For water discharge activity permits your site plan must also show:</p> <ul style="list-style-type: none"> • the sewage treatment plant • the sample point • the point where the sewage is discharged to the receiving surface water
Payment	Please note your application will not be processed until we receive the full payment.

Exemptions

Waste exemptions allow low-risk waste management operations to be carried out without an environmental permit. Waste exemptions are intended to be operated as discrete activities and the rules around exemptions will be changing in future.

Although there have been no changes to the law yet, future waste exemptions reforms will mean exemptions cannot be registered at or adjacent to (where there is a direct link) permitted waste operations. Waste exemptions cannot currently be used on a permitted installation. For further details please read [Waste Exemptions – Getting Ready for Change](#).

You may wish to consider the waste exemption reforms before submitting permit applications or variations and incorporate those waste exemptions into your application.

You can also deregister some or all of your exemptions using our [waste exemptions digital service](#).

Once your application has been allocated to a permitting officer, please ask if you have questions about how exemptions you already have registered or are proposing to register may affect your permitted site.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: **EPR/YP3091CA/P002**

If the advice above details using the [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 3 of 5

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue,
Sheffield, S9 4WF

Application Timescales

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

Once an application is duly made, 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.

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 only.

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 £800 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

Page 4 of 5

We consider this pre application request is now closed however if you have any questions regarding this letter please contact Thomas Proudfoot, thomas.proudfoot@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 - GOV.UK \(www.gov.uk\)](#), you do not need to take part in this user research.

Yours sincerely

Thomas Proudfoot

thomas.proudfoot@environment-agency.gov.uk

From: [Proudfoot, Thomas](#)
To: [Isaac Allen](#)
Subject: RE: Enhanced Pre-Application Advice - EPR/YP3091CA/P002 CRM:0823028
Date: 24 May 2024 16:15:19
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image008.png](#)
[image010.png](#)
[Foulds Metals - EPR-YP3091CA-P002 - Enhanced pre application advice letter V1 24.05.2024.docx](#)

Good afternoon Isaac,

If you are not increasing fire risk by increasing storage tonnage or extending the site boundary, we would not need to undertake an assessment of the FPP at permit application.

However, you may need to update it to reflect any change in the storage layout of the wastes shown within the plan as the hazardous waste is not covered by the FPP but still needs to be stored so that it is stored taking the FPP guidance into consideration in terms of separation distances. Area will review any changes as part of compliance after the variation.

Based on the information provided a Noise Impact Assessment (and associated Noise Management Plan) and Dust Management Plan are not required to be submitted as part of the application for assessment.

I have attached an updated version of the advice letter due to an editing oversight in the template. The advice remains the same, with additional details provided in this email.

I won't be able to comment any further and the pre-application process is now closed.

Kind regards,
Thomas

From: Isaac Allen <Isaac@oaktree-environmental.co.uk>
Sent: Friday, May 24, 2024 11:16 AM
To: Proudfoot, Thomas <Thomas.Proudfoot@environment-agency.gov.uk>
Subject: RE: Enhanced Pre-Application Advice - EPR/YP3091CA/P002 CRM:0823028

Good afternoon Thomas,

Thanks for sending this pre-application advice over, in the original pre-application request we were also seeking confirmation of the required assessments/management plans. The response provided doesn't provide confirmation of which are required as part of the application, instead, it just states the following:

If the changes to the site activities result in an increased environmental risk or scale of operations, then the FPP will need to be reassessed. A revised Noise Impact Assessment (and associated Noise Management Plan) may be required if there is a change to the noise profile on site. An updated/new Dust Management Plan will be required if there is an increase in risk of dust dependant on the site location and receptors.

Given that the operator is not increasing the throughput or changing the onsite treatment activities, we would consider that Noise and Dust assessments are not required as part of the application as there will no increased dust generation and the noise profile of the site will not change. Obviously, we

understand that there is a new combustible waste stream i.e. the hazardous cables, however the site is already permitted to accept non-hazardous cables and therefore the proposed wastes are of a similar nature to existing waste streams, based on this we would consider that there is no increased environmental risk and therefore no requirement for an FPP to be submitted. Please could you confirm that our understanding is correct?

Thanks.

Kind Regards

Isaac

Isaac Allen Bsc
Senior Consultant

01606 558833 | 07771 360151

Isaac@oaktree-environmental.co.uk

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From: SM-Defra-RESP-noreply (DEFRA) <RESP-noreply@defra.gov.uk>

Sent: Tuesday, May 21, 2024 11:51 AM

To: Isaac Allen <Isaac@oaktree-environmental.co.uk>

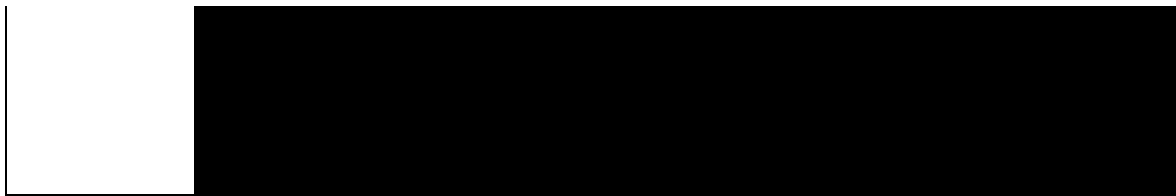
Cc: Proudfoot, Thomas <Thomas.Proudfoot@environment-agency.gov.uk>

Subject: Enhanced Pre-Application Advice - EPR/YP3091CA/P002 CRM:0823028

Dear Isaac Allen,

Please find attached enhanced pre-application advice letter for an environmental permit application.

Yours sincerely,
Pre-Application Team



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