

Technical Note



CLIENT:	Minster Surfacing Limited
PROJECT:	Permit Variation EPR/CB3707SB
SUBJECT:	Response to Duly Making Questions
JOB NO.:	ST20615
DATE:	July 2024
PREPARED BY:	Dominiqua Drakeford-Allen (Associate Director – Waste)

1.1.1 This note has been prepared on behalf of Minster Surfacing Limited to respond to questions raised by Francis Nwafor about their environmental permit variation application (EPR/CB3707SB).

1.1.2 The questions are set out below in **bold**, and responses follow.

1. Complete Section 2c of the Part C2 Form.

This section is now complete and Part C2 is included in this response.

2. Provide the original copy of the WAMITAB award certificate for your Technically Competent Manager – Paul Bird.

The TCM has now changed and is no longer Paul Bird. The TCM is now Ricky O'Brien, and the relevant forms have been updated with the details (see responses to questions 4 and 5).

3. Provide a summary of your management system.

An Environmental Management System Summary is provided in a standalone report submitted alongside this response note (Title Environmental Management System Summary, July 2024, V1).

4. Complete the table in Section 3b of the Part C2 Form by providing details of other sites that your Technically Competent Manager is supervising. You may enter 'not applicable' if that is the case.

Ricky O'Brien is TCM at one other Site, the details for which have been added to application form Part C2.

- 5. Complete question 3, Appendix 2 of the Part C2 Form by providing the date of birth information of your Technically Competent Manager.**

The TCM is now Ricky O'Brien, and his date of birth has been added to Application form Part C2.

- 6. Complete Section 5a of the Part C2 Form by providing a detailed layout plan that covers the full area of your site.**

The red line boundary on drawing ST20615-001 has been updated to correct the permit boundary to match the existing site plan in the permit. To confirm there are no changes to the existing permit boundary. Additionally, further annotation has been added to the drawing to provide more information. This revised drawing number is ST20615-001-B Site Layout.

- 7. Amend Table 3 of the Part C3 form and include in it, reference to the Chemical Waste Appropriate Measures guidance**

Application form Part C3 is amended to include reference to the appropriate measures.

- 8. Resolve the discrepancy in the details you provided in Table 2 and Section 4a of the Part C3 Form.**

Section 4 of Part C3 has been updated with a note 'see Technical Note dated July 2024/Operating Techniques'.

- 9. Provide information on the generator you are using in kWh and not in (KVA) and consider if you need to complete [C2.5 Form](#) and carry out air quality impact assessment in line with the Medium Combustion Plant Directive.**

The 60kVa generator is very small and assuming a typical power factor for diesel engines of 0.8 this would equate to a rating of 48kW. The generator will therefore have a thermal input well within the 1MW Medium Combustion Plant Directive size

limit. Therefore, MCPD should not be a consideration and no air quality impact assessment is required, nor monitoring. The generator is EU Stage IIIA certified.

10. Provide clear information on the quantity of waste that you are storing at any one time and treating/handling under the Asphalt Waste Containing Coal Tar (AWCCT) and Household, Commercial and Industrial Waste Transfer Station activities.

The table below provides the tonnages for waste treatment and storage for the AWCCT. The table also includes the tonnage for the HCI WTS activities, which are unchanged but provided for clarity.

Waste Storage and Treatment Volumes		
Activity	Description	Tonnage
Section 5.3 Part A(1) (a)	Physico-chemical treatment of for recovery of hazardous waste (AWCCT) exceeding 10 tonnes per day	50,000 tonnes per year
Section 5.6 Part A(1) (a)	Temporary storage of hazardous waste exceeding 50 tonnes	10,000 tonnes at any one time
Waste storage and treatment	Already Permitted (EAWML 100049)	25,000 tonnes

11. Confirm that the water that you are discharging to soakaway is clean, uncontaminated waters. If the water is contaminated, then, you must submit an appropriate risk assessment. The assessment must follow the methodology set out in Environment Agency guidance [Groundwater risk assessment for your environmental permit - GOV.UK](#)

To confirm, the AWCCT is stored in a covered area as shown on drawing ST20615-001 and will have bunding around the waste to ensure there is no potentially contaminated run off which could run across the site and into the drainage system. Any water in this area will be fully contained.

Only clean run off will be directed to the gully, then the interceptor then silt trap before going to the crated soakaway.

12. Paid an outstanding fee of £23,049. The fee you paid is less than the appropriate application fee for your application – see the attached spreadsheet for details of the fee calculations.

We have raised our concern regarding the charging scheme guidance which we understand has been raised previously internally but there is no current solution other than to pay the full fee and request abatement.

The fee we've been asked to pay is £23,049 in addition to the £16,421 already paid. The fee has now been paid.

We are applying to add new activities to the permit, however because the Charging Scheme Guidance excludes variations from the Charging Scheme reduction for associated activities at new sites (e.g. 90% reduction for the storage of hazardous waste associated with the hazardous waste treatment activity) the fee in this case is much higher than it would be for a new site carrying out exactly the same activity.

We request that the application fee is abated, and the time spent on the application is closely monitored during the assessment to ensure a partial refund of the difference at the end of the determination of the application.