recycling and recovery UK

Environment Agency
Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Dear Richard,

27th October 2025

Sidegate Lane Composting and Waste Transfer Facility,

Application number: EPR/XP3092NX/V005

Request for information dated 10 October 2025

Please find the enclosed SUEZ response to the request for information on the above application received via email dated 10 October 2025. EA request is repeated in bold text below.

1. **Firstly please provide written evidence which you believe fulfils the requirements, and demonstrates, that you meet the criteria of 'Legal Operator'. Following discussion recently I was informed that Lithium Battery Solutions (part of F & R Cawley) would be operating the site on behalf of yourselves.**

   Please provide details on how you (SUEZ Recycling and Recovery UK Ltd) can demonstrate you have:

   a) **Sufficient control of operations on site from the receipt of waste on site to the rejection of unacceptable wastes and the handling and removal of wastes for onward processing.**

   b) **Day -to-day control of the activities, including the manner and rate of operation. These details should include information about the contractual arrangements in place between Lithium Battery Solutions (part of F & R Cawley) and yourselves.**

   c) **Control over the maintenance, repair, and replacement of the proposed facilities and infrastructure and that any financial obligation for such work falls to SUEZ Recycling and Recovery UK Ltd.**

d) **All regulatory requirements for the regulated activities, including the 'open window composting' and 'transfer station' activities, in the proposed permit on site will fall under the remit of SUEZ Recycling and Recovery UK Ltd.**

F&R Cawley Limited (Cawleys) is now a fully owned subsidiary company of SUEZ Recycling and Recovery UK Ltd (SUEZ R&R). Lithium Battery Recycling Solutions was a department within Cawleys that was created prior to its sale to SUEZ, this department is now therefore now part of SUEZ. The purchase of Cawleys resulted in 3 additional permitted sites joining the SUEZ portfolio within our Industrial and Commercial Division, including the current battery recycling operation equipment at Luton TS. Cawleys has now been fully integrated into SUEZ R&R and are operating to SUEZ standards and procedures. The existing battery recycling equipment is being moved from our Luton facility to our Sidegate Lane facility where additional equipment for further stages of battery processing is currently being purchased and will be added to the existing plant that is owned by SUEZ following the purchase of Cawleys.

SUEZ R&R will be the legal operator for the activities undertaken at Sidegate Lane and will have full day to day control of the operation on the site from the receipt of waste on site to the rejection of unacceptable wastes and the handling and removal of wastes for onward processing. SUEZ R&R have full control over the maintenance and repair of equipment and infrastructures at the site. The financial obligation associated with any work at the site will be the responsibility of SUEZ R&R. As such, the regulatory requirements associated with all regulated activities on site including the open windrow composting and transfer station activities will be the responsibility of SUEZ R&R.

2. **The second aspect I have concerns over and are seeking clarification relates the full retention of both the 'open window composting' and 'transfer station' activities in the permit when the whole site has been changed to a battery treatment facility. None of the your current documents will effectively be correct in respect to these 2 activities. However, I think we can address this during the determination process if you are happy with this approach? This may include placing restrictions in the permit to prevent these activities operating while the battery treatment facility is operational or prohibit specific waste streams from being accepted.**

We are able to clarify that we are happy to have restrictions in the permit to prevent the open windrow composting to be operational while the battery treatment facility is operational. Please note that as the Transfer Station (TS) activity has been varied to allow acceptance of batteries of various chemistries (i.e. lead batteries, Ni-Cd batteries, mercury-containing batteries, alkaline batteries) and fluorescent tubes for storage and transfer only, we will be happy for the Environment Agency to restrict the TS activity to only accept the above waste streams and therefore prohibit other specific waste streams from being accepted under the TS activity. In addition, we will be happy to have an improvement condition requiring SUEZ to update all relevant environment management system documents prior recommencement of the open windrow compost activity and the acceptance of prohibited waste streams as part of the TS activity.

3. **With regard to the transfer station amendments (the addition of various battery types and fluorescent tubes, it is not clear where this operation will take place on the new proposed site layout. Provide details of storage locations, quantities being stored and how all transfer operations will meet the requirements of appropriate measures.**

   Details relating to the storage of batteries of different chemistries (i.e. lead batteries, Ni-Cd batteries, mercury-containing batteries, alkaline batteries) and fluorescent tubes are given in the waste storage plan located in Appendix B of the Operation and Emissions Management Plan (Document name 1.2 Operations and Emissions Management Plan June 2025). The document provides details relating to the storage of these materials including storage location, storage details, quantities and maximum storage time.

   In addition the location of these waste streams are included in the site layout plan (Document name Sgl-LITH-LAY-0625-01-A3-Site Layout Plan) submitted as part of the application.

   Batteries (i.e. lead , Ni-Cd , mercury-containing and alkaline batteries) are stored in battery containers within a 20ft ISO container. Fluorescent tubes will be stored in dedicated specialised containers. These waste streams are stored on impermeable surface draining to the sealed surface water lagoon. The storage and transfer operations of these waste types will therefore be in line with appropriate measures guidance.

4. **The final area of concern relates to the drainage on site and how this will be dealt with. I note that the site does have a discharge to soakaway as well as a lagoon to capture surface water from the certain parts of the site. Can you please clarify how you intend to differentiate between clean surface water and any potential process water produced on site. Should you be proposing to discharge anything other than**

clean surface water from the site, then a H1 for discharge to water will need to be submitted (together with the appropriate part of the application form - C6).

As indicated on the site layout drawing, waste types are stored in the northern area of the site and as specified in the waste storage plan (Appendix B of the Operation and Emissions Management Plan). Wastes are either stored in UN approved packaging or Flexible intermediate bulk containers (FIBC) within ISO containers, covered IBCs or specialised battery and fluorescent tube containers. Aluminium metal cases will be stored in a RoRo skip. Therefore all surface water from this area will be clean surface water which will drain to the sealed surface water lagoon.

The surface water run-off from the yard area located at the front of the building is from an impermeable surfaced area and is directed to the interceptor (9000 litres) through gullies and drains. This runoff is collected in a Class 1 full retention interceptor and cellular attenuation tank before discharging to soakaway. The system is equipped with a penstock valve to allow any contamination to be contained in the event of an incident. No wastes are stored in the yard area located at the front of the building and therefore only clean surface water will be discharged.

The quarantine area is located in this area. The quarantine area will be engineered as a bay enclosed on 3 sides by legio blocks and an engineered ramp at the front to prevent any liquid from escaping. The quarantine area will only be used in the event of emergency and in the event of a fire. Non-conforming and defective batteries arriving at the site will be stored in the quarantine area for assessment. Any batteries placed in quarantine area will be there for a minimal amount of time (hours) and will be placed either in the quench tank or in the electrochemical discharge area. Please note that the quench tank will also be located within the quarantine area and we have therefore amended the site layout drawing to reflect this change. We will ensure that while waste are stored in the quarantine area any liquids are retained within it. In the event of a fire the penstock valve will be shut and any contaminated fire water will be contained. Firewater draining to the interceptor will be taken away via tanker to a suitable disposal place. Fire water containment will be supplemented with the use of booms and drain matts where necessary.

We will be more than happy to discuss any of the above. We hope the response is satisfactory and look forward to hearing from you.

Yours sincerely,

Geraldine Guiguet-Doron

Environment Permit Manager

SUEZ Recycling and Recovery UK Ltd