

Hugill, Connor

From: Guignet-Doron, Geraldine <geraldine.guignet-doron@suez.com>
Sent: 29 March 2021 14:12
To: Irons, Sue
Subject: RE: One point to clarify please - Variation application (Bodmin Material Recycling Facility) Ref: EA/EPR/HP3396ER/V003 - EAWML 101680

Sue,

I can confirm that the site will not undertake intentionally any pre-treatment for incineration under R3 or R5.

Regards

Geraldine

Geraldine Guignet-Doron
Environment Permit Manager
Recycling and recovery UK

Tel: +44 1675 434731
Mobile: +44 7970 233842
Fax: +44 1675 465740



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



COVID-19

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Correspondence

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From: Irons, Sue <susan.irons@environment-agency.gov.uk>
Sent: 29 March 2021 13:07
To: Guiguet-Doron, Geraldine <geraldine.guiguet-doron@suez.com>
Subject: One point to clarify please - Variation application (Bodmin Material Recycling Facility) Ref: EA/EPR/HP3396ER/V003 - EAWML 101680

Hello Geraldine,

Thank you for your reply that came in 26/3/21. I have just finished looking at it.

I know we spoke on the phone about treatment limits relevant to Waste versus Installation permits. Would you mind confirming in writing whether this site will do any intentional 'pre-treatment for incineration' under R3 or R5? e.g. of pre-treatment are in Note 5.4.5 page 57+ of RGN 2
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964487/LIT_6529.pdf .

Regards,

Sue Irons
Permitting Officer (Waste), National Permitting Service - Birmingham hub
Environment Agency



susan.irons@environment-agency.gov.uk
Work mobile :07867 328061
Ext. number: 02030252898
Int. number: 32898
Website: www.gov.uk/environment-agency

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My flood incident role is: Incident Support Officer

From: Guiguet-Doron, Geraldine [<mailto:geraldine.guiguet-doron@suez.com>]
Sent: 26 March 2021 14:56
To: Irons, Sue <susan.irons@environment-agency.gov.uk>
Cc: PSC Land <PSC@environment-agency.gov.uk>
Subject: RE: Not Duly Made due close of 29 March 2020 - Variation application (Bodmin Material Recycling Facility) Ref: EA/EPR/HP3396ER/V003 - EAWML 101680

Sue,

Please find attached below in Red our response to the Non Duly Made Email. This Email will be followed by another Email from our other platform (Coursier) from which we can send Large File and all documents will be sent via this platform.

- Form Part A Q5C: Submit list of SUEZ Recycling and Recovery UK Ltd Directors.

Reason: We were only able to find the Regional Director's name information in 'EP5 - Director Details and Operator ability.' We expect the list of names to match those on Companies House, unless you are able to justify by explaining the differences.

We have amended our document EP5 – Operator Ability. This now list all SUEZ Recycling and Recovery UK Ltd Directors. We have included 2 versions one is password protected with the password that has already been communicated to the EA and the other version has been edited to remove sensitive information so it can be included in the Public Register.

- Clarify whether the site wishes to accept hazardous wastes, or if it is an incidentally accepted waste that would be quarantined. Please amend accordingly FPP, EMS, ERA, SMP, Form Part C4 Table 1a to confirm waste types to be accepted at site.

Reason: There are inconsistencies whether or not hazardous wastes will be allowed. e.g. 2.5.12 Hazardous wastes are not permitted at the site.", whereas waste types lists hazardous WEEE.

We have confirmed that we do not intend to accept any Hazardous Wastes. Therefore the relevant Management plans have been amended and are submitted as part of this reply.

This include the Site management Plan and the Odour Management Plan. The Fire Management Plan do not need any amendment.

- Update Form C4 Table 1a to state maximum daily treatment tonnage for R4 (metals).

Reason: Your current Standard Rules set allows shredding (but does not specify waste types to shred). We believe you may intend to shred metals for reasons other than to improve payload; if this exceeds a specific threshold we would class it as an Installation not a Waste Operation.

We can confirm that we do not intend to undertake any shredding of metals. We have amended the Form C4 which is included as part of this submission.

- Update your Environmental Risk Assessment to include assessment of likely risk from flooding.

Reason: All new storage areas should be assessed for likely risk from flooding.

The Risk Assessment has been amended to include assessment of Flooding.

I trust this is satisfactory. Please do not hesitate to contact me if you have any further queries.

Many Thanks

Regards

Geraldine

Geraldine Guiguet-Doron
Environment Permit Manager
Recycling and recovery UK

Tel: +44 1675 434731

Mobile: +44 7970 233842

Fax: +44 1675 465740



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From: Irons, Sue <susan.irons@environment-agency.gov.uk>

Sent: 15 March 2021 16:36

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

Cc: PSC Land <PSC@environment-agency.gov.uk>

Subject: Not Duly Made due close of 29 March 2020 - Variation application (Bodmin Material Recycling Facility) Ref: EA/EPR/HP3396ER/V003 - EAWML 101680

Dear Geraldine,

We need more information about your application

Thank you for your application received on 21/1/21. The following is to confirm our conversation of 15/3/21.

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

- Form Part A Q5C: Submit list of SUEZ Recycling and Recovery UK Ltd Directors.

Reason: We were only able to find the Regional Director's name information in 'EP5 - Director Details and Operator ability.' We expect the list of names to match those on Companies House, unless you are able to justify by explaining the differences.

- Clarify whether the site wishes to accept hazardous wastes, or if it is an incidentally accepted waste that would be quarantined. Please amend accordingly FPP, EMS, ERA, SMP, Form Part C4 Table 1a to confirm waste types to be accepted at site.

Reason: There are inconsistencies whether or not hazardous wastes will be allowed. e.g. 2.5.12 Hazardous wastes are not permitted at the site.”, whereas waste types lists hazardous WEEE.

- Update Form C4 Table 1a to state maximum daily treatment tonnage for R4 (metals).

Reason: Your current Standard Rules set allows shredding (but does not specify waste types to shred). We believe you may intend to shred metals for reasons other than to improve payload; if this exceeds a specific threshold we would class it as an Installation not a Waste Operation.

- Update your Environmental Risk Assessment to include assessment of likely risk from flooding.

Reason: All new storage areas should be assessed for likely risk from flooding.

We will need to place the supporting documents and application forms on the Public Register; therefore please could you remove the password protection from EP5 document but let us know which pages contain sensitive information e.g. Dates of Birth of Directors or TCM, so we can redact them (blank them out). We would keep an un-redacted version on our system for internal viewing only.

Please send the information, quoting the above application reference, to me or psc@environment-agency.gov.uk or:

Permitting and Support Centre (P&SC)

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Please send the information within 10 working days of this letter. If we do not receive the information within 10 working days we will return your application.

If we do receive the requested information within 10 working days, we'll 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 letter 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 and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

If you have any questions please phone or email me.

Regards,

Sue Irons
Permitting Officer (Waste), National Permitting Service - Birmingham hub
Environment Agency



susan.irons@environment-agency.gov.uk

Work mobile :07867 328061

Ext. number: 02030252898

Int. number: 32898

Website: www.gov.uk/environment-agency

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