NON-TECHNICAL SUMMARY

Unit 18, Thorn Business Park, Rotherwas Industrial Estate, Rotherwas, Hereford, HR2 6JT

Chapel Road Enterprise Ltd

Version:	1.1	Date:	23 June 2	025	
Doc. Ref:	TBP-3361-C	Author(s):	EG	Checked:	СР
Client No:	3361	Job No:	008		



Oaktree Environmental Ltd

Waste, Planning & Environmental Consultants



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Document History:

Version	Issue date	Author	Checked	Description
1.0	21/02/2025	EG	CP	Application copy
1.1	23/06/2025	EG	СР	Update to list of EWC codes

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1 Introduction

1.1 General

- 1.1.1 Oaktree Environmental Ltd have been instructed to prepare this Non-Technical Summary (NTS) on behalf of Chapel Road Enterprise Ltd (the Operator) to support a permit variation application for Environmental Permit Ref. EPR/TP3595FH (the Permit).
- 1.1.2 The Permit authorises a household, commercial & industrial waste transfer station with treatment facility situated at Unit 18, Thorn Business Park, Rotherwas Industrial Estate, Rotherwas, Hereford, HR2 6JT.
- 1.1.3 The Operator is seeking to vary the Permit to authorise the external storage and treatment of non-specified wastes and include shredding as a treatment activity, further details are provided in Section 2.1 overleaf.
- 1.1.4 Enhanced pre-application advice was obtained from the Environment Agency prior to preparation of this variation application. A copy of the advice received is included in Appendix I.

1.2 Permit Status Log

Table 1.1 - Permit Status Log

Status log of the permit			
Description	Date	Comments	
Permit Determined	15/10/2002	Permit for a Household,	
EAWML 30271		Commercial & Industrial Waste	
		Transfer Station issued to Joseph	
		Henry Lively	
Variation to EAWML30271 determined	19/01/2005	Varied permit issued	
Variation determined	06/04/2010	Administrative variation to add 2	
EPR/TP3595FH/V003		waste codes to the list of	
		permitted waste types accepted at the facility	
Variation determined	24/06/2014	Varied permit issued	
EPR/TP3595FH/V004			
Variation determined	13/08/2014	Variation to correct waste codes	
EPR/TP3595FH/V005		on issued permit	
Variation determined	18/12/2023	Application for admin variation	
EPR/TP3595FH/V006		returned	
Transfer determined	13/05/2024	Full permit transfer to Chapel	
EPR/TP3595FH/V007		Road Enterprise Ltd	

2 Application Proposals

2.1 <u>Variation Proposals</u>

- 2.1.1 The operator is seeking to vary the permit with the following:
 - a) Update the permit to a modern format.
 - b) Authorise the external storage and treatment of non-specified waste.
 - c) Include shredding as a waste treatment operation. Only wood and green waste will be shredded under this treatment operation.
- 2.1.2 It is proposed the following activities will be undertaken on site for the HCI operations:
 - a) Sorting (with loading shovel/360° excavator or by hand).
 - b) Manual separation (by picking line).
 - c) Storage (prior to removal).
- 2.1.3 It is proposed the following activities will be undertaken on site for the physical treatment operations:
 - a) Screening (by using appropriate mechanical screening plant and equipment).
 - b) Shredding (by using appropriate mechanical plant).
 - c) Mechanical separation (including magnets and blowers).
- 2.1.4 With the exception of the shredding of wood and the secondary screening of aggregates all other waste will continue to be treated within a building.
- 2.1.5 All wastes will be stored and treated on an impermeable surface with sealed drainage, wastes will be stored in accordance with the locations and quantities illustrated on Drawing No. TBP/3361/03.
- 2.1.6 There are no proposed changes to the throughput of waste at the site, the combined throughput for the physical treatment activity and hazardous waste transfer station will be 75,000 tonnes per annum. It is not considered possible to specify a throughput

for each activity due each activity being directly connected to one another i.e. all waste accepted under the waste transfer station will undergo treatment.

2.1.7 There are no proposed changes to the permit boundary.

2.2 Proposed EWC Codes

2.2.1 The following EWC codes in Table 2.1 are proposed to be included in the permit for the HCI waste transfer station with treatment operation.

Table 2.1 - Proposed EWC codes - hazardous waste transfer station

		T
Waste	Description	Treatment activity
Code		
01	WASTES RESULTING FROM EXPLORATION,	
	MINING, QUARRYING, AND PHYSICAL AND	
	CHEMICAL TREATMENT OF MINERALS	
01 04	wastes from physical and chemical processing of	
	non-metalliferous minerals	
01 04 08	waste gravel and crushed rocks other than those	Sorting (with loading shovel 360°
	mentioned in 01 04 07	excavator or by hand)
01 04 09	waste sand and clays	Manual separation (via picking line)
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 03	plant-tissue waste	Sorting (with loading shovel 2609
02 01 04	waste plastics (except packaging)	Sorting (with loading shovel 360° excavator or by hand)
02 01 07	wastes from forestry	Manual separation (via picking line)
02 01 10	waste metal	Wandar separation (via picking line)
03	WASTES FROM WOOD PROCESSING AND	
	THE PRODUCTION OF PANELS AND	
	FURNITURE PULP, PAPER, AND	
	CARDBOARD	
03 01	wastes from wood processing and the	
	production of panels and furniture	
03 01 01	waste bark and cork	Sorting (with loading shovel 360°
03 01 05	sawdust, shavings, cuttings, wood, particle board	excavator or by hand)
	and veneer other than those mentioned in 03 01	Manual separation (via picking line)
	04	Manadi Separation (Via pieking inie)
03 03	wastes from pulp, paper and cardboard	
	production and processing	
03 03 01	waste bark and wood	
03 03 07	mechanically separated rejects from pulping of	Sorting (with loading shovel 360°
	waste paper and cardboard	excavator or by hand)
03 03 08	wastes from sorting of paper and cardboard	Manual separation (via picking line)
	destined for recycling	

04	WASTES FROM THE LEATHER, FUR AND	
	TEXTILE INDUSTRIES	
04 02	wastes from the textile industry	0 1 / 11 1 1 1 1 1 1 1 1
04 02 21	wastes from unprocessed textile fibres	Sorting (with loading shovel 360°
04 02 22	wastes from processed textile fibres	excavator or by hand) Manual separation (via picking line)
07	WASTES FROM ORGANIC CHEMICAL PROCESSES	
07 02	wastes from the MFSU of plastics, synthetic	
	rubber and man-made fibres	
07 02 13	waste plastic	Sorting (with loading shovel 360° excavator or by hand) Manual separation (via picking line)
10	WASTES FROM THERMAL PROCESSES	
10 01	Wastes from power stations and other combustion plants (except 19)	
10 01 01	bottom ash, slag and boiler dust (excluding	Sarting /with loading should 2609
	boiler dust mentioned in 10 01 04)	Sorting (with loading shovel 360° excavator or by hand)
10 01 02	coal fly ash	· ·
10 01 03	fly ash from peat and untreated wood	Manual separation (via picking line)
10 02	wastes from the iron and steel industry	
10 02 01	wastes from the processing of slag	Sorting (with loading shovel 360°
10 02 02	unprocessed slag	excavator or by hand)
10 02 10	mill scales	Manual separation (via picking line)
10 11	wastes from the manufacture of glass and glass products	
10 11 03	waste glass-based fibrous material	
10 11 10	waste preparation mixture before thermal	Santina / with landina shawal 2000
	processing, other than those mentioned in 10 11 09	Sorting (with loading shovel 360° excavator or by hand)
10 11 12	waste glass other than those mentioned in 10 11 11	Manual separation (via picking line)
10 12	wastes from the manufacture of ceramic goods, bricks, tiles, and construction products	
10 12 01	waste preparation mixture before thermal	
	processing	
10 12 06	discarded moulds	Sorting (with loading shovel 360°
10 12 08	waste ceramics, bricks, tiles, and construction products (after thermal processing)	excavator or by hand) Manual separation (via picking line)
10 12 12	wastes from glazing other than those mentioned	
	in 10 12 11	
15	WASTE PACKAGING: ABSORBENTS, WIPING	
	CLOTHS, FILTER MATERIALS AND	
	PROTECTIVE CLOTHING NOT OTHERWISE	
	SPECIFIED	
15 01	packaging (including separately collected municipal packaging waste)	
15 01 01	paper and cardboard packaging	
15 01 02	plastic packaging	1
15 01 03	wooden packaging	1
15 01 04	metallic packaging	Sorting (with loading shovel 360°
15 01 05	composite packaging	excavator or by hand)
15 01 06	mixed packaging	Manual separation (via picking line)
15 01 07	glass packaging]
15 01 09	textile packaging	<u>]</u>

15 02	absorbents, filter materials, wiping cloths and	
13 02	protective clothing	
15 02 03	absorbents, filter materials, wiping cloths,	Sorting (with loading shovel 360°
	protective clothing other than those mentioned	excavator or by hand)
	in 15 02 02	Manual separation (via picking line)
16	OTHER WASTES FROM INDUSTRIAL PROCESSES	
16 06	Batteries	
16 06 01*	lead acid batteries	Sorting (with loading shovel 360°
16 06 02*	ni-cd batteries	excavator or by hand)
16 06 03*	Mercury-containing batteries	Manual separation (via picking line)
17	CONSTRUCTION AND DEMOLITION	
	WASTES (INCLUDING EXCAVATED SOIL	
	FROM CONTAMINATED SITES)	
17 01	concrete, bricks, tiles, and ceramics	
17 01 01	concrete	
17 01 02	bricks	Sorting (with loading shovel 360°
17 01 03	tiles and ceramics	excavator or by hand)
17 01 07	mixture of concrete, bricks, tiles, and ceramics	Manual separation (via picking line)
	other than those mentioned in 17 01 06	
17 02	wood, glass and plastic	
17 02 01	wood	Sorting (with loading shovel 360°
17 02 02	glass	excavator or by hand)
17 02 03	plastic	Manual separation (via picking line)
17 03	bituminous mixtures, coal tar and tarred products	
17 03 02	Road base and road planings (other than those	Sorting (with loading shovel 360°
	containing coal tar) only	excavator or by hand)
		Manual separation (via picking line)
17 04	metals (including their alloys)	
17 04 01	copper, bronze, brass	
17 04 02	aluminium	-
17 04 03	lead	-
17 04 04	zinc	Sorting (with loading shovel 360°
17 04 05	iron and steel	excavator or by hand)
17 04 06	tin mixed metals	Manual separation (via picking line)
17 04 07 17 04 10*	cables containing hazardous substances other	1
17 04 10	than oil or coal tar	
17 04 11	cables other than those mentioned in 17 04 10	1
17 05	soil (including excavated soil from	
	contaminated sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in	
	17 05 03	Carting (with I - dir - dr - 1200
17 05 06	Dredging soil other than those mentioned in 15	Sorting (with loading shovel 360°
	05 05	excavator or by hand) Manual separation (via picking line)
17 05 08	track ballast other than those mentioned in 17	ivianuai separation (via picking iine)
	05 07	
17 06	Insultation materials and asbestos-containing	
	construction materials	
17 06 01*	Insulation materials containing asbestos	Sorting (with loading shovel 360°
17 06 04	Insultation materials other than those	excavator or by hand)
47.00.05*	mentioned in 17 06 01 and 17 06 03	Manual separation (via picking line)
17 06 05*	Construction materials containing asbestos ⁴	
17 08	gypsum-based construction materials	

	gypsum-based construction materials other	Sorting (with loading shovel 360°
17 08 02	than those mentioned in 17 08 01	excavator or by hand)
		Manual separation (via picking line)
17 09	other construction and demolition wastes	
	mixed construction and demolition waste other	Sorting (with loading shovel 360°
17 09 04	than those mentioned in 17 09 01, 17 09 02	excavator or by hand)
	and 17 09 03	Manual separation (via picking line)
17 09 04	mixtures of soil, bricks, stones and concrete	Wandar separation (via picking line)
19	WASTES FROM WASTE MANAGEMENT	
	FACILITIES, OFF-SITE WASTEWATER	
	TREATMENT PLANTS AND THE	
	PREPARATION OF WATER INTENDED FOR	
	HUMAN CONSUMPTION AND WATER	
	FOR INDUSTRIAL USE	
19 08	Wastes from wastewater treatment plants not	
	otherwise specified	
19 08 01	screenings	Sorting (with loading shovel 360°
19 08 02	waste from desanding	excavator or by hand)
		Manual separation (via picking line)
19 12	wastes from the mechanical treatment of	, , , , , , , , ,
	waste (for example sorting, crushing,	
	compacting, pelletising) not otherwise	
	specified	
19 12 01	paper and cardboard	
19 12 02	ferrous metal	1
19 12 03	non-ferrous metal	1
19 12 04	plastic and rubber	1
19 12 05	glass	
19 12 07	wood other than that mentioned in 19 12 06	1
19 12 08	textiles	1
19 12 09	minerals (for example sands, stones)	1
19 12 10	combustible waste (refuse derived fuel)	
19 12 12	other wastes (including mixtures of materials	Sorting (with loading shovel 360°
	comprising non-hazardous residual waste from	excavator or by hand)
	waste management facilities mechanically	Manual separation (via picking line)
	treating EWC chapters 15, 17 and 20 coded	ivialidal separation (via picking line)
	non-hazardous household, commercial,	
	industrial or municipal waste other than those	
	mentioned in 19 12 11)	
19 12 12	Other wastes (residual waste not containing	
	hazardous substances from waste	
	management facilities mechanically treating	
	17 01 01, 17 01 02, 17 01 03, 17 01 07, 17 05	
	04, 17 09 04, 20 02 02 only and other than	
	those mentioned in 19 12 11).	
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 01	paper and cardboard	6 .: / ::
20 01 02	glass	Sorting (with loading shovel 360°
20 01 10	clothes	excavator or by hand)
20 01 11	textiles	Manual separation (via picking line)

20 01 21*	fluorescent tubes and other mercury- containing waste	
20 01 33*	batteries included in 16 06 01, 16 06 02, or 16 06 03 and unsorted batteries	
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, 20 01 23 and 20 01 35	
20 01 38	wood other than mentioned in 20 01 37	
20 01 39	plastics	
20 01 40	metals	
20 02	garden and park wastes (including cemetery waste)	
20 02 01	biodegradable waste	Sorting (with loading shovel 360°
20 02 02	soil and stones	excavator or by hand) Manual separation (via picking line)
20 03	other municipal wastes	
20 03 01	mixed municipal waste	Sorting (with loading shovel 360°
20 03 03	street-cleaning residues	excavator or by hand) Manual separation (via picking line)

2.2.2 The following EWC codes in Table 2.2 are proposed to be included in the permit for the physical treatment facility including the proposed treatment activities.

Table 2.2 - Proposed EWC codes - PTF

Waste Code	Description	Treatment activity
01	WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS	
01 04	wastes from physical and chemical processing of non-metalliferous minerals	
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07	Trommel and Screening
01 04 09	waste sand and clays	
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 03	plant-tissue waste	Shredding
02 01 07	wastes from forestry	Sinedunig
03	WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE PULP, PAPER, AND CARDBOARD	
03 01	wastes from wood processing and the production of panels and furniture	
03 01 01	waste bark and cork	Shredding
03 03	wastes from pulp, paper and cardboard production and processing	
03 03 01	waste bark and wood	Shredding
10	WASTES FROM THERMAL PROCESSES	
10 01	Wastes from power stations and other combustion plants (except 19)	
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)	Trammal and Caracaina
10 01 02	coal fly ash	Trommel and Screening
10 01 03	fly ash from peat and untreated wood	
10 12	wastes from the manufacture of ceramic goods, bricks, tiles, and construction products	
10 12 08	waste ceramics, bricks, tiles, and construction products (after thermal processing)	Trommel and Screening

15	WASTE DACKACING, ADCORDENTS, WIDING	
15	WASTE PACKAGING: ABSORBENTS, WIPING	
	CLOTHS, FILTER MATERIALS AND	
	PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED	
15 01	packaging (including separately collected	
1501	municipal packaging waste)	
15 01 03	wooden packaging	Shredding
17	CONSTRUCTION AND DEMOLITION WASTES	
	(INCLUDING EXCAVATED SOIL FROM	
	CONTAMINATED SITES)	
17 01	concrete, bricks, tiles, and ceramics	
17 01 01	concrete	
17 01 02	bricks	
17 01 03	tiles and ceramics	Trommel and Screening
17 01 07	mixture of concrete, bricks, tiles, and ceramics	
	other than those mentioned in 17 01 06	
17 02	wood, glass and plastic	
17 02 01	Wood	Shredding
17 03	bituminous mixtures, coal tar and tarred products	
17 03 02	bituminous mixtures other than those	Trommel and Screening
	mentioned in 17 03 01	Tronnier und sereening
17 05	soil (including excavated soil from contaminated	
47.05.04	sites), stones and dredging spoil	
17 05 04	soil and stones other than those mentioned in 17 05 03	
17 05 06	Dredging soil other than those mentioned in 15	1
17 03 00	05 05	Trommel and Screening
17 05 08	track ballast other than those mentioned in 17	
	05 07	
17 08	gypsum-based construction materials	
17 08 02	gypsum-based construction materials other than	Trommel and Screening
	those mentioned in 17 08 01	Hommer and Screening
17 09	other construction and demolition wastes	
17 09 04	mixed construction and demolition wastes other	
	than those mentioned in 17 09 01, 17 09 02 and	Trommel and Screening
17 09 04	17 09 03 Mixtures of soil, bricks, stones and concrete	
	WASTES FROM WASTE MANAGEMENT	
19		
	FACILITIES, OFF-SITE WASTEWATER	
	TREATMENT PLANTS AND THE	
	PREPARATION OF WATER INTENDED FOR	
	HUMAN CONSUMPTION AND WATER FOR	
19 08	INDUSTRIAL USE	
19 08	Wastes from wastewater treatment plants not otherwise specified	
19 08 02	waste from desanding	Trommel and Screening
19 12	wastes from the mechanical treatment of waste	
	(for example sorting, crushing, compacting,	
	pelletising) not otherwise specified	
19 12 07	wood other than that mentioned in 19 12 06	Shredding
19 12 09	minerals (for example sands, stones)	Trommel and Screening
19 12 12	other wastes (including mixtures of materials	Trommel and Screening
	comprising non-hazardous residual waste from	
	waste management facilities mechanically	

	treating EWC chapters 15, 17 and 20 coded non- hazardous household, commercial, industrial or municipal waste other than those mentioned in 19 12 11)	
19 12 12	Other wastes (residual waste not containing hazardous substances from waste management facilities mechanically treating 17 01 01, 17 01 02, 17 01 03, 17 01 07, 17 05 04, 17 09 04, 20 02 02 only and other than those mentioned in 19 12 11).	Trommel and Screening
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 38	wood other than that mentioned in 20 01 37	Shredding
20 02	garden and park wastes (including cemetery waste)	
20 02 01	Biodegradable waste	Shredding
20 02 02	soil and stones	Trommel and Screening

2.3 <u>Limits of Activities</u>

2.3.1 The limits of activities for each operation are set out in Table 2.3 and Table 2.4 below:

Table 2.3 - Proposed limit of activities - hazardous waste transfer

TABLE S1.1 activities		
Activity reference	Description of activities for waste operations	Limits of activities
A1: Hazardous waste transfer	R3: Recycling/reclamation of organic substances which are not used as solvents	Treatment consisting only manual sorting and separation of waste for disposal (no more than 50 tonnes per day) or recovery.
station	R4: Recycling/reclamation of metals and metal compounds	No more than 75,000 tonnes of waste will be accepted at the site per annum.
	R5: Recycling/reclamation of other inorganic materials	All wastes, other than specified wastes shall be stored and treated on an impermeable surface with sealed drainage system.
	R13: Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary	There shall be no treatment of asbestos waste including compaction of compression by mechanical or manual means.
	storage, pending collection, on the site where it is produced)	Treatment of waste batteries shall consist of manual sorting only.
	D15: Storage pending any of the operations numbered D1	Treatment of WEEE shall consist of manual sorting only.
	to D14 (excluding temporary storage, pending collection, on the site where it is produced)	Temporary storage of hazardous waste shall not exceed 50 tonnes.

Table 2.4 - Proposed limit of activities – Physical Treatment Facility

TABLE S1.1 activities		
Activity reference	Description of activities for waste operations	Limits of activities
A2: Physical treatment of non- hazardous waste	R3: Recycling/reclamation of organic substances which are not used as solvents R5: Recycling/reclamation of other inorganic materials	Treatment consisting only manual sorting, screening, shredding, blending, or compaction of waste into different components for disposal (no more than 50 tonnes per day) or recovery.
	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)	No more than 75,000 tonnes of waste will be accepted at the site per annum. All wastes, other than specified wastes shall be stored and treated on an impermeable surface with sealed drainage system.

3 <u>Documentation and Fees</u>

3.1 Application fee

3.1.1 Table 3.1 sets out the fees required for the application.

Table 3.1 - Base Application Fee

EPR Charging Scheme Ref	EPR Charging Scheme Ref & Description	Type of application	Fee
1.16.12	Physical treatment of non-hazardous waste.	Normal variation	£7,930
		TOTAL	£7,930

3.2 Other fees

3.2.1 Table 3.2 sets out the documentation to be submitted with this application:

Table 3.2 – Additional Application Fees - Charges for plans and assessments

General	Consideration	Document & Ref	Fee
Forms Part A, C2, C4 & F1	Mandatory	N/A	N/A
Evidence of technical competence	Mandatory	TBP-3361-G	N/A
Environmental Management System	Mandatory	TBP-3361-A	N/A
Fire Prevention Plan	Considered necessary due to treatment of combustible waste types	TBP-3361-B	£1,241
Emissions Management Plan	Considered necessary due to proximity of sensitive receptors	TBP-3361-F	£1,241
Odour Management Plan	Considered necessary due to waste types and proximity of sensitive receptors	TBP-3361-E	£1,246
Noise & Vibration Management Plan	It was confirmed during pre-application advice obtained from the Environment Agency that no Noise Management Plan is required.	N/A	N/A
Pests Management Plan	Considered unnecessary due to no historic pest issues arising at the site and no additional waste types being proposed.	N/A	N/A
		TOTAL	£3,728

3.2.2 Based on the above, the total fee payable to the Environment Agency on submission will be £11,658.

3.3 <u>Document references</u>

3.3.1 Table 3.3 below summarises which parts of the application forms request the above documentation which would normally be completed in Application Form Part F1; Section 6.

Table 3.3 – Application Form Reference Table

Application Form	Question Ref	Document Ref
Part C2	2b & Table 1	TBP-3361-C
Part C2	3b	TBP-3361-G
Part C2	3d	TBP-3361-A
Part C2	5a	TBP/3361/01, TBP/3361/02, TBP-3361/03, TBP-3361/04 – also found in Appendices of main documentation
Part C2	5c	TBP-3361-C
Part C2	5d & 5e	TBP-3361-B
Part C2	6	TBP-3361-D
Part C4	1 & Table 1a	TBP-3361-C

3.4 <u>Directors details</u>

3.4.1 Table 3.4 below provides details of directors and company secretaries.

Table 3.4 - Director details

Name	Date of Birth	Position
Hugh Brooks		Secretary
Joseph Henry Lively		Director
Simon Lively		Director

Appendix I Pre-application advice



Chris Parry Our reference: EPR/TP3595FH/P001

By email only Date: 04/07/2024

Dear Chris Parry

Pre application advice - Enhanced service

Site: Quickskip (Hereford) Transfer Station, Thorn Business Park, Hereford, HR2 6JT Thank you for your pre application enquiry on 31/05/2024.

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 emails recorded on the following dates:

Emails on 13/06/2024 and 17/06/2024

Due to the age of the permit and the number of modifications already made, we strongly advise that you update the permit to modern conditions as part of the proposed variation. See question 2c1 on form Part C2.

You propose to vary the permit to add a shredding activity for wood and green waste. Some waste wood will be hazardous. Hazardous waste wood may be routinely handled as chemically treated but misclassified as non-hazardous and the operator will need to ensure that they are adequately assessing the waste wood received at the site and that it is indeed non-hazardous. If the site intends to accept hazardous wood then IED limits will be quickly exceeded so the activities will likely be an installation.

For advice on whether the proposed variation could make the site an installation, please see RGN 2 sections 5.3 and 5.4:

https://www.gov.uk/government/publications/rgn-2-understanding-the-meaning-of-regulated-facility

Please also see RPS 249 https://www.gov.uk/government/publications/receiving-hazardous-waste-wood-at-household-waste-recycling-centres-rps-249

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And RPS 291 https://www.gov.uk/government/publications/storing-and-treating-hazardous-waste-wood-rps-291

What this enhanced pre application advice covers

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

Application reference number	EPR/TP3595FH/P001	
	1.16.12 £7,930 (as you are adding a new physical treatment activity)	
Application charge required	£779 habitats assessment	
	Plus additional management plan fees (please see below)	
Forms required to be submitted	A, C2, C4 and F1 Please see link below	
	Fire Prevention Plan (FPP) £1,241	
Additional documents required	Dust and Emissions Management Plan (DEMP) £1,241	
	And possibly an Odour Management Plan (please see below) £1,246	

To vary the permit you must provide the correct forms and supporting information.

To change (vary) a bespoke permit, you must complete application forms A, C2, C4 and F1.

Forms and guidance to change (vary) your environmental permit

Risks from Noise and Vibration, Industrial and Commercial Sound and Noise Management Plans

We have carried out a screening check and can confirm that a Noise Impact Assessment and Noise Management Plan are not required for the proposed application.

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Amenity management plans

You must read our guidance on how to <u>control and monitor emissions for your</u> environmental permit.

This includes guidance on controlling pollution from odour, dust, noise, pests and other 'fugitive emissions' (emissions without set emission limits).

Your amenity management plan(s) will be assessed as part of your application. You may need to pay an additional charge for the assessment. Further information on this is included in the 'How much will my permit cost' section above.

We advise that a Dust and Emissions Management Plan (DEMP) is required as you propose to introduce a shredding activity. If you believe that no DEMP is required to be submitted with your application, you will need to justify this in your risk assessment, however please be aware that you may still be asked to submit a DEMP as part of the duly making or determination of the application.

An Odour Management Plan (OMP) may be required for the proposed variation. We recommend that you include in your Environmental Risk Assessment an assessment of the risk of odour and the potential for it to increase as a result of the proposed shredding of the waste types listed in the pre-application enquiry form. Where the risk assessment shows that odours are a key issue, you must send us an odour management plan.

Environmental Risk Assessment

You must consider the environmental risk posed by your variation proposal. 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 <u>risk assessments for specific activities</u> 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 <u>check if your site is located in a flood risk zone</u>. If the site is in a flood zone, you should assess the risk of pollution in the event of a flood.

Fire Prevention Plan (FPP)

Your proposal requires a Fire Prevention Plan (FPP). You must follow our <u>guidance on</u> Fire Prevention Plans. This tells you what to include in your FPP and the fire prevention

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measures you must put in place. We have also produced a <u>Fire Prevention Plan template</u> to help you prepare your plan.

Non-Technical Summary

You need to send us a simple explanation of the activities and what changes you propose to make under the variation. 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.

Environmental Management System (EMS)

An update to your EMS may be required for variation applications to incorporate the proposed changes. You should follow the <u>guidance on developing a management system</u> and the guidance available with the application forms.

Technical Competence

If your activities include waste management you must meet <u>legal operator and competence requirements</u>. If the proposed permit variation changes the level of technical competence required, 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. You may wish to speak to your assessor to check the suitability of the current award for the proposed new activity.

If you are supplying WAMITAB certificates as evidence of your technical competency, you need to provide both the original award certificate and a current certificate of continuing competence (if the validity of your original award has expired).

Exemptions

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has limits and conditions that you must meet.

To find out if there is an exemption for your waste operation, and check that you meet the conditions, read the Waste Exemptions guidance.

Future reforms to waste exemptions will mean exemptions cannot be registered at or adjacent to (where there is a direct link) permitted waste operations or installations. Waste exemptions cannot currently be used on a permitted installation. For further details including transition periods, please read Waste Exemptions – Getting Ready for Change.

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We do not expect changes to the Environmental Permitting Regulations (EPR) before 2025. The exact date depends on parliament and its legislative programme.

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 is validated and duly made, it is ready to be allocated for determination.

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.

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 or water discharge or groundwater activity specific substances assessment.

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

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What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/TP3595FH/P001

If the advice above details using the <u>online digital application form</u>, your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

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

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 activities 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 £200 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 helen.gregory@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.

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If you have any questions please call 0203 02 52709.

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 <u>Environmental permits privacy notice</u>, you do not need to take part in this user research.

Yours sincerely

Helen Gregory

Permitting Officer

helen.gregory@environment-agency.gov.uk

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