

**From:** [Alice Merry](#)  
**To:** [Braysher, Caroline](#)  
**Cc:** [James Sturman](#); [Nicola Barnes](#); [Joanna Holland](#); [Dean Thurgood](#)  
**Subject:** RE: EPR/BB3239RD/V006 - Blue Phoenix - Tilbury Docks - Not Duly Made  
**Date:** 18 October 2024 18:02:02  
**Attachments:** [image008.png](#)  
[image009.jpg](#)  
[image010.png](#)  
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[image013.png](#)  
[image014.png](#)  
[image015.png](#)

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Reference: 3886-0310-0026

Hi Caroline,

On behalf of Blue Phoenix Limited, please find below a link to the requested further information:

[Additional Info for DM](#)

I have granted you access but let me know if you run into any problems.

We trust that the above is acceptable to you. Please feel free to contact me if you have any questions or queries regarding the above.

Kind regards,

Alice Merry  
Environmental Scientist



Kingsgate House  
Wellington Road North  
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**From:** Braysher, Caroline [REDACTED]  
**Sent:** Thursday, October 3, 2024 3:19 PM  
**To:** James Sturman [REDACTED]  
**Subject:** EPR/BB3239RD/V006 - Blue Phoenix - Tilbury Docks - Not Duly Made

Reference: 3886-0310-0024

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Dear Mr Sturman,

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

**Application reference: EPR/BB3239RD/V006**

**Operator: BLUE PHOENIX LIMITED**

**Facility: Tilbury IBA Facility, Tilbury, RM18 7EH**

Thank you for your application received on 05/08/2024. Thank you for taking the time to speak with me about this.

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

1. Form C3, Section 3a – Add the non-hazardous waste appropriate measures to the Operating Techniques you will adhere to.
2. Appropriate Measures – provide an assessment of how you will meet the Non-Hazardous Waste Appropriate Measures described in [Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](#) . Include more details about how incoming wastes are kept separate from those being processed pending results of testing, waste pre acceptance procedures, etc...
3. BAT Assessment – describe how you monitor moisture levels of the IBA at different stages and confirm optimum moisture levels you adhere to. This to also be replicated in an amended Dust Management Plan for completeness.
4. Site layout – provide a plan to scale showing the site layout, to include all pre-and post treatment storage areas, site surface type and tipping area. I believe that the new area of the site is at a different level to the existing area so changes to things like drainage, containment, etc... should also be shown.
5. Current tipping area – I have been made aware that there are concerns about the structural integrity of the site's existing tipping area. This will be relevant if the site will continue to use it as part of this variation. If so, provide details about how the operator will manage this issue, how it will be resolved, timescales, etc...
6. New lagoons – provide confirmation that new lagoons will meet the CIRIA736 standard. This is all we need if they haven't been built yet. There will be an IC going into the permit asking for a report by an appropriately qualified engineer to confirm that the structure does indeed meet CIRIA, however this can only happen AFTER its construction.
7. Confirm ventilation arrangements for the new treatment building.
8. Water management – you have said that water held in the lagoons may occasionally be discharged to sewer when it can't be used. As lagoon water contains leachate from the IBA piles, and given the increase in tonnages, please provide a new H1 assessment which demonstrates the discharge does not require modelling and you can meet the relevant limits.

9. Dust management plan – provide:

- a. Confirmation of the maximum pile sizes and dimensions (including tipping pile).

Please reply directly to this email with your information.

Regarding pre-application advice discussions over the lagoon design – I can't see anything saved under this permit ref number, although one of the officers I need to speak with is currently out of the office. However, it doesn't change my request for confirmation that the new water storage arrangements will meet CIRIA when construction has finished. This is all I need for this as part of the variation – I don't require sight of the design proposal.

You must send us the information by 18/10/2024. 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 application charge to cover our costs in reviewing your application. 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-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.

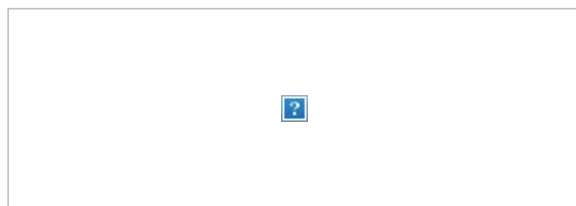
If you have any questions contact me using the details below.

Yours sincerely,

**Caroline Braysher**

Senior Permitting Officer – Installations, Medium Combustion Plant Team, National Permitting Service

  
Environment Agency | Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF



**Do you operate a medium combustion plant or specified generator?**  
[Click here to find out if you need to meet the regulations](#)

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