

From: [Andrew Lake](#)
To: [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [Simone Cumberbatch](#); [Gary Schwandt](#)
Subject: RE: EPR/TP3602SH/V004 We Need More Information About Your Application CRM:0889130
Date: 06 May 2026 10:26:29
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.jpg](#)
[image006.png](#)
[WhatsApp Image 2026-04-24 at 15.44.20.jpeg](#)
[WhatsApp Image 2026-04-24 at 15.44.20 \(1\).jpeg](#)

Simone

I hope you will please find responses to questions below and revised document at link below.



- 1. Provide an updated statement confirming whether the permit holder have any relevant convictions to declare, and update Part C2 section 3a.**

The application was received on 24/02/2026. New convictions information arose after submission and must be reflected before validation can be completed. [See amended document at link.](#)

- 2. Confirm whether batteries and accumulators are accepted on site or just a by-product.**

Documents refer to batteries, but no battery waste codes are currently included. Confirm whether batteries or battery-containing components are accepted. [Batteries are not accepted.](#)

- 3. Provide confirmation of whether any surface water comes into contact with waste, waste storage areas or treatment areas, including during rainfall.**

- If yes, describe how this water is contained, managed and disposed of.**

The drainage plan shows surface water and foul drainage, but the emissions tables state no discharges. If any rainfall or surface water does come into contact with waste and is discharged through the point source, provide a H1 tool with emissions to water. The H1 must assess emissions to water and reflect the proposed drainage and discharge arrangements and follow our guidance. [Surface water pollution risk assessment for your environmental permit - GOV.UK](#) Waste will be stored beneath Zapp shelters, secured in bags placed on pallets. Additional plastic sheeting will be installed over the bags to provide further protection from weather and external contamination. Waste stored in this manner will be held either under external cover or within the internal storage areas of the facility. As waste is stored off the ground, under cover, and fully contained with no direct pathway to surface water, there is no credible risk of pollution to surface water receptors and therefore no H1 surface water risk assessment is required. See attached images.

4. **Provide a H1 Risk Assessments for emission point EMP1**

Under Environment Agency guidance, any point source emission to air must be risk assessed using H1 unless the operator can clearly justify that emissions are insignificant, and no assessment is required. Where an emission point is identified but emission rates, contaminants, and dispersion impacts are not fully quantified, H1 is the standard method used to assess the risk to human health and the environment and to demonstrate compliance with environmental standards .[Air emissions risk assessment for your environmental permit - GOV.UK](#) The dust extraction system is fully internal, with no external emission or discharge points. Dust is captured through a sealed extraction system and collected directly into enclosed barrels. These barrels are inspected regularly and emptied on at least a weekly basis, or sooner if required, to ensure continued effective operation. The system is self-contained with no pathway to surface water, groundwater, or other environmental receptors. As there are no emissions to air or water and no credible pollution pathway, an H1 environmental risk assessment is not required.

5. **Provide details confirming the inspection frequency, maintenance frequency, and media or filter change frequency for all emission control equipment described.**

Maintenance arrangements for emission control equipment such as but not limited to interceptor and Local exhaust ventilation (LEV) must be clear at validation to demonstrate effective control of emissions under normal and foreseeable operating conditions. [This is contained within 027.1_05_004 EMS_Op Ins V2.](#)

6. **Provide the maximum quantity of hazardous and non-hazardous waste individually stored on site at any one time in tonnes.**

[Haz Storage: 313](#)

[Non-Haz Storage: 549](#)

7. **Provide the daily waste treatment capacity (tonnes per day) for each activity.**

Confirmation of daily treatment capacity and maximum waste storage quantities is required at validation to define the scale of activities. [Up to 85 tones per 24 hours.](#)

8. **Submit up to date evidence of technical competence for the nominated technically competent manager (CIWM/WAMITAB), including a current continuing competence certificate.**

The technical competence evidence supplied with the application has expired. For variations there is no grace period, and we cannot complete validation until current evidence is provided. [See link above.](#)

9. **Submit a flood pollution risk assessment (or equivalent accident/flood assessment) covering flood scenarios relevant to Flood Zone 2. The assessment must:**

identify sources, pathways and receptors during a flood event, assess the risk of pollution where waste is stored outside, and describe control measures and emergency actions that prevent pollution during flooding.

Confirmation of flood risk consideration is required at validation to demonstrate that environmental risks have been appropriately identified and addressed. [This is contained within 027.1_05_011 FPRA V1](#)

Andrew Lake BSc (Hons), MCIWM
Managing Director
9 Goldington Road, Bedford, Bedfordshire, England, MK40 3JY
Mob:07498 671713

www.umbrella-environmental.co.uk

Umbrella Environmental is pleased to support Alzheimer's Research UK. As a family business, it feels important to align ourselves with a cause that has affected the people closest to us. If you wish to donate please [click here](#)



From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: 23 April 2026 09:42
To: Andrew Lake <andrew@UmbrellaEnvironmental.co.uk>
Cc: Simone Cumberbatch <Simone.Cumberbatch@environment-agency.gov.uk>
Subject: EPR/TP3602SH/V004 We Need More Information About Your Application CRM:0889130

Dear Andrew Lake,

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/TP3602SH/V004

Operator: 3R TECHNOLOGY UK LIMITED

**Facility: 3R Technology UK Limited EPR/TP3602SH/A001, Roman Way,
Preston, PR2 5BB**

Thank you for your application received on 24/02/2026. The following is to confirm our conversation of 16/04/2026.

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

1. **Provide an updated statement confirming whether the permit holder have any relevant convictions to declare, and update Part C2 section 3a.**

The application was received on 24/02/2026. New convictions information arose after submission and must be reflected before validation can be completed.

2. **Confirm whether batteries and accumulators are accepted on site or just a by-product.**

Documents refer to batteries, but no battery waste codes are currently included. Confirm whether batteries or battery-containing components are accepted.

3. **Provide confirmation of whether any surface water comes into contact with waste, waste storage areas or treatment areas, including during rainfall.**

- **If yes, describe how this water is contained, managed and disposed of.**

The drainage plan shows surface water and foul drainage, but the emissions tables state no discharges. If any rainfall or surface water does come into contact with waste and is discharged through the point source, provide a H1 tool with emissions to water. The H1 must assess emissions to water and reflect the proposed drainage and discharge arrangements and follow our guidance. [Surface water pollution risk assessment for your environmental permit - GOV.UK](#)

4. **Provide a H1 Risk Assessments for emission point EMP1**

Under Environment Agency guidance, any point source emission to air must be risk assessed using H1 unless the operator can clearly justify that emissions are insignificant, and no assessment is required. Where an emission point is identified but emission rates, contaminants, and dispersion impacts are not fully quantified, H1 is the standard method used to assess the risk to human health and the environment and to demonstrate compliance with environmental standards. [Air emissions risk assessment for your environmental permit - GOV.UK](#)

5. **Provide details confirming the inspection frequency, maintenance frequency, and media or filter change frequency for all emission control equipment described.**

Maintenance arrangements for emission control equipment such as but not limited to interceptor and Local exhaust ventilation (LEV) must be clear at validation to demonstrate effective control of emissions under normal and foreseeable operating conditions.

6. **Provide the maximum quantity of hazardous and non-hazardous waste**

individually stored on site at any one time in tonnes.

7. Provide the daily waste treatment capacity (tonnes per day) for each activity.

Confirmation of daily treatment capacity and maximum waste storage quantities is required at validation to define the scale of activities.

8. Submit up to date evidence of technical competence for the nominated technically competent manager (CIWM/WAMITAB), including a current continuing competence certificate.

The technical competence evidence supplied with the application has expired. For variations there is no grace period, and we cannot complete validation until current evidence is provided.

9. Submit a flood pollution risk assessment (or equivalent accident/flood assessment) covering flood scenarios relevant to Flood Zone 2. The assessment must:

identify sources, pathways and receptors during a flood event, assess the risk of pollution where waste is stored outside, and describe control measures and emergency actions that prevent pollution during flooding.

Confirmation of flood risk consideration is required at validation to demonstrate that environmental risks have been appropriately identified and addressed.

Please reply directly to this email with your information and copy in Simone.Cumberbatch@environment-agency.gov.uk

Postal address:
Integrated Permitting Services
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

You must send us the information by **06/05/2026**.

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

If we receive what is missing by the deadline, we will 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 email 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 correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

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 07391409419 or email Simone.Cumberbatch@environment-agency.gov.uk

Yours sincerely,
Simone Cumberbatch

Working days: Tuesday to Friday

Upcoming Leave: *4th May - 8th May.*

Please consider this a "thanks" in advance.

Every email has a carbon footprint. So if you don't hear back from me, it's not because of you, it's because of the planet.

Department for Environment, Food and Rural Affairs (Defra) This email and any attachments is intended for the named recipient only. If you have received it in error you have no authority to use, disclose, store or copy any of its contents and you should destroy it and inform the sender. Whilst this email and associated attachments will have been checked for known viruses whilst within Defra systems we can accept no responsibility once it has left our systems. Communications on Defra's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.