

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Lesley Kay Foss, Company Secretary

Britaniacrest Recycling Limited
26 Reigate Road
Hookwood
Horley
Surrey
RH6 0HJ

Application number: **EPR/CB3308T/V002**

Copy to Chris Foss and Keith Riley: cfoss@britaniacrestrecycling.co.uk and k9riley@aol.com.

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 08/04/2021.

Send the information to either the email or postal address below by 30/03/2022. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: psc@environment-agency.gov.uk.

Postal address:
Permitting and Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
Principal Permitting Officer	16/02/2022

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

Please provide further information in response to the questions below:

Abatement

- 1) Confirm whether the configuration of the dosing of activated carbon and acid gas reagent is single or combined feed and provide a justification for the proposal.

Monitoring

- 2) Confirm whether a backup CEMS system will be installed. If this is not the case, please provide information about the mechanisms that would be proposed to ensure that the backup limits for particulates, carbon monoxide and Total Organic Carbon are not exceeded.

Fire Prevention Plan

Please update the Fire Prevention Plan to reflect the following points:

- 3) There are two areas vulnerable to fire in bunkered storage arrangements, satisfactory solutions to cleaning these areas on a regular basis should be provided:
 - a) corners of the bunker; and
 - b) the base of the bunker.

Section 5.3.1 of the FPP states that mixing the waste with the crane enables waste from the base of the bunker to be brought to the surface. However, there is normally a buffer at the base of the bunker, which prevents the grabs from coming into contact with the floor of the bunker causing damage. This area is likely to contain waste that has been stored for in excess of the recommended time duration.

- 4) The maximum pile width and length within the Fire Prevention Plan needs to be specified in line with section 9.1 of the FPP web guidance for waste stored on site other than that stored within the bunker.

You must consider the 'Fire Prevention Plans: environmental permits' guidance (updated 11/01/2021) on [GOV.UK](https://www.gov.uk).

The FPP guidance states that for all waste piles, the maximum length or width allowed (whichever is longest) is 20 meters. The table in section 9.1 outlines the maximum volumes for each type of waste. If your waste piles contain a mixture of combustible wastes, you should work out the maximum limits based on the type of waste that makes up most of a mixed pile.

Surface water emissions

- 5) Please update the surface water plan to show the proposed location of the interceptor, discharge point and attenuation pond for surface water collection.

The supporting document specifies that emissions of uncontaminated surface water run off will be discharged via an interceptor and attenuation pond. However, the drainage plan does not show the location of this discharge point, the interceptor or the attenuation pond. These features will also need to be within the permit boundary.

Energy efficiency

R1 assessment

- 6) Provide additional information on why the data included in the R1 assessment for primary and secondary air use is appropriate.

The combined total air is significantly less than the values included for other R1 applications for sites with a similar technology proposed. Please justify where the figures come from and why they are considered appropriate for the R1 assessment.

Energy efficiency Article 14 Assessment

- 7) Please update the Article 14 assessment to address the following points:
 - a. The search radius for potential heat users should be updated to 15km unless there is adequate justification as to why 10km is applicable rather than 15km as per table 5 in the Article 14 guidance.
 - b. The Primary Energy Savings (PES) are greater than 10% and therefore a Cost Benefit Analysis should be carried out.

The land North of Horsham was identified as a potential heat user and therefore a Cost Benefit Analysis (CBA) should be carried out. The calculated PES is greater than 10% the scheme is classed as high efficiency co-generation so the operator has to do a CBA.

Waste storage

- 8) Please confirm the maximum volume of asbestos waste that will be stored on the site at any one time.