

## Re: Refuels Limited: We Need More Information About Your Applications



Mike Taylor <mike@refuels.co.uk>

To  Katie Norton

Cc  Steven Bell



Follow up. Start by 28 November 2025. Due by 28 November 2025.

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Dear Katie

Please open the Word File "Dear Katie" for a full explanation of answers and attachments.

You will shortly be Cc'd on the payment email, when I can get our accounts to approve the payment!

Kind regards,

Mike Taylor

Director

Refuels Ltd



p: 0333 3239 555

m: 07494 904994

e: [mike@refuels.co.uk](mailto:mike@refuels.co.uk)

**From:** Katie Norton <[Katie.Norton@environment-agency.gov.uk](mailto:Katie.Norton@environment-agency.gov.uk)>

**Date:** Tuesday, 14 October 2025 at 14:11

**To:** Mike Taylor <[mike@refuels.co.uk](mailto:mike@refuels.co.uk)>

**Subject:** Refuels Limited: We Need More Information About Your Applications

Dear Mike,

**Environmental Permitting (England and Wales) Regulations 2016**

**Operator: Refuels Limited**

**Facilities: Refuels Ltd (multiple)**

Thank you for your applications received on 01/10/2024 and 03/10/2025. The following is to confirm our conversation of 13/10/2025.

We need to ask you for some missing information before we can do any more work on the following applications: EPR/UP3520LP/A001, EPR/UP3820LX/A001, EPR/TP3527LZ/A001, EPR/UP3620LS/A001, EPR/UP3120LV/A001, EPR/UP3720LM/A001, EPR/XP3320LQ/A001, EPR/XP3020LW/A001, EPR/XP3820LT/A001, EPR/XP3220LY/A001 and EPR/XP3620LU/A001

Please provide us with more information to the following:

1. **A revised copy of Form Part A including sections 5a, b, and c and details of the company directors including their dates of birth.**
2. **A revised copy of Form Part B4 confirming which technical standard, or alternative operating techniques you will be complying with, as requested in table 3a.**
3. **A copy of the Environmental Management System (EMS) for the site.**

*A summary of the EMS is outlined in the submitted Process Audit Report, but a separate EMS summary has not been provided.*

4. **Confirm your procedures that are in place for assessing and training the customers who will be using and maintaining the site (i.e. do you require them to have completed the SPA vehicle mis-fuellers course, DSEAR (Dangerous Substances and Explosive Atmospheres Regulations) course, are they inducted/trained in waste acceptance, spillage response for the site.) In addition to the procedures as outlined within the submitted document titles 'Refuels Ltd – Decanting Procedures & Emergency Actions V9' this references European Agreement Concerning the Carriage of Dangerous Goods By Road (ADR 2023), The Carriage of Dangerous Goods by Road Regulations 2009, DSEAR Dangerous Substances & Explosive Atmospheres Regulations 2002. This document does not confirm any competency requirements and training provided for the operatives using the site.**
5. **The site is identified as an unmanned site, operated by the customers directly, and remotely managed by Refuels Ltd for data collection and monitoring. Please clarify**

**how the site will be remotely managed. As the permit holder you should be in day-to-day control of site operations, confirm how this will be achieved.**

### **Site-specific requests**

For each site, please provide us with more information to the following:

- 6. A revised copy of Form Part B2 including evidence of technical competence as requested in section 3b.**

*Identify the individuals who will be providing technical competency cover for the site. As you are using a Competence Management System under the ESA/EU Skills scheme, you must provide formal confirmation of this coverage and any supporting evidence.*

- 7. A revised copy of Form Part B2 including details of any insolvency proceedings that have occurred for any companies that the current directors for Refuel Limited were active directors of, at the time that those companies became insolvent, as requested in section 3c.**

*This is outlined in the [Part B2 form guidance](#).*

- 8. A site-specific environmental risk assessment that considers receptors both residential and habitats, addressing emissions including odour and VOCs, spills and potential escape to groundwater and surface water, and fire.**

*The current information provided mainly addresses risk to onsite personnel from a health and safety perspective. As part of our screening process, we have identified several protected habitats that you will need to specifically address and include in your risk assessment. Please see our online guidance at [Risk assessments for your environmental permit - GOV.UK](#) and, as an example, the risk assessment for [SR2012 No 15: storage of electrical insulating oils - GOV.UK](#).*

- 9. A site location plan identifying the location of the site in relation to sensitive receptors and outlining any external drainage (specifically surface water drainage) in close proximity/down flow gradient to the permitted area that can potentially be impacted on from loss of fuels from the permitted site.**

*Requested to support the Risk Assessment for the site and incident response.*

**10. An updated site plan which includes the following:**

- **A date and reference number**
- **The site address and NGR**
- **A scale**
- **A boundary that is clearly outlined in green**
- **A north arrow**
- **Local features (such as nearby road names)**

*For more information, see section 5 of our guidance for form part B2: [Form guidance EPB: Application for an environmental permit – Part B2 general – New bespoke permit](#)*

**11. A site-specific Site Condition Report (SCR) this should follow the format as outlined in [Environmental permitting: H5 Site condition report - GOV.UK](#)**

*Note that, following review of the individual site condition report, we will provide an update and advice on any additional content that the site condition report should ideally contain to support future surrender of the site.*

Please note that only one copy of the documents requested under the non-site-specific items (1-5) is required, whereas application-specific responses will be required for sections 6-11.

You must send us the information by 10/12/2025.

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

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

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

If we do have to return your applications, we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,613. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits->

[and-abstraction-licences-tables-of-charges](#)

Please reply directly to this email with your information.

Without this additional information we will be unable to issue your permit.

Note: Our email system has a file size limit of 25MB, if your returns 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 07350409342 or email [Katie.Norton@environment-agency.gov.uk](mailto:Katie.Norton@environment-agency.gov.uk).

Yours sincerely,

Katie Norton

Katie Norton

Graduate Permitting Officer – Waste

Permitting | National Regulation & Monitoring (NRM) | Environment Agency

Horizon House, Deanery Road, Bristol, BS1 5AH

\* [Katie.norton@environment-agency.gov.uk](mailto:Katie.norton@environment-agency.gov.uk)

8 Working days: Mon-Fri

**Help us to improve our service and complete our customer survey – click [Permitting Survey](#).**



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any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.