

Guiguet-Doron, Geraldine

From: Hana Mainwaring <Hana.Mainwaring@environment-agency.gov.uk>
Sent: 02 June 2025 09:06
To: Guiguet-Doron, Geraldine
Cc: Richard Hadley
Subject: RE: EPR/XP3092NX/P001

Hi Gerladine,

Thank you for your email.
We will take a look at your queries and get back to you shortly.

Many thanks,

Hana Mainwaring *PER, FIEMA, CEnv, MSc*
Senior Permitting Officer



Mobile: 07867162124
Working: Monday, Tuesday, Wednesday & Friday (not Thursday)

General

From: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>
Sent: 23 May 2025 14:16
To: Hana Mainwaring <Hana.Mainwaring@environment-agency.gov.uk>
Cc: Tim Ross <tim.ross@environment-agency.gov.uk>; Pete Chesney <peter.chesney@environment-agency.gov.uk>; Richard Hadley <richard.hadley@environment-agency.gov.uk>
Subject: RE: EPR/XP3092NX/P001

Hana,

Thank you for providing the Enhanced pre app Email below.

I have reviewed this and I have the following questions:

1. During our pre app letter and subsequent call we mention that we would like to accept the following EWC codes for storage and transfer only.

16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
16 06 04	alkaline batteries (except 16 06 03)
16 06 06*	separately collected electrolyte from batteries and accumulators

I am wondering if this would trigger the need to apply for an additional activity/or a variation to the existing Transfer station activity. Could you please confirm and provide if necessary the additional fees/ Management plan required.

2. In your Response Email below you have stated the following

“Where the shredding of the Li-batteries is less than 75 tonnes per day then this activity would be classified as a directly associated activity to the Section 5.3 activity above, should this exceed 75 tonnes per day then the activity would become an installation activity.

If this is the case, then the activity would be:

Section 5.4 Part A(1)(b)(iv) treatment in shredders of metal waste - £12,357. This relates to the treatment of Hazardous waste shred following the shredding of the Li batteries.”

We do understand the principle of your statement however I am not quite sure we understand the aspect highlighted in yellow above. Is this a simple copy paste error? Otherwise can you please explain.

3. You have provided the Habitats screening report and I have the following questions:

- The screening report seems to have been provided for a waste operations. Would this differ if it was an Installation. If yes please provide new one and clarify the screening distance we should be using.
- The screening distance indicated on the first page is 1000m. However the radius on the map is clearly well above 1000m. The receptors listed on the subsequent pages are also including Habitats/Protected species above the 1000m Screening distance. Can you please clarify.

Many Thanks

Regards

Geraldine

Geraldine Guiguet-Doron
Environment Permit Manager
Recycling and recovery UK

Mobile: +44 7970 233842



SUEZ Recycling and Recovery UK Ltd
Packington House – Packington Lane – Little Packington - Meriden – CV7 7HN - United Kingdom
www.suez.co.uk





General

From: Hana Mainwaring <Hana.Mainwaring@environment-agency.gov.uk>

Sent: 16 May 2025 10:43

To: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>

Cc: Tim Ross <tim.ross@environment-agency.gov.uk>; Pete Chesney <peter.chesney@environment-agency.gov.uk>; Richard Hadley <richard.hadley@environment-agency.gov.uk>

Subject: EPR/XP3092NX/P001

EPR/XP3092NX/P001

SUEZ RECYCLING AND RECOVERY UK LTD

**Sidegate Lane Composting And Waste Transfer Facility, Sidegate Lane, Wellingborough, NN8 1RN
(EPR/XP3092NX/V004)**

Pre application – Enhanced service

I am pleased to provide you with your enhanced level of pre application advice for SUEZ RECYCLING AND RECOVERY UK LTD as requested.

To note, this information is to supplement the Lithium Battery Recycling Basic Pre-App Advice as previously provided. The advice has been provided within the number of hours agreed.

We can provide additional advice if required, subject to an additional charge.

We discussed the two proposals, Option A and Option B during our Teams call on 06/05/2025.

We discussed the two potential options, the installation and waste Environmental Permitting Regulations (EPR).

Application fees stated below are based on our discussions and reflect the anticipated effort required to determine a permit. When the application is submitted, it will undergo a validation check (duly making) to make sure the correct documents and fee have been submitted. The permitting officer carrying out this check is within their rights to deem that the level of application fee needs to be adjusted.

Please include this correspondence with the application.

As an outcome of the meeting, we agreed to provide further information in writing.

Application Fees and Timescales

Option A:

Waste permit, <75 tonnes per day, it would be considered a multi-activity variation, EA charging scheme 1.16.16 Metal recycling site – mixed metals: 100% of the baseline charge at £9,463, total base charge.

Timescale once validated: ~6 - ~12 months for waste.

However, should this exceed 75 tonnes per day then the activity would become an installation activity, refer below.

Option B: Installation permit, the appropriate Scheduled installation activities that should be applied for are:

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 - £16,001. This relates to the treatment of Hazardous waste shred following the shredding of the Li batteries.

Section 5.6 Part A(1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities listed in Sections 5.1, 5.2, 5.3 - £13,519. This relates to the storage of hazardous prior to treatment on-site.

Where the shredding of the Li-batteries is less than 75 tonnes per day then this activity would be classified as a directly associated activity to the Section 5.3 activity above, should this exceed 75 tonnes per day then the activity would become an installation activity.

If this is the case, then the activity would be:

Section 5.4 Part A(1)(b)(iv) treatment in shredders of metal waste - £12,357. This relates to the treatment of Hazardous waste shred following the shredding of the Li batteries.

This gives a total base charge of £41,877.

With regard to the addition of similar waste into the process following shredding stage I believe this would be fall under the 5.3 activity above and does not require a separate activity in the application.

Timescale once validated: ~6 months for installations.

Management Plans, Technical Description and BAT/AM Assessment

In addition to the above you will need to submit new or revised management plans for assessment since the activities are changing significantly on your site therefore the additional add-on charges will apply.

A Fire Prevention Plan (further guidance and links in basic pre-app) is required: £1,241.

A SSSI is within the bespoke screening distance (1 km, refer to the habitat screening report); habitats to be considered within the risk assessment and a fee of £779 is required for a habitats assessment.

Point source air emissions information, management, controls, risk assessment, any monitoring data from an equivalent site, and H1, parameters based on available guidance (BAT 8) with sight of the battery appropriate measures draft in consultation (further links in basic pre-app); however it is for the operator/applicant to apply for parameters with associated limits that are suitable for their proposed activity and WAC, supported by the H1.

Submit site layout (which shows all existing and any new emission points) plans to help us understand which activities will be undertaken on the areas of the site. You will also need to submit plant design drawings both for the new treatment proposed. The processes must also be represented through the submission of flow diagrams showing each of the process steps involved.

The applicant will need to provide a technical description of the techniques proposed, detailing any key plant, equipment and infrastructure, including design capacities and proposed throughput. The applicant must demonstrate how any relevant Best Available Techniques/Appropriate Measures will be met (refer to basic pre-app for further links and guidance). This should also include details of the operating techniques and the infrastructure proposed to minimise the risk of pollution, including any details of secondary containment (e.g. bunds) used and how this meets any relevant standards.

Please refer to the basic pre-app provided for other information to submit (application documents) such as NTS, EMS, variation forms etc. If sections are not applicable to the permit please indicate this rather than leaving a section blank. It is considered NIA/NMP, odour, dust and pest management plans are not required for the proposed activity at this location.

Relevant BAT and AM for the Proposal

As discussed at our meeting, there is no specific appropriate measures guidance published for the treatment or transfer of waste batteries. However, batteries are referred to in some of our existing appropriate measures guidance. For example, Section 4.4 of our appropriate measures guidance for treating metal waste in shredders treating metal waste in shredders provides some appropriate measures for the storage of batteries. 4

In addition to existing measures that refer to batteries, we would expect waste battery recycling facilities to be permitted and operated in line with other relevant standards (including emission limits) set out in our appropriate measures' guidance, specifically:

- Treating metal waste in shredders: appropriate measures for permitted facilities

Waste batteries contain metal and are usually treated for the primary purpose of recovering this metal. We would expect relevant standards set in this guidance to be met where batteries are stored or shredded.

- Appropriate measures for the transfer and treatment of WEEE

Although waste batteries are not a type of WEEE, they are common electrical components of WEEE, and we would expect measures for their treatment or transfer to be consistent with relevant standards set in this guidance. You are now proposing to accept vapes for treatment these will be classed as WEEE waste, therefore this guidance will need to be followed, in full, for the new wet processing line.

- Chemical waste: appropriate measures for permitted facilities.

Where the waste chemical components, materials or residues from waste batteries (for example, black mass, electrolyte) are stored or treated we would expect the relevant standards set in this guidance to be met.

It is worth having sight of the battery treatment appropriate measures in draft, we welcome your comments during the consultation period, hopefully within a month this document shall be issued to SUEZ.

Future Proofing

It is considered by the EA that the most suitable future proofing permit would likely be Option B due to changes in battery waste coding, i.e. from non-hazardous waste to hazardous waste for Li batteries. Option B would allow for treatment of hazardous waste batteries at the tonnage originally applied for. It would also allow for the acceptance and treatment of hazardous wastes from battery manufacturers.

If you have any questions, please let me know by 02/06/2025, in which by this date the enhanced pre-app will be closed.

Kind regards,

Hana Mainwaring *PER, FIEMA, CEnv, MSc*
Senior Permitting Officer



Mobile: 07867162124

Working: Monday, Tuesday, Wednesday & Friday (not Thursday)

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