

## Waller, Nicola

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**From:** Adam Stone <adam.stone@sol-environment.co.uk>  
**Sent:** 05 August 2022 15:35  
**To:** Dunmore, Katie  
**Cc:** Emily Hingston  
**Subject:** RE: GED Environmental additional information required  
**Attachments:** SOL1812GED01 - Not Duly Made Reponse.pdf; SOL1812GED01 Fire Prevention Plan v2.pdf; Annex A2 - Site Layout Plan\_updated.pdf

Hi Katie,

Please find attached a response document, update site layout, and updated FPP.

Kind regards,

**Adam Stone | Sol Environment**

Malvern | Bristol

**t:** 01179 372 811 **m:** 07508 430 108

**e:** [adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk) **W:** [www.sol-environment.co.uk](http://www.sol-environment.co.uk)

**a:** Unit 5.3 Paintworks, Arnos Vale, Bristol, BS4 3EH

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**From:** Dunmore, Katie <katie.dunmore@environment-agency.gov.uk>

**Sent:** 26 July 2022 16:14

**To:** Adam Stone <adam.stone@sol-environment.co.uk>

**Subject:** FW: GED Environmental additional information required

Hi Adam,

As discussed, please provide the requested information by Friday 5<sup>th</sup> August.

Kind regards

**Katie Dunmore**

**Permitting Officer**

**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

*mob: 07584 369561*

**8** [katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)

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**From:** Dunmore, Katie  
**Sent:** 21 July 2022 15:18  
**To:** Adam Stone <[adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk)>  
**Subject:** GED Environmental additional information required

Hi Adam,

Following on from my previous email the above application doesn't contain enough information to duly make. There are many questions which I was hoping to tackle once the application was in determination but having reviewed the submission further I have identified too many basic questions which need answers before we can full understand the activities. These will then likely require deeper exploration during determination.

The fundamentally concern is the application does not recognise the mixing and blending activity as a treatment and that the tank vents are not recognised as a point source emissions which may be subject to BAT-AELs and will certainly require monitoring. As detailed within our chemical waste guidance you must provide information on the relevant characteristics of these point sources.

You must provide details of which EWCs (or groups of) will be mixed and the purpose of this mixing. The application documents indicate mixing may also occur in drums and IBC's. If this is the case provide details of where this will occur and the measures in place to prevent emissions.

Note: The FPP states no mixing of waste occurs on site. Along with hazardous liquids the application details bulking will take place, please therefore clarify and revise this statement.

We also require clarification on the range of wastes proposed for inclusion in the permit. Individual suitability will be assessed during determination but the EWC list contains many wastes which are not oily, not from garage activities and may pose different hazardous characteristics to waste oils. Reactions may develop. Please explain fully why non-oily liquid and solid wastes are included. Detail where they will be stored with quantities. This information must be considered when characterising vent emissions.

Provide further details on the bulking and repackaging of solid wastes particularly emissions control when containers are opened etc.

Please explain the site plan. What is the washdown area? Are containers/drums washed on site?. If container washing is proposed you must provide full details of the activity. Process effluent generated by this activity will require assessment and inclusion in the permit. Full details of how you characterise emissions and pollutants present in any wash water must be provided. Explain what the tank filling points and collection gully's are used for.

The FPP makes vague reference to oily rags and filters but all combustible wastes such as packaging and plastics must be clearly detailed. You must revise the FPP to clearly detail the EWCs to which the FPP directly relates, provide information on storage location, maximum storage volume etc. This must then link directly to the water supply calculations. Assessment of the document will be undertaken during determination but from scan reading many points will require full revision. The document makes a number of statements without considering how activities are actually undertaken such as max storage times, firewater containment etc (presumably within containers), firewater calcs. You may want to consider this further at this stage. Similarly if flame detectors and CCTV are stated for detection dull details of there use must be provided such as how and when they are monitored etc must be provided. If a quarantine area for fire is used you must explain how waste containers are moved in the event of fire etc.

The site plan must include the locations of **all** waste stored and maximum storage quantities of each area tank, location etc. As discussed above, all wastes must be accounted for. Batteries and aerosol containers don't appear to be included.

It would be useful to chat the application through further and submission timescale. I'm free all day tomorrow.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

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## Waller, Nicola

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**From:** Adam Stone <adam.stone@sol-environment.co.uk>  
**Sent:** 18 July 2022 10:00  
**To:** Dunmore, Katie  
**Cc:** Sophie Rainey  
**Subject:** RE: Permit application EPR/QP3631QX/A001 GED Environmental Services Ltd

Hi Katie,

Apologies I have just received further information from the client. The 26 IBCs for non-haz waste was the total to be stored in the flexible storage areas and another 26 IBCs combined for the oil filters, rags, etc. in the main storage areas. Therefore, a total of up to 50t at any one time on site would be a more appropriate limit.

The rest of the below email still stands.

Kind regards,

**Adam Stone | Sol Environment**

Malvern | Bristol

**t:** 01179 372 811 **m:** 07508 430 108

**e:** [adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk) **W:** [www.sol-environment.co.uk](http://www.sol-environment.co.uk)

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**From:** Adam Stone  
**Sent:** 18 July 2022 09:50  
**To:** 'Dunmore, Katie' <katie.dunmore@environment-agency.gov.uk>  
**Cc:** Sophie Rainey <sophie.rainey@sol-environment.co.uk>  
**Subject:** RE: Permit application EPR/QP3631QX/A001 GED Environmental Services Ltd

Hi Katie,

I have updated the application to include an FPP and Form F1 with the new waste activity. I have used 1.16.6 as you suggested previously. These are attached.

All non-hazardous EWC codes will be included under this activity.

Regarding volumes/tonnages, it is difficult to determine specific volumes for each so we're unsure how to include this on the permit.

All non-haz wastes brought onto site are stored in their original drums/IBCs or decanted into IBCs (5 drums to 1 IBC). As mentioned previously, batteries are stored in battery boxes and gas bottles stored in cages.

Up to 26 IBCs worth of these wastes are stored on site at any one time before being transferred off site for recovery/disposal elsewhere. An IBC can hold up to 800kg (heaviest waste), therefore up to 20.8t at any one time. The 5,200t per year accounts for up 250 "loads" (250 x 20.8) but in reality this is highly unlikely to be reached.

In terms of storage, drums and IBCs are stored in their marked areas on the site plan, and any other wastes are stored in the 'flexible' storage areas. Only one waste type will be stored in any of the 'flexible' storage areas at any one time. The site does not usually bring in non-haz waste other than oil filters and rags, therefore it is unlikely that more than 3 of the other EWC waste types are on site any one time. In the unlikely scenario there are no available areas for incoming wastes then these will not be accepted on site and diverted elsewhere.

Copies of pre-acceptance, acceptance, rejection, and waste reception and storage procedures are included in Annex D of the original application.

I hope this answers your questions but if you have any further requests please do not hesitate to contact us.

Please note I am on a course for 4 days this week with limited availability but will be back to full speed on Friday.

Kind regards,

**Adam Stone | Sol Environment**

Malvern | Bristol

t: 01179 372 811 m: 07508 430 108

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**From:** Dunmore, Katie <[katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)>

**Sent:** 05 July 2022 16:19

**To:** Adam Stone <[adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk)>

**Cc:** Sophie Rainey <[sophie.rainey@sol-environment.co.uk](mailto:sophie.rainey@sol-environment.co.uk)>

**Subject:** RE: Permit application EPR/QP3631QX/A001 GED Environmental Services Ltd

Hi

Adam,

Thanks for the response. Unfortunately we're unable to take the application forward for assessment without information on the garage wastes. The application document details the acceptance of up to 5200 tonnes per annum in drums but there appears no further information. As you state these will require appropriate storage with gas bottles in cages, batteries in boxes etc and we need to know this information. Similarly there is no de minimus amount for the storage of combustible non-hazardous waste and a fire prevention plan must be provided detailing the storage of these wastes. This however should be tailored to the level of risk. A simple document and plan will be fine provided they cover the points in the guidance such as quantities, separation etc. If small quantities of packaging and plastics are stored will make a judgement based on the level of risk but this information needs to be provided for us to assess.

Each activity must be defined within the permit and every waste accepted on site must be tied to a specific activity. It's for the operator to state what these are and link to the relevant EWC's, fundamentally we want to understand why wastes are included.

S5.6 does not cover the storage of non-hazardous waste by default. Non-hazardous wastes are subject to different activity descriptions as they are listed under S5.4 or regulated as waste operations. They are also subject to different guidance, specifically combustible waste requiring an FPP.

S5.6 covers the storage of all hazardous waste. We will be assessing how all wastes are handled and stored and why they are required, not just those directly associated with the main listed activity.

In order to progress this application for assessment you must confirm which EWCs are linked to which activity. You must provide details of waste acceptance and on-site procedures/storage information for the non-hazardous waste activity and additional hazardous wastes not so far detailed. A fire prevention plan must be provided. An additional charge will apply for the FPP however I don't consider a separate charge for a stand-alone waste activity is necessary. A revised F1 should be provided with this information.

I'm on leave until the 15<sup>th</sup>. Please therefore provide the requested information by Monday 18<sup>th</sup> July. After this time the application will be returned.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH  
mob: 07584 369561  
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**From:** Adam Stone <[adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk)>  
**Sent:** 29 June 2022 15:06  
**To:** Dunmore, Katie <[katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)>  
**Cc:** Sophie Rainey <[sophie.rainey@sol-environment.co.uk](mailto:sophie.rainey@sol-environment.co.uk)>  
**Subject:** RE: Permit application EPR/QP3631QX/A001 GED Environmental Services Ltd

Good afternoon Katie,

Please find below responses to your queries:

- **Site plan** - Please find a revised site plan attached which includes locations of fugitive emissions points (A1-9), surface water interceptors/emissions points (S1-3), and updated storage area to show locations of different wastes. The location of the 'proposed new building' in the originally submitted site plan has changed and has been added in the attached site plan. The additional entrance/security gate has been removed and the permit boundary adjusted to accommodate this building. This change has no impact on the activities being applied for.  
A separate drainage plan was included in the original application on the last page of 'Annex A – Figures Combined'. I have reattached it to this email.
- **BAT/Appropriate measures** – I have updated the BAT assessment in line with the different Chemical Waste guidance. Please find attached the BAT section of the application support document.
- **Waste activities** – I have discussed with the client and the oil filters, batteries, gasses in containers, etc. are to be accepted onto site under the 'Garage wastes' included in the application support document. As above, I have updated the site plan to show where these are to be stored ('flexible' storage areas). All wastes are stored appropriately; battery boxes for batteries, covered storage of oil filters, etc. Only one type of waste

will be stored in any of the 'flexible' bays at any one time. These wastes are not collected routinely but they are accepted to provide a 'complete service' to their clients. These wastes are managed in a similar way to the waste oils, in that they are collected and brought to site and bulked in appropriate containers before transfer off site for disposal or recovery elsewhere.

S5.6 is not specifically for the storage of liquid wastes, but any hazardous waste. Therefore, we believe all hazardous waste types included in the application are covered by this activity. Also, even though S5.6 is for storage of hazardous wastes, it is our understanding as a team that any activities included under a hazardous waste designation would also include non-hazardous wastes by default, and therefore there is no requirement for an extra activity.

- **Site Condition Report** – Some of the oils and other waste types on site are deemed 'relevant hazardous substances' due to them being capable of contaminating soil or groundwater. The Site Condition Report included in Annex C of the application submission includes all the required information from the EA H5 Guidance and site condition report template. The waste activities on site and their management, including kerbing, oil interceptors, concrete hardstanding on all storage areas, etc. minimise the risk from these potentially hazardous substances. This is reinforced by the Site Condition Report, Environmental Risk Assessment included in Annex B, and the attached BAT assessment.

Please do not hesitate to contact me if you require any further information.

Kind regards,

Adam Stone | Sol Environment

Malvern | Bristol

t: 01179 372 811 m: 07508 430 108

e: [adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk) W: [www.sol-environment.co.uk](http://www.sol-environment.co.uk)

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**From:** Dunmore, Katie <[katie.dunmore@environment-agency.gov.uk](mailto:katie.dunmore@environment-agency.gov.uk)>

**Sent:** 21 June 2022 16:35

**To:** Adam Stone <[adam.stone@sol-environment.co.uk](mailto:adam.stone@sol-environment.co.uk)>

**Subject:** FW: Permit application EPR/QP3631QX/A001 GED Environmental Services Ltd

Hi Adam,

I've received the above permit application for assessment. Before I continue and consider the application duly made the following additional information is required:

- Provide a revised **site plan** which identifies both the surface water (S1-S3) and air (AR1-AR9) emission points. You must also revise the drainage detail (a separate plan may be useful) to show the surface water flows to these points. The drainage plan must also indicate the direction of flow from the separate systems to the emission points. The plan at the moment shows water draining to the central drainage gullies. It's not clear how it is channelled from here via the interceptors offsite. Please include any kerbing or other measures to avoid the gravel areas.
- **BAT and Appropriate Measures.** The activities must be assessed against our Chemical Waste Guidance [Chemical waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk) Please therefore provide a revised BAT assessment in line with this.

- **Waste activities.** The application is for S5.3 A1(a)(iv) blending/repackaging and S5.6 storage of hazardous liquid wastes. The EWC table however contains a number of additional hazardous and non/hazardous wastes outside of this description. For example packaging wastes and filters prefixed 15 02. Oil filters, gasses in pressure containers and batteries prefixed 16 and municipal wastes including batteries and plastics prefixed 20.

The inclusion of these wastes requires separate assessment and must be permitted as separate waste activities. An additional fee must be provided. On the information provided so far I believe the activity will fall under Household, commercial and industrial waste transfer station. Ref 1.16.6 of our charging scheme £9,176.

Please clarify why these wastes are to be accepted and explain how they will be stored. You must revise the site plan to identify the storage locations. A separate Fire Prevention Plan must also be submitted in line with [Fire prevention plans: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-permits). The fee for the assessment of this is included in the above. The fee also includes the assessment of an odour management plan. It would be useful to understand quantities and why these wastes are required and then discuss the requirements.

- **Site condition report.** Please confirm if the site is storing “relevant hazardous substances”. If so you must identify the substances and include a stage 1-3 assessment. Please see our H5 Guidance <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>. The attached guidance and spreadsheet may help in considering this assessment.

Please provide the requested information within two weeks – 05/07/2022.

My contact details are below if you would like to discuss.

Kind regards

**Katie Dunmore**  
**Permitting Officer**  
**National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer**

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

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