

TRAFFORD PARK ENVIRONMENTAL PERMIT VARIATION: WET SEPARATION PROCESS

Non-Technical Summary

Prepared for: S. Norton & Co Limited

SLR Ref: 416.V64371.00002
Version No: 1
September 2023



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1.0 Introduction

S. Norton & Co Limited (S Norton) has retained SLR Consulting Limited (SLR) to prepare an Environmental Permit (EP) variation application for the Metal Recycling Facility located at Tenax Road, Trafford Park, Manchester, M17 1JT ('the Site'). The facility is currently operated under the Environmental Permitting (England and Wales) Regulations 2016 (as amended) (EPR) as an Industrial Emissions Directive (IED) installation in accordance with Environmental Permit EPR/XP3792C2/003 which was last varied on 31 October 2017.

The proposed changes to operations at the Site are summarised below:

- Addition of a wet separation treatment process and water treatment unit;
- Additional prescribed activity under Table S1.1 in the permit in the form of an existing mechanical separation process via a standalone Sensor-Based Sorting (SBS) Plant;
- Increase in annual waste throughput to 750,000 tpa;
- Extension of the permit boundary to include land to the west of the Site, including a new release point to sewer; and
- Addition of new EWC codes 17 04 10*, 19 02 04* and 19 12 11* in the permit due to the changes in the classification of hazardous waste.

In addition, the following amendments are proposed as part of the variation:

- Amendment to the prescribed activity under Table S1.1 in the permit ref. AR6 to include mechanical separation via Eddy-Current Separation (ECS) Plant as a prescribed activity and a waste activity due to a misdescription in the existing permit; and
- Amendment to the location of an existing authorised discharge to sewer.

This document provides a Non-Technical Summary (NTS) of the variation application including:

- An explanation of what is being applied for;
- A summary of the changes proposed to the facility; and
- A summary of the key technical standards and control measures relating to the proposed changes.

1.1 The Site

The Site is centred on National Grid Reference SJ 78827 97271, Land/premises At, Tenax Road, Trafford Park, Manchester, M17 1JT and is approximately 5.5.km west of Manchester city centre, and 3km southwest of Salford. The Site is accessed via a track approximately 200m off Tenax Road.

The Site is located within a commercial estate which lies to the south of the M602 motorway and to the north of the A5081. The Site is circa 5.17 hectares in area and roughly square with a rectangular section leading to Tenax Road.

1.2 Existing Facility and Operations

S Norton's Trafford Park facility is permitted as a multi-activity installation permit for ferrous and non-ferrous metal recycling including a metal fragmentiser (shredder), Shredder Waste Advanced Processing Plant (SWAPP), lead acid battery repackaging, non-ferrous metal processing, treatment of waste from electrical and electronic equipment and temporary storage of hazardous waste. The Site is used for the storage and treatment of materials with a substantial recyclable metallic content and is permitted to accept vehicle dismantling waste,

small mixed WEEE (SMW), mixed plastic wastes originating from WEEE and metal recycling/shredding waste from recycling facilities.

The Site is currently permitted to process up to 300,000 tonnes per annum (tpa).

The SWAPP is run separately by S Norton's sister company Axion Polymers (Axion) and lies within the Site boundary under the EP held by S Norton.

The Site processes SMW and light iron as separate infeed to the mechanical shredder. The separate outputs are then further treated to recover different metal fractions as well as sorting the plastics and other non-metallic residues for onward recovery. SMW residue and automotive shredder residue (ASR) are treated in the SWAPP as separate streams to remove any residual metals and further shredded to reduce material size to 10-15mm. Once processed, the resulting shredder residue is known as MAP30 (for both separately processed SMW residue and ASR) and predominantly consists of plastic/rubber chip with small quantities of wood and copper wire. Fractions with a metallic content are further treated in the metal recovery plant. The material resulting from the processing of SMW residue and ASR is then collected and stored temporarily on site prior to removal to Axion's Salford facility for further treatment.

The SWAPP building and storage areas benefit from impermeable surfacing and sealed drainage system. The Site has two discharge points to sewer under trade effluent consent with United Utilities. All site drainage is released to combined sewer.

There is an existing point source emissions to air from the main metal shredder (point ref. A1). Two additional point sources to air can be found on the SWAPP dust filters (point ref. A2 and A3). The main shredder plant is currently being replaced with an upgraded unit, however there will still be one principle point source emission to air (A1) from the activity. Emissions from the shredder will be directed to a stack via cyclonic separation to remove most of the hygroscopic particulate following the injection of water into the mill and then through a bag filter.

The Site is constructed on impermeable concrete surfacing with sealed drainage and there are no point source emissions to groundwater.

2.0 Proposed Modifications to the Permit

The proposed changes to the site operations and amendments to the permit are described in detail below.

2.1 Installation of Wet Separation Unit

Proposed modification

It is proposed to add a wet separation process consisting of a vibratory screen, wet separator and water treatment plant within SWAPP2 area of the process building (as shown on Drawing 02). This new process will integrate with the existing separation process when it is used to treat the two separate waste streams: residues from SMW as well as ASR.

The purpose of this process modification will ensure a greater amount of contamination is removed through the SWAPP process before being sent off site for further processing. A summary of the main stages of the new process are as follows:

- Material will first be screened to remove fines (> 1 mm in size) prior to processing to recover metal in the existing metal recovery plant;
- The screened material will be conveyed to a Wet Separator in SWAPP2 which uses water and gravity to concentrate metals into a "heavies" fraction;

- The 'heavies' will be processed by the existing metal recovery plant with the fines to recover the non-ferrous metals. The 'lights', consist mainly of plastic (~97%), with some wood and rubber will be coded as MAP08; and
- A Water Treatment Unit will be located in SWAPP2 and incorporated into the proposed new wet separation activity. The purpose of the unit is to process dirty wash water from the wet separation of screened material. The treated effluent will continuously overflow into a small clean water tank from where water will be recycled back into the separation process. The sludge from the bottom of the tank will be dewatered in a mechanical process to produce a dried waste cake.

The closed loop treatment unit will enable continuous reuse of water with the need only for infrequent discharge. If water is to be discharged, it will first be tested to determine if it meets the BAT /EA appropriate measures emissions limits. If the water is below the limits, it will be discharged to sewer via the existing release point to sewer (ref. W1). If the water does not meet the limits, it will be tankered out by an external water treatment company for treatment.

As a result of the addition of the new wet separator, there will be some additional changes to existing storage arrangements, as detailed in the BAT-OT (ref.: 416.V64371.00002_BATOT).

This proposed new activity will integrate with the existing separation process in the SWAPP facility and will be regulated under the existing prescribed activities AR3 (processing of non-hazardous waste) and AR4 (processing of hazardous waste) described in Schedule 1 of the EPR and Table S1.1 in the permit.

2.2 Amendment to include the existing Sensor Based Sorting (SBS) Plant as an additional Listed Activity

S Norton propose to include a sensor based sorting plant (SBS) in the permit for the separation of hazardous and non-hazardous waste. This existing plant is not currently listed as a prescribed activity under Table S1.1 in the permit. The existing SBS plant is a standalone treatment process that receives metal rich waste that contain a combination of other elements that typically include plastic, rubber, wood, aggregate and circuit boards. The SBS Plant uses a combination of two sensor based sorters which can detect metal and circuit boards using a range of sensor technology and eject these using air. All incoming wastes will have EWC waste codes that are listed on the current environmental permit. Refer to the BAT-OT (ref.: 416.V64371.00002_BATOT) for a detailed summary of the process.

This additional listed activity will be regulated as a new prescribed activity described in Schedule 1 of the EPR and Table S1.1 in the permit (processing of hazardous waste) and as a new waste operation (processing of non-hazardous waste).

2.3 Addition of New Waste Codes

Due to recent changes in the classification of hazardous waste, S Norton require additional waste codes to be included in the permit in order to continue to process waste types already treated at the site. These include:

- 17 04 10* - required due to the re-classification of cables and wiring;
- 19 02 04* - required due to the re-classification of some electrical wastes, namely SMW; and
- 19 12 11* - required due to the recent classification of ASR waste as hazardous by the EA as some of the outputs may contain substances above the threshold.

The facility is already authorised to accept hazardous waste and there are existing appropriate controls for these wastes in place.

2.4 Increase in Annual Throughput

Currently, the Site is permitted to receive up to 300,000 tonnes of waste per annum and S Norton wish to increase this to 750,000 tonnes per annum. The increase in throughput will be gradual, i.e., over a number of years.

Waste will move through the site more quickly by the adoption of more efficient handling and operational procedures. Therefore, the increase in throughput will not result in an increase in the existing maximum waste storage capacity at any one time, or the maximum duration that waste is stored at the site.

The increased throughput relates to the following two main activities at the site:

- S Norton are currently replacing the shredder with a new, upgraded, more efficient model and will operate this at a higher throughput than the previous unit;
- A greater amount of processed materials that meet international sales standards for furnace ready scrap will be received at the site for bulking up. These materials will be tipped at Trafford Park, inspected and graded at the Site to confirm quality and then re-loaded for transport to S Norton's export facility in Liverpool.

Risks to the environment as a result of the increased throughput of waste in the treatment processes listed above have been considered in the ERA (reference 416.V64371.00002_ERA).

This proposed increase in Site throughput through the main shredder plant will continue to be regulated as existing prescribed activities AR1 (shredding and granulation of non-hazardous waste) and AR2 (shredding and granulation of hazardous waste) described in Schedule 1 of the EPR and Table S1.1 in the permit.

2.5 Extension of permit boundary area to include land to the west

S Norton are seeking to extend the permit Site boundary to the west of the existing Site boundary to incorporate a small area directly adjacent to Tenax Road that currently consists of warehouse buildings and a car park (new permit boundary shown on Drawing 02).

There will be no new activities or wastes in addition to the proposed changes explained in the sections above, because of the extension of the permitted boundary, but there will be some re-arrangement of where they occur. There will also be a new release point to sewer located along where the new boundary runs along Tenax Road (ref. point W3). The outfall to the new release to sewer will capture uncontaminated rainfall from building structures and impermeable surfacing. The changes with regard to the re-arrangement of existing activities are not known at this point and therefore, the new layout, FPP and operating techniques will be updated and sent to EA for agreement in writing once the details are known. However, all storage and processing of waste in the new permitted area will be on impermeable surface with a sealed drainage system.

2.6 Amendment to include the existing Eddy-Current Separator (ECS) Plant as a Listed Activity

S Norton require an amendment of the activities listed in the permit to include the existing eddy current separator (ECS). This existing plant is a standalone treatment process that receives metal rich waste containing elements of plastic, rubber, wood, aggregate and circuit boards but was not listed as a discrete activity in the current permit. The ECS only treats wastes authorised under the current environmental permit. Refer to the BAT-OT (ref.: 416.V64371.00002_BATOT) for a detailed summary of the process.

This amendment of the existing listed activity 'AR6' will continue to be regulated as an existing prescribed activity described in Schedule 1 of the EPR and Table S1.1 in the permit (processing of hazardous waste) and as an existing waste operation (processing of non-hazardous waste).

2.7 Amendment to the location of an existing release point to sewer

The location of W1 is incorrectly shown on the Site Plan in Schedule 7 of the permit and is actually on Tenax Road. S Norton propose that the Site Plan in the permit is corrected to show the accurate location of W1 as illustrated on Drawing 02 and Drawing 05 of this EP variation application.

3.0 Pre-Application advice

Enhanced pre-application advice was sought from the Environment Agency (EA). A virtual pre-application meeting was held on 7th October 2022 and written advice was received on 26th October 2022. A copy of advice received from the discussions is provided in Appendix 01.

Note that the decision to include the proposed extension of the permit Site boundary in the application was made by S Norton following the EA issued pre-application advice on 26th October 2022.

S Norton intend to relocate some of the site activities onto an additional area of land within the permit boundary, however, the locations are not yet known. The decision to include the proposed extension of the permit Site boundary in the application was made by S Norton following the EA issued pre-application advice on 26th October 2022. It is proposed that an updated NIA would be carried out when the revised layout is known and that this would be submitted separately to this application.

All other relevant risk assessments have been updated to reflect any potential consequences to the surrounding environment and human health.

4.0 What is being applied for

4.1 Regulated Activities

Following pre-application advice from the EA, it was confirmed that the proposed changes to the operations at the site would require the following variations to the permit:

- | | | |
|---|--|---|
| 1 | Substantial Variation to the existing AR1 Activity – as the increase in throughput is above the threshold for listed activity | <i>Section 5.4 Part A(1)(b)(iv): Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day, involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.</i> |
| 2 | Substantial Variation to the existing AR2 Activity – as the increase in throughput is above the threshold for listed activity | <i>Section 5.3 Part A(1)(a)(ii): Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day, involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.</i> |
| 3 | Normal Variation to the existing AR3 Activity to include wet treatment of non-hazardous waste originating from the SWAPP Plant | <i>Section 5.4 Part A(1)(b)(iv): Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving physico-chemical treatment;</i> |

- | | | |
|---|---|---|
| 4 | Normal Variation to the existing AR4 Activity to include wet treatment of hazardous waste (including SMW) originating from the SWAPP Plant | <i>Section 5.3 Part A(1)(a)(ii): Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment;</i> |
| 5 | Substantial Variation to add a new activity for the mechanical separation and treatment of hazardous waste (including SMW and ASR) in the proposed Sensor Based Sorting Plant | <i>Section 5.3 Part A(1)(a)(ii): Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day, involving treatment in sensor sorting plant of metal rich waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.</i> |
| 6 | Substantial Variation to add a new activity for the mechanical separation and treatment of non-hazardous waste in the proposed Sensor Based Sorting Plant | <i>Waste operation.</i> |

In addition, the EA advised that the following activities would constitute an administrative variation only if the activities were not added to the permit variation granted in 2017 due to an error as part of the permit determination process:

- Mechanical separation treatment of hazardous waste (including SMW and ASR) via Eddy Current Separator Plant; and
- Mechanical separation treatment of non-hazardous waste via Eddy Current Separator Plant

S Norton have since confirmed that a table of installation activities with proposed changes including the non-ferrous plant activity was submitted to the EA as part of the 2017 permit variation application (as indicated in Appendix 02). Therefore, as confirmed by the EA in the pre application letter (a copy of which is provided in Appendix 01) it is considered that these activities should be added to the permit as an administrative variation.

4.2 Directly Associated Activities

The EA's pre-application advice did not identify any changes to the Directly Associated Activities as part of this permit variation.

4.3 Application Fees

Following enhanced pre-app with the EA on 7th October 2022, the EA advised on 26th October 2022 that the variation would consist of the following types and the changes would attract the fees listed below:

Table 4-1
Summary of variations, associated activities under Schedule 1 of the EPR and fees

Proposed change in permit	Type of variation, activity and charge reference	Fee
Increase in throughput (non-hazardous waste)	Substantial variation of the AR1 Activity - S5.4 A(1) (b) (iv) (charge reference 1.16.2.5)	£11,121
Increase in throughput (hazardous waste)	Substantial variation of the AR2 Activity - S5.3 A(1) (a) (ii) (charge reference 1.16.1.2)	£14,401
Addition of wet treatment of non-hazardous waste originating from the SWAPP plant	A normal variation of the AR3 activity - S5.4 A(1) (b) (iv) (charge reference 1.16.2.5)	£6,179
Addition of wet treatment of hazardous waste (including SMW and ASR) originating from the SWAPP plant	A normal variation of the AR4 activity - S5.3 A(1) (a) (ii) (charge reference 1.16.1.2)	£8,000
Addition of mechanical separation treatment of hazardous waste (including SMW and ASR) in the proposed Sensor Based Sorting Plant	An addition of a new activity under S5.3 A(1) (a) (ii) (charge reference 1.16.1.2)	£16,001
Addition of mechanical separation treatment of non-hazardous waste in the proposed Sensor Based Sorting Plant	An addition of a new waste operation.	£3,965
Inclusion of mechanical separation treatment of hazardous waste (including SMW and ASR) in the existing ECS Plant	Inclusion of a new activity under S.5.3 A(1) (a) (ii) Administrative only variation.	N/A
Inclusion of mechanical separation treatment of non-hazardous waste in the existing ECS Plant	Inclusion of a new waste operation. Administrative only variation.	N/A
Fire Prevention Plan	Charge reference 1.19.3	£1,241
Noise and Vibration Management Plan	Charge reference 1.19.7	£1,246
Total application fees		£62,154

5.0 Application Content

To support this application, the following documentation is submitted in addition to this NTS:

- Section 2: Application Forms Parts A, C2, C3, F1 and together with the following additional information:
 - Appendix C2_1_CMS_ISO_140001_Cert
 - Appendix C2_2_EMS Summary
 - Appendix C3_3_Energy efficiency measures
 - Appendix C3_4_ESOS Summary Report 141019
- Section 3: Drawings comprising:
 - Drawing 01 Site Location Plan

- Drawing 02 Permit boundary and Site Layout
- Drawing 03 Environmental site setting & Receptors
- Drawing 04 Cultural and Natural Heritage Receptors
- Drawing 04 Fire Prevention & Management
- Section 4: Site Condition Report
- Section 5: Best Available Techniques and Operating Techniques (BATOT)
- Section 6: Environmental Risk Assessment (qualitative assessments)
- Section 7: Air Emissions Risk Assessment
- Section 8: Surface Water Pollution Risk Assessment
- Section 9: Noise Impact Assessment
- Section 10: Fire Prevention Plan

6.0 Technical Standard and Control Measures

6.1 Technical Standards

The key technical standards that will be followed for the site, as advised in the EA's pre-application advice are:

- Best Available Techniques Reference (Bref) Document for Waste Treatment, European IPPC Bureau JRC, published 2018;
- Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities, gov.uk, 13 July 2022;
- Non-hazardous and Inert waste: appropriate measures for permitted facilities, gov.uk, last updated 8 December 2022;
- Chemical waste: appropriate measures for permitted facilities, gov.uk, 18 November 2020;
- Risk assessments for your environmental permit, Environment Agency, gov.uk, last updated 31 August 2022;
- Air Emissions Risk Assessment for your environmental permit, Environment Agency, gov.uk, last updated 22 March 2023; and
- Surface Water Pollution Risk Assessment for your environmental permit, Environment Agency, gov.uk, last updated 25 February 2022.

The pollution control measures relevant to the proposed changes in the permit and new activities are described in the BATOT and ERA documents submitted with the application.

The proposals have been assessed against and meet the technical standards described above.

The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed changes to the activities on Site.

APPENDIX 01

Pre-application Advice

Email from Francis Nwafor dated 26/10/2022 ref EPR/XP3792CT/V004

- Attached enhanced pre application advice letter (FINAL).pdf

Trina Westmoreland

From: Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>
Sent: 26 October 2022 16:12
To: Matt Sargent
Cc: Maggie Dutton; Mick Claes; Owen, David; PreApplication Service
Subject: EPR/XP3792CT/V004: Advice letter attached
Attachments: Enhanced pre application advice letter (FINAL).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Matt,

Please find the attached copy of the Environment Agency advice letter following the enhanced pre-application meeting on the 07/10/2022.

We consider this pre application request is now closed. If you require additional enhanced pre-application advice, then you will need to complete another [online form](#).

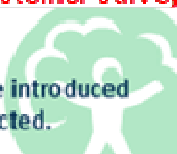
Regards.

Francis Nwafor PhD, LCIWM
Senior Permitting Officer
National Permitting Service ●●●● **Part of National Services E&B**
📞 Direct line: 020 30253237
(internal): 53237

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Matt Sargent
S. Norton & Co Limited
Tenax Road
Trafford Park
Manchester
M17 1JT

Our reference: EPR/XP3792CT/V004

Date: 26/10/2022

Dear Matt Sargent,

Pre application advice – Enhanced service

Site: Tenax Road, Trafford Park, Manchester, M17 1JT

Thank you for your pre application enquiry on 01/09/2022.

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 conversations/emails recorded on the following dates:

- Email and document received on the 29/09/2022.
- Telephone conversation/meeting on 07/10/2022.
- Emails and document received on the 25/10/2022.

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

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

Application reference number	EPR/XP3792CT/V004
Application charge required	<ul style="list-style-type: none"> ▪ Substantial variation of the AR1 Activity - S5.4 A(1) (b) (iv) (charge reference 1.16.2.5) - £11,121. Reason: increase in throughput above threshold for a listed activity. ▪ Substantial variation of the AR2 Activity - S5.3 A(1) (a) (ii) (charge reference 1.16.1.2) - £14,401. Reason: increase in throughput above threshold for a listed activity. ▪ A normal variation of the AR3 activity - S5.4 A(1) (b) (iv) - to include wet treatment of non-hazardous waste originating from the SWAPP plant (charge reference

customer service line 03706 506 506

floodline 03459 88 11 88

incident hotline 0800 80 70 60

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LIT 55346

2/8/2022

Application reference number	EPR/XP3792CT/V004
	<p>1.16.2.5) - £6,179. Reason: The addition of the wet treatment operation to this activity will change the nature of the activity and as such will attract a normal variation fee. This advice is provided on the basis that the wash plant will not operate as a standalone activity but always treat (in series) non-hazardous waste originating from the SWAPP plant.</p> <ul style="list-style-type: none"> ▪ A normal variation of the AR4 activity - S5.3 A(1) (b) (ii) (charge reference 1.16.1.2) - to include wet treatment of hazardous waste (including Small Mixed WEEE) originating from the SWAPP plant - £8,000. Reason: The addition of the wet treatment operation to this activity will change the nature of the activity and as such will attract a normal variation fee. This advice is provided on the basis that the wash plant will not operate as a standalone activity but always treat (in series) non-hazardous waste originating from the SWAPP plant. ▪ Total base fee = £11,121 + £14,401 + £6,179 + £8,000 = £39,701. <p>Relevant sections of the <u>Charging Guidance</u> – see Sections 3.5.2, 3.6.2 and 3.7.</p> <p>Section 3.7 (Variation for multiple activities on one permit) states that:</p> <p><i>If you want to vary a permit that covers more than one activity you must pay a variation charge for each activity you want to vary.</i></p> <p><i>If your change affects other activities on the same permit, that means they will also need to be changed. You will need to pay a variation charge for each of the other activities affected.</i></p> <p><i>The discounts that apply to multiple activities for new permits do not apply to variations. See section 2.12 which gives more information.</i></p> <p>Note:</p> <p>The operator indicated in an email received on the 25/10/2022 that there was a mistake in the list of the activities in their current permit. They stated that four activities (2 installation and 2 waste operation</p>

Application reference number	EPR/XP3792CT/V004
	<p>activities) were omitted from their permit during previous variations. These include:</p> <ul style="list-style-type: none"> ▪ S5.3A(1)A(ii) - Mechanical separation of hazardous WEEE using Eddy-current separation (ECS). ▪ S5.3A(1)A(ii) - Mechanical separation of hazardous WEEE using Induction Sorting System/Combination Sensor System (ISS/KSS). ▪ Mechanical separation of non-hazardous waste using ECS (Waste operation). ▪ Mechanical separation of non-hazardous waste using ISS/KSS (Waste operation). <p>The advice on fees and charges does not cover the alleged errors above. These need to be investigated and confirmed. Where these are investigated and confirmed, the changes will be considered as administrative only variation.</p> <p>Where we are not able to confirm the above, the four activities will attract new application fees (each) in their own right. The operator should have identified the error at the draft permit review stage.</p> <p>It is likely that the addition of the 2 installation and 2 waste operation activities will be attract an additional fee in the region of £25,531 = £16,001 + £1,600 + £3,965 + £3,965 (representing 100% + 10% +50% + 50% of the appropriate fee for each activity).</p>
Forms required to be submitted	<p><u>Part A Form</u>,</p> <p><u>Part C2 Form</u>,</p> <p><u>Part C3 Form</u>,</p> <p><u>Part F1 Form</u>; and maybe,</p> <p><u>Part C4 Form</u> if variation requires the addition of new waste operation activities to the permit (see the text in BOLD above).</p>
Additional documents required	<ul style="list-style-type: none"> ▪ Non-Technical Summary. ▪ Site layout plan that shows the locations of the new/replacement equipment and emission points.

Application reference number	EPR/XP3792CT/V004
	<p>Your plan should clearly mark the site layout, infrastructure and drainage arrangements.</p> <ul style="list-style-type: none"> ▪ Updated Environmental Risk Assessment that considers the additional risks associated with the proposed increase in waste throughput and the operation of the wet treatment plant. This must take the form of an environmental risk assessment which should follow the methodology set out in <u>risk assessments for your environmental permit</u>. You should read our guide to <u>risk assessments for specific activities</u> and consider using our assessment tool to evaluate your environmental risk. ▪ Updated waste pre-acceptance, acceptance and rejection procedures. ▪ Updated operating technique, including information on changes in the waste storage and handling procedures. ▪ Updated BAT assessment - you must demonstrate how you will meet any relevant Best Available Techniques (BAT) and emission limits set out in the <u>BREF for Waste Treatment, BAT Conclusions for Waste Treatment</u> and the Environment Agency <u>Non-hazardous and inert waste: appropriate measures for permitted facilities; Chemical waste: appropriate measures for permitted facilities; and Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities</u>. You must also provide an assessment to demonstrate how the site's infrastructure or equipment is designed to meet the requirements of the Waste Treatment BAT conclusions. ▪ Air quality assessment and/modelling for the replacement shredders. We have advise that you may need to carry out an assessment to demonstrate that the emissions from the replacement shredder that you intend to install are in compliance with the <u>BAT Conclusions for Waste Treatment</u>. Depending on the outcome of your initial environmental assessment, you may be required to

Application reference number	EPR/XP3792CT/V004
	<p>undertake detailed modelling of your environmental risk. If you need to assess the risk of emissions to air, use the air emissions risk assessment for your environmental permit guidance. You must carry out detailed modelling assessment on any emissions that you didn't screen out through your air emissions risk assessment. Your modelling report needs to follow the air dispersion modelling reports guidance.</p> <ul style="list-style-type: none"> ▪ Emission to water assessment. If you need to assess the risk of hazardous pollutants to surface water, you need to follow the surface water pollution risk assessment guidance. If you need to assess the risk from sanitary determinands you should follow the assessment of sanitary and other pollutants in surface water discharges methodology. If you need to undertake detailed modelling of the risk to surface water you should follow the surface water pollution risk assessment methodology. Note that the limits in Table 6.2 of BAT Conclusions for Waste Treatment will apply to your discharge to sewer. ▪ Noise Impact Assessment and Management Plan. We have advised that the proposed changes to your site operations is likely to increase the noise risks of your site. If your risk assessment shows your operation is likely to cause pollution from noise or vibration beyond your site boundary you must provide a noise impact assessment (NIA) based on BS4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound'. Where your assessment has used calculations or modelling to predict sound pressure levels at receptors, you must follow our guidance on the presentation of your acoustic data: Noise impact assessments involving calculations or modelling. We have attached some supplementary advice on producing a NIA. Your NIA must be accompanied by a Noise Management Plan based on the results of your NIA. We have attached a template to help you produce a noise management plan.

Application reference number	EPR/XP3792CT/V004
	<ul style="list-style-type: none"> ▪ Update accident prevention and management plan, including information on your emergency plans in the case of plant failure.
Additional information/advice	<ul style="list-style-type: none"> ▪ We have advised that you will need to carry out mass balance to demonstrate that the proposed increase in throughput will not result to an increase in the storage capacity of the site. Where the increase in throughput will result to an increase in the storage capacity of the site, an updated Fire Prevention Plan will be required together with the add-on fee of £1,241. ▪ Again, the mass balance must show the existing site activities and how they are linked to the proposed increase. If the increase in throughput is traceable to the existing Waste Operation Activity [Vehicle storage, depollution and dismantling (authorised treatment) facility], it will attract at least a minor technical fee of £2,652.
Your request and Environment Agency (EA) response	<ul style="list-style-type: none"> ▪ S. Norton request: Confirm the type of the Environmental Risk Assessments including point-source to air emissions and discharge to sewer. EA response: The environmental risk assessment to be carried out are detailed in the 'additional documents required' section above. ▪ S. Norton request: Confirm how the proposed additional activity will be regulated; EA response: The use of the wet plant for the treatment of hazardous waste will be regulated as an add-on to the existing S5.4 A(1) (b) (iv) and S5.3 A(1) (b) (ii) Installation activities on the understanding that it will not operate as a standalone process. ▪ S. Norton request: Confirm the scope of the application, type of variation (including application fee) and supporting documents required. EA response: The variation is considered as a substantial variation of four of the existing installation activities. The supporting information you need to provide are outlined in the 'additional documents required' section above

Application reference number	EPR/XP3792CT/V004
	<ul style="list-style-type: none"> ▪ S. Norton request: Confirm the guidance and standards that apply for the application, including the effluent release discharge to sewer via the existing release point. EA response: the standards and limits specified in the following need to be taken into consideration in your application. <ul style="list-style-type: none"> - BREF for Waste Treatment, - BAT Conclusions for Waste Treatment - Non-hazardous and inert waste: appropriate measures for permitted facilities; - Chemical waste: appropriate measures for permitted facilities; and - Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities. - As well as other guidance listed in the emission to air, water and noise sections above. ▪ S. Norton request: Identify any site-specific aspects which the EA will require the application to address. EA response: Considering the scale of the proposed waste increase, we have advised that you will need to secure an appropriate planning permission. While the permitting determination process will not be affected by the planning permission, we will take opinion and views of the local planners into consideration during the determination process.

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary

customer service line 03706 506 506

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Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Payment	Please note your application will not be processed until we receive the full payment.

What happens next?

If you submit an environmental permit application, then please quote this pre-application reference number: **EPR/XP3792CT/V004**

If the advice above details using the [online digital application form](#), 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

Current application timescales

Our current queues are large, and we are taking longer than usual to allocate work for initial assessment, known as duly making. The table below shows our estimated queue times by application type. Please note, this is based on our average times and some applications may be picked up before or after the timescales listed below.

Application type	Estimated time to allocation
New bespoke	33-37 weeks
New standard rules	23-27 weeks
Admin variation	20-24 weeks
Minor variation	26-30 weeks
Normal variation	32-34 weeks
Substantial variation	38-42 weeks
Transfer	20-24 weeks
Surrender	19-23 weeks
Medium Combustion Plant	19-23 weeks
Intensive Farming New bespoke	27-31 weeks
Intensive Farming Admin variation	16-20 weeks

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Intensive Farming Normal variation	26-30 weeks
Intensive Farming Substantial variation	26-30 weeks
Intensive Farming Transfer	16-20 weeks
Intensive Farming Surrender	18-22 weeks

Confidentiality and exceptions to disclosure

We note that you have made a claim for exception to disclosure with respect to information submitted as part of this pre-application request. This letter acknowledges receipt of your claim.

All the information you have given us about this pre-application request will not appear on the public register in accordance with our privacy notice. If the Environment Agency were to receive a request to see this information under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004 we would at that point assess your claim to decide if we should treat some of/all the information you have provided as non-disclosable and act accordingly.

If you make an actual permit application in the future and some of the information submitted to the Environment Agency as part of this pre-application request is relevant and needs to form part of that application, it is advisable to resubmit it to us again. This will allow you to make a relevant claim for commercial and industrial confidentiality or national security if you feel it is applicable and will expedite our assessment

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 installations and waste operations 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 £1,200 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

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We consider this pre application request is now closed however if you have any questions regarding this letter, please contact Francis Nwafor at francis.nwafor@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.

If you have any questions, please call 03708 506 506.

Yours sincerely

Francis Nwafor

francis.nwafor@environment-agency.gov.uk.

Matt Sargent
S. Norton & Co Limited
Tenax Road
Trafford Park
Manchester
M17 1JT

Our reference: EPR/XP3792CT/V004

Date: 26/10/2022

Dear Matt Sargent,

Pre application advice – Enhanced service

Site: Tenax Road, Trafford Park, Manchester, M17 1JT

Thank you for your pre application enquiry on 01/09/2022.

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 conversations/emails recorded on the following dates:

- Email and document received on the 29/09/2022.
- Telephone conversation/meeting on 07/10/2022.
- Emails and document received on the 25/10/2022.

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the [Environmental permitting charges guidance on GOV.UK](#).

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

Application reference number	EPR/XP3792CT/V004
Application charge required	<ul style="list-style-type: none"> ▪ Substantial variation of the AR1 Activity - S5.4 A(1) (b) (iv) (charge reference 1.16.2.5) - £11,121. Reason: increase in throughput above threshold for a listed activity. ▪ Substantial variation of the AR2 Activity - S5.3 A(1) (a) (ii) (charge reference 1.16.1.2) - £14,401. Reason: increase in throughput above threshold for a listed activity. ▪ A normal variation of the AR3 activity - S5.4 A(1) (b) (iv) - to include wet treatment of non-hazardous waste originating from the SWAPP plant (charge reference

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LIT 55346

2/8/2022

Application reference number	EPR/XP3792CT/V004
	<p>1.16.2.5) - £6,179. Reason: The addition of the wet treatment operation to this activity will change the nature of the activity and as such will attract a normal variation fee. This advice is provided on the basis that the wash plant will not operate as a standalone activity but always treat (in series) non-hazardous waste originating from the SWAPP plant.</p> <ul style="list-style-type: none"> ▪ A normal variation of the AR4 activity - S5.3 A(1) (b) (ii) (charge reference 1.16.1.2) - to include wet treatment of hazardous waste (including Small Mixed WEEE) originating from the SWAPP plant - £8,000. Reason: The addition of the wet treatment operation to this activity will change the nature of the activity and as such will attract a normal variation fee. This advice is provided on the basis that the wash plant will not operate as a standalone activity but always treat (in series) non-hazardous waste originating from the SWAPP plant. ▪ Total base fee = £11,121 + £14,401 + £6,179 + £8,000 = £39,701. <p>Relevant sections of the <u>Charging Guidance</u> – see Sections 3.5.2, 3.6.2 and 3.7.</p> <p>Section 3.7 (Variation for multiple activities on one permit) states that:</p> <p><i>If you want to vary a permit that covers more than one activity you must pay a variation charge for each activity you want to vary.</i></p> <p><i>If your change affects other activities on the same permit, that means they will also need to be changed. You will need to pay a variation charge for each of the other activities affected.</i></p> <p><i>The discounts that apply to multiple activities for new permits do not apply to variations. See section 2.12 which gives more information.</i></p> <p>Note:</p> <p>The operator indicated in an email received on the 25/10/2022 that there was a mistake in the list of the activities in their current permit. They stated that four activities (2 installation and 2 waste operation</p>

Application reference number	EPR/XP3792CT/V004
	<p>activities) were omitted from their permit during previous variations. These include:</p> <ul style="list-style-type: none"> ▪ S5.3A(1)A(ii) - Mechanical separation of hazardous WEEE using Eddy-current separation (ECS). ▪ S5.3A(1)A(ii) - Mechanical separation of hazardous WEEE using Induction Sorting System/Combination Sensor System (ISS/KSS). ▪ Mechanical separation of non-hazardous waste using ECS (Waste operation). ▪ Mechanical separation of non-hazardous waste using ISS/KSS (Waste operation). <p>The advice on fees and charges does not cover the alleged errors above. These need to be investigated and confirmed. Where these are investigated and confirmed, the changes will be considered as administrative only variation.</p> <p>Where we are not able to confirm the above, the four activities will attract new application fees (each) in their own right. The operator should have identified the error at the draft permit review stage.</p> <p>It is likely that the addition of the 2 installation and 2 waste operation activities will be attract an additional fee in the region of £25,531 = £16,001 + £1,600 + £3,965 + £3,965 (representing 100% + 10% +50% + 50% of the appropriate fee for each activity).</p>
Forms required to be submitted	<p><u>Part A Form</u>,</p> <p><u>Part C2 Form</u>,</p> <p><u>Part C3 Form</u>,</p> <p><u>Part F1 Form</u>; and maybe,</p> <p><u>Part C4 Form</u> if variation requires the addition of new waste operation activities to the permit (see the text in BOLD above).</p>
Additional documents required	<ul style="list-style-type: none"> ▪ Non-Technical Summary. ▪ Site layout plan that shows the locations of the new/replacement equipment and emission points.

Application reference number	EPR/XP3792CT/V004
	<p>Your plan should clearly mark the site layout, infrastructure and drainage arrangements.</p> <ul style="list-style-type: none"> ▪ Updated Environmental Risk Assessment that considers the additional risks associated with the proposed increase in waste throughput and the operation of the wet treatment plant. This must take the form of an environmental risk assessment which should follow the methodology set out in <u>risk assessments for your environmental permit</u>. You should read our guide to <u>risk assessments for specific activities</u> and consider using our assessment tool to evaluate your environmental risk. ▪ Updated waste pre-acceptance, acceptance and rejection procedures. ▪ Updated operating technique, including information on changes in the waste storage and handling procedures. ▪ Updated BAT assessment - you must demonstrate how you will meet any relevant Best Available Techniques (BAT) and emission limits set out in the <u>BREF for Waste Treatment, BAT Conclusions for Waste Treatment</u> and the Environment Agency <u>Non-hazardous and inert waste: appropriate measures for permitted facilities; Chemical waste: appropriate measures for permitted facilities; and Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities</u>. You must also provide an assessment to demonstrate how the site's infrastructure or equipment is designed to meet the requirements of the Waste Treatment BAT conclusions. ▪ Air quality assessment and/modelling for the replacement shredders. We have advise that you may need to carry out an assessment to demonstrate that the emissions from the replacement shredder that you intend to install are in compliance with the <u>BAT Conclusions for Waste Treatment</u>. Depending on the outcome of your initial environmental assessment, you may be required to

Application reference number	EPR/XP3792CT/V004
	<p>undertake detailed modelling of your environmental risk. If you need to assess the risk of emissions to air, use the air emissions risk assessment for your environmental permit guidance. You must carry out detailed modelling assessment on any emissions that you didn't screen out through your air emissions risk assessment. Your modelling report needs to follow the air dispersion modelling reports guidance.</p> <ul style="list-style-type: none"> ▪ Emission to water assessment. If you need to assess the risk of hazardous pollutants to surface water, you need to follow the surface water pollution risk assessment guidance. If you need to assess the risk from sanitary determinands you should follow the assessment of sanitary and other pollutants in surface water discharges methodology. If you need to undertake detailed modelling of the risk to surface water you should follow the surface water pollution risk assessment methodology. Note that the limits in Table 6.2 of BAT Conclusions for Waste Treatment will apply to your discharge to sewer. ▪ Noise Impact Assessment and Management Plan. We have advised that the proposed changes to your site operations is likely to increase the noise risks of your site. If your risk assessment shows your operation is likely to cause pollution from noise or vibration beyond your site boundary you must provide a noise impact assessment (NIA) based on BS4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound'. Where your assessment has used calculations or modelling to predict sound pressure levels at receptors, you must follow our guidance on the presentation of your acoustic data: Noise impact assessments involving calculations or modelling. We have attached some supplementary advice on producing a NIA. Your NIA must be accompanied by a Noise Management Plan based on the results of your NIA. We have attached a template to help you produce a noise management plan.

Application reference number	EPR/XP3792CT/V004
	<ul style="list-style-type: none"> ▪ Update accident prevention and management plan, including information on your emergency plans in the case of plant failure.
Additional information/advice	<ul style="list-style-type: none"> ▪ We have advised that you will need to carry out mass balance to demonstrate that the proposed increase in throughput will not result to an increase in the storage capacity of the site. Where the increase in throughput will result to an increase in the storage capacity of the site, an updated Fire Prevention Plan will be required together with the add-on fee of £1,241. ▪ Again, the mass balance must show the existing site activities and how they are linked to the proposed increase. If the increase in throughput is traceable to the existing Waste Operation Activity [Vehicle storage, depollution and dismantling (authorised treatment) facility], it will attract at least a minor technical fee of £2,652.
Your request and Environment Agency (EA) response	<ul style="list-style-type: none"> ▪ S. Norton request: Confirm the type of the Environmental Risk Assessments including point-source to air emissions and discharge to sewer. EA response: The environmental risk assessment to be carried out are detailed in the 'additional documents required' section above. ▪ S. Norton request: Confirm how the proposed additional activity will be regulated; EA response: The use of the wet plant for the treatment of hazardous waste will be regulated as a an add-on to the existing S5.4 A(1) (b) (iv) and S5.3 A(1) (b) (ii) Installation activities on the understanding that it will not operate as a standalone process. ▪ S. Norton request: Confirm the scope of the application, type of variation (including application fee) and supporting documents required. EA response: The variation is considered as a substantial variation of four of the existing installation activities. The supporting information you need to provide are outlined in the 'additional documents required' section above

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customer service line **03706 506 506**

floodline **03459 88 11 88**

incident hotline **0800 80 70 60**

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What happens next?

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Disclaimer

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This advice covers installations and waste operations 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 £1,200 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

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We consider this pre application request is now closed however if you have any questions regarding this letter, please contact Francis Nwafor at francis.nwafor@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.

If you have any questions, please call 03708 506 506.

Yours sincerely

Francis Nwafor

francis.nwafor@environment-agency.gov.uk.

APPENDIX 02

Proposed Changes Submitted by S Norton to the EA in 2017

	Name	Installation Schedule 1 references	Description of the installation activity	Proposed changes
Treatment activities	Metal Fragmentiser (shredder) - Treatment of Metal Waste	Section 5.4 A(1) b) (iv) - treatment in shredders of metal waste (R04) with a capacity over 75 tonnes per day.	Metal waste is processed through the sites 2000Hp metal fragmentiser (R04) to liberate ferrous, non-ferrous metals and residues in preparation for further recovery (R04) or temporary storage (R13) pending onward sale/ export to a metal smelter.	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
	Shredder Waste Advanced Processing Plant (SWAPP) - Fragmentiser residues	Section 5.4 A(1) b) (iv) - treatment in shredders of metal waste (R04) with a capacity over 75 tonnes per day.	Fragmentiser residues are subject to further separation; including the use of shredders (R04) to liberate ferrous/ non-ferrous metals and non-metallic fractions i.e. plastic, followed by temporary storage (R13) pending onward sale to other treatment operators, and may be subject to another recovery operation (R04), OR direct sale for use in marketable products. Fragmentiser residues are received from other S. Norton shredder sites (EAWML 53454) and are also received from other licenced treatment operators.	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
	Lead Acid Battery Treatment Operation (hazardous waste)	Section 5.3 A(1) a) (ii) - in relation to the recovery of hazardous waste in an installation with a capacity over 10 tonnes per day (R12).	Repackaging of lead acid batteries (R12), in preparation for onward sale to another recovery operation (R04). Note: Includes Lead Acid Batteries arising from the sites ELV depollution operation and individually consigned loads from other treatment operators.	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
	Non-ferrous plant (ECS) - treatment of wastes from electrical and electronic equipment (hazardous waste)	Section 5.3 A(1) a) (ii) - in relation to the recovery of hazardous waste in an installation with a capacity over 10 tonnes per day (R12).	Wastes from the treatment of electrical and electronic equipment from other regulated facilities are subject to further sorting/ separation (R04), to liberate non-ferrous metals and other components, followed by temporary storage on-site (R13).	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
Temporary storage activities	Temporary storage of soiled absorbent material (hazardous waste)	Section 5.6 A(1) a) - in relation to the temporary storage or underground storage of hazardous waste with a capacity over 50 tonnes (R13) - (aggregated with other hazardous waste storage activities on site)	Temporary storage of soiled absorbent material (R13) which are a by-product of using absorbent media to clean up accidental spillages or leaks of hazardous fluids i.e. from EoLV depollution activities, lead acid battery storage and maintenance activities or part failure pending disposal and/ or recovery at another regulated facility (D1-D15 or R1-R13).	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
	Temporary storage of wastes from electrical and electronic equipment (hazardous waste)	Section 5.6 A(1) a) - in relation to the temporary storage or underground storage of hazardous waste with a capacity over 50 tonnes (R13) - (aggregated with other hazardous waste storage activities on site)	Temporary storage of wastes from the treatment of electrical and electronic equipment from other regulated sites (R13), prior to further recovery (R04) on-site or pending disposal and/ or recovery at another regulated facility (D1-D15 or R1-R13).	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
	Temporary storage of Lead Acid Batteries (hazardous waste)	Section 5.6 A(1) a) - in relation to the temporary storage or underground storage of hazardous waste with a capacity over 50 tonnes (R13).	Temporary storage of lead acid batteries pre/ post repackaging on-site (R13), in preparation for onward sale to another recovery operation (R04). Note: Includes Lead Acid Batteries arising from the sites ELV depollution operation and individually consigned loads from other treatment operators.	Existing activity regulated as a waste operation, however due to the implementation of IED into EPR the activity is now classified as a 'newly prescribed activity' and must be regulated as an installation.
	Temporary storage of Oils and other fluids (hazardous waste), from the depollution of ELVs	Section 5.6 A(1) a) - in relation to the temporary storage or underground storage of hazardous waste with a capacity over 50 tonnes (R13) - (aggregated with other hazardous waste storage activities on site)	Temporary storage of oils and other fluids on-site (R13), in preparation for onward sale to other recovery operations (R04).	The removal of hazardous components and materials from ELVs is a hazardous waste treatment process however, it is not considered to be a physico-chemical treatment under IED. The hazardous materials, including oils and other hazardous fluids stored on-site are aggregated with other hazardous waste storage activities and therefore classify as a 'newly prescribed activity' and must be regulated as an installation.

EUROPEAN OFFICES

AYLESBURY

T: +44 (0)1844 337380

BELFAST

belfast@slrconsulting.com

BIRMINGHAM

T: +44 (0)121 2895610

BONN

T: +49 (0)176 60374618

BRADFORD-ON-AVON

T: +44 (0)1225 309400

BRISTOL

T: +44 (0)117 9064280

CARDIFF

T: +44 (0)2920 491010

CHELMSFORD

T: +44 (0)1245 392170

DUBLIN

T: +353 (0)1 296 4667

EDINBURGH

T: +44 (0)131 335 6830

EXETER

T: +44 (0)1392 490152

FRANKFURT

frankfurt@slrconsulting.com

GRENOBLE

T: +33 (0)6 23 37 14 14

LEEDS

T: +44 (0)113 5120293

LONDON

T: +44 (0)203 8056418

MAIDSTONE

T: +44 (0)1622 609242

MANCHESTER

T: +44 (0)161 8727564

NEWCASTLE UPON TYNE

newcastle@slrconsulting.com

NOTTINGHAM

T: +44 (0)115 9647280

SHEFFIELD

T: +44 (0)114 2455153

SHREWSBURY

T: +44 (0)1743 239250

STIRLING

T: +44 (0)1786 239900

WORCESTER

T: +44 (0)1905 751310