

Sirius Environmental Ltd

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Via E-mail to: <u>Jake.Walker@environment-agency.gov.uk</u>

Date: 29th July 2024

Our Ref: MS1037/11/01

Your Ref: EPR/AB3438RY/V006

Dear Jake,

ENVIRONMENTAL PERMIT VARIATION APPLICATION: EPR/AB3438RY/V006
THE MYTUM AND SELBY WASTE RECYCLING FACILITY, MORLEY STREET, HULL, HU8

Please find below additional information in response to the email query issued on 19th July 2024.

Additional Fee

Unfortunately, the application payment you sent is incorrect. The correct application charge is £29,520.00. This leaves a balance of £7,367.10 to pay.

Response

With regards to application fee, the amount paid was calculated based on the guidance set out on the GOV.UK website, more specifically the following section:

There are 2 special cases where the application charge for secondary activities is calculated at 10% of the relevant charge. These are an application for:

 a hazardous waste installation treatment activity with associated storage of hazardous waste – the application charge for the associated storage will be 10% of the relevant application charge The reasoning for this is due to the hazardous storage requirements being intrinsically linked to the S5.3 activity being applied for, and as such is not an entirely new separate activity. The reasoning for the application fee that has been paid was also included within the supporting statement sent along with the application under Section 1.4 and Table 1.

Storage Tanks

1. Please confirm if the only increase in storage to hazardous wastes is the 2 new storage tanks. If there are any other new storage areas, then we require full details on these changes throughout the application.

Response

Previously the maximum quantity of waste stored at the site at any one time would be limited to 50 tonnes. This quantity would be spread across various bays at any time depending on the hazardous characteristics and their stage of treatment, which could mean that all bays that were allocated for the storage of hazardous waste at any one time would not be full. The increase in the facilities hazardous waste storage capacity will mean that the facility will be capable of storing more wastes in various bays/tanks at any one time. A reconfiguration of the existing storage layout and facilities has been put forward in the application relating to the storage of hazardous wastes, including:-

- Reconfiguration of the bays in the hazardous waste treatment Building from Bays 9-15 to bays R1-R13.
- Increased in the footprint and capacity of hazardous waste storage bay 'H1'
- Addition of storage bund B
- Addition of 2 No. skips for shredded hazardous waste
- Addition of 2 No. storage tanks for hazardous waste (or wash plant effluent)
 (120 tons cumulatively)
- Addition of 2 No. storage tanks for flammable and hazardous liquids (18 tons cumulatively)

Additionally, in preparation of this response, it was noted that the site layout plan did not illustrate the locations of the two 9,000-litre storage tanks for hazardous liquids, as specified in Table 3 of the Supporting Statement. A revised Site Layout Plan (**Drawing No MS1037/08/03**) is therefore attached. These tanks will be stored in a reinforced concrete bund

construction built to the specification of CIRIA c736.

Details of the revised hazardous waste storage capacities are presented in the Supporting Statement to the application (*Doc. Ref.: MS1037/05*).

2. Please confirm which waste codes are to be stored in the new storage tanks.

The EWC codes for the hazardous wastes that will be stored in the tanks are 16 03 03* and 16 03 05*. The effluent/waters produced by the washing operations will be coded as either 16 10 02 and 19 02 03, both of which are non-hazardous.

3. Please provide an assessment for the new storage tanks against points 41 to 52 of the chemical waste: appropriate measures for permitted facilities - section 4. Waste storage, segregation and handling appropriate measures.

The conversion/upgrade of the two 60m3 capacity tanks are currently in their infancy, with a company that specializes in non-destruction testing and inspection of storage/containment infrastructure having been contracted recently to undertake the work necessary to recommission them. As a result of this, a pre-operational condition is sought where all relevant information, including that specified in points 41 to 52 of the chemical waste: appropriate measures for permitted facilities - section 4. Waste storage, segregation and handling appropriate measures, will be provided prior to its operation. Furthermore, TesTex NDT Ltd will also be incorporating the two 9,000 litre flammable and hazardous liquid storage tanks and their bund into the schedule of works for non-destructive testing, and therefore this preoperational condition is also sought to include these tanks.

I trust that the responses provided in this covering document and the attached satisfies your queries.

Yours sincerely

D Rowe

David Rowe Environmental Consultant For and on behalf of Sirius Environmental Ltd