


From: [Maggie Dutton](#)
To: [SM-Defra-RESP-notifications \(DEFRA\)](#); [Naomi Daniel](#)
Cc: [Ben Myles](#); [Stuart Moroney](#)
Subject: FW: EPR/QP3323MQ/A001 We Need More Information About Your Application CRM:0831158
Date: 01 June 2026 11:14:45
Attachments: 

Hi Naomi,

On behalf of GBCTR Ltd, please find our responses to your questions regarding the duly making process, set out in red text below.

I have also attached revised forms A and F1 as well as the FPP Drawing and TCM information that were sent with the original submission.

I trust this information gives you everything you need to duly make the application and continue the determination.

Kind regards,
Maggie

Maggie Dutton

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From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: 18 May 2026 13:33
To: Maggie Dutton <mdutton@slrconsulting.com>
Cc: Naomi Daniel <naomi.daniel01@environment-agency.gov.uk>
Subject: EPR/QP3323MQ/A001 We Need More Information About Your Application CRM:0831158

Dear Maggie Dutton

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/QP3323MQ/A001

Operator: GBCTR Limited

Facility: Lincoln Recycling Centre, Camp Road, Lincoln, LN6 9BJ

Thank you for your application received on 16/04/2026. The following is to confirm my answer phone message

of 18 May 2026.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions.

We need to know

Form B2

1: Provide a drainage map plan for the site

The plans provided show emission points but there is no sealed drainage plan showing how effluent is contained and removed from site.

[Develop a management system: environmental permits - GOV.UK](#)

The drainage system is shown on Drawing 4 – Fire Prevention Plan which was submitted with the application – see attached.

2: Provide evidence of continuing competence
with a EPOC certificate issued within last 2 years.

[Legal operator and competence requirements: environmental permits - GOV.UK](#)

Document App B2_2 TCM which was submitted with the application includes an EPOC certificate that was issued on 15 October 2025. See attached (note that the certificate is on the second page of the PDF).

3: Provide certificates for accreditations BS 8555 and ISO14001:2015 advised in your application

[Develop a management system: environmental permits - GOV.UK](#)

The site has not yet been constructed and is not operational. The management system is under development and will be in place by the time the site commences operation. A summary of what the management system will contain has been submitted with the application as required by the EA's guidance. Certification for management systems cannot be secured until they have been in operation for a year. Therefore, we do not believe that it is necessary to provide the certificates at this stage.

Form B3

4: Wastes to be accepted

1. How do you ensure only non-hazardous solar panels are accepted
2. Confirm the EWC codes you and activities you are applying for

You have requested 16 02 14 16 05 06, removing 16 02 13 covered in your enhanced pre application advice. Solar panels can be hazardous waste at end of life, depending on the type of panel, crystalline silicon, thin film Cdte and CIS panels. Demonstrate your process to show how you only accept non-hazardous solar panels.

Section 3.2 of the BAT-OT document submitted with the application sets out the Waste Acceptance and Pre-acceptance procedures for the site. This states that: *GBCTR will have waste pre-acceptance checks and feedstock specifications in place with suppliers to ensure that the waste has been characterised and classified appropriately before consignment to the site.*

GBCTR will not accept thin film Cdte or CIS panels on to site. If these panels are mistakenly sent, they will be quarantined and dealt with accordingly. The procedures for waste acceptance and dealing with non-conforming waste are described in Sections 3.3 and 3.4 of the BAT-OT.

Form F

5: Date the declaration

The declaration has not been dated. The declaration needs to be dated for it to be valid, please provide the date of signature.

An updated Form F1 is appended to this response.

6: Provide contact listed on companies' house for official documents.

7.2 Ben Myles is listed as a contact for official documents but is not registered on companies' house as a director or company secretary. Section 7.2 can list anyone listed on companies' house for the company or anyone listed on companies' house can provide a letter of authorisation for B Myles.

Form A has been updated to change the contact for receipt of official documents to Matthew Hazell, who is listed on companies house.

7: Provide further information on the bunded vented storage containers

1. Are these open vents or emergency pressure relief valves
2. Are these continuously venting
3. Are these making occasional spot emissions
4. These could be point source emissions to air which require assessing.

We note in your site layout plan you list the following

- *Bunded and vented electrolyte storage container*
- *Bunded and vented quarantine storage container*
- *Bunded and vented sodium hydroxide storage container*

The NGR's for the vents will be required for the permit, even if there are no parameters or emission limits for them.

Electrolyte storage: electrolyte in IBCs pending transfer off site will be stored in an enclosed container. This is still to be procured, but an example is shown below. The IBCs are fitted with over-pressure vents, which are not continuous emissions. The container in which the IBCs are stored will be fitted with a vent system to prevent buildup of any fugitive emissions, which will be routed to the thermal oxidiser. This means that there is no requirement for an additional release point.

Image



Sodium Hydroxide: venting is not required for these containers as the material is not volatile. This means that there is no release point to air.

Quarantine: this area is only for the temporary storage of any non-conforming solar panels that may arise following waste acceptance checks. The area is not enclosed and there is no release point to air.

In summary, there are no additional release points to air and there is no requirement for additional assessment as the modelling for the thermal oxidiser has assumed exit concentrations based on BAT-AELs.

Please reply directly to this email with your information and copy in naomi.daniel01@environment-agency.gov.uk.

You must send us the information by 02/06/2026.

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

Note: Our email system has a file size limit of 25MB, if your information exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions, please phone me on 02087 200395 or email naomi.daniel01@environment-agency.gov.uk.

Yours sincerely,
Naomi Daniel

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