**Application reference: EPR/RP3027SK/A001**

**Operator: GAP GROUP LIMITED**

**Facility: GAP Group Limited Oxford, Dock Road, Thurrock, RM18 7EQ**

1. Form Part A question 5c – Provide an updated list of the current directors and their details.

✓ - A – Updated document GGL 1

1. Form Part B2 question 2a– confirm the site name and National Grid Reference as document GGL1 contains a different site name and NGR.

✓ - A – Updated Form Part B2

Form Part B2 question 3 – Provide evidence that Luke Pickstone or Matthew Commons are registered on the appropriate CIWM/WAMITAB course.

✓ - A – Modules provided on document titled HROC 6, this award should be completed within the next month

1. Form Part B2 question 3b – Clarify all the sites that the TCM will be providing cover for. We are aware that the same TCM’s have been provided to cover multiple GAP Group Limited sites currently being applied for.

✓ - A – Luke Pickstone will be travelling to all sites weekly as part of his role. Also, the sites are only operational for very small periods of time. Only accepting one or two loads per day with discharge taking a maximum of 15 minutes.

1. Form Part B2 question 4a- confirm the sewerage undertaker you discharge to as you have provided a copy of a sewer discharge consent from Anglian Water.

✓ - A – Updated

1. Form Part B2 question 5a – clarify and provide a plan(s) which clearly and consistently show the permitted area being applied for and the layout of storage and treatment tanks, containers storing screened wastes , drainage and discharge point(s) to sewer (both underground chambers and the discharge into the sewer).

✓ - A – As discussed on the phone yesterday the final sample point (samples are also taken from the final point of the Dexter Watson system) sits on a part of the site shared by other arms of the GAP Group and as a result the whole permitted area will not be controlled by the tankering operation.

1. Form Part B2 question 5b – Confirm or otherwise update the Site Condition Report (SCR) to ensure that it provides the relevant information regarding the actual site location.

✓ - A – No need to amend as correct.

Please note the operation is considered a medium risk award involving treatment, and we consider the most appropriate award to be CIWM (WAMITAB) Level 4 Medium Risk Operator Competence for Non-hazardous waste treatment and transfer (601/8528/4) (MROC1).

The following documents show different areas to be permitted and/or don’t include all the storage tanks in the area. GGL11, GAP GROUP Proposed Permitted Area Tilbury and Proposed Permitted Area.

We have clarified our position regarding the discharge point. We consider that the discharge point should be where it ‘leaves your control’, whether this be at the permit boundary or elsewhere.

We recommend that the permit boundary for this application be extended to include the manhole where both the sewer pipes connect from the direct discharge and the Dexter Watson prior to leaving the site. (We can discuss this further on Wednesday)

1. 8. Form Part B2 question 5c – Provide an updated Non-Technical Summary (NTS) which clarifies there will be no use of flocculant within the direct discharge, storage or Dexter Watson container. Also provide clarity on when and which wastes will be discharges directly, stored in the tuff tanks or treated.

✓ - A – Amened GGL 2

1. Form Part B2 question 6 – Provide an updated Environmental Risk Assessment in line with our guidance [Risk assessments for your environmental permit - GOV.UK](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit) which is based on the correct site location, includes a receptor plan and includes secondary containment for all liquid waste and consideration for the treatment of this waste and going to sewer.

This must be based on the correct location of the site and to follow

1. Form Part B2 question 6 – Provide a Site Specific Bioaerosol Risk Assessment (SSBRA). This is because the site is treating biological wastes within 250m of sensitive receptors.

A SSBRA must satisfy us that the process and/or abatement measures available adequately prevent, or where this is not possible, significantly reduce the risk of bioaerosol release and that the resulting activity will be unlikely to expose the nearest sensitive receptor to elevated concentrations of bioaerosols. The detail and level of risk assessment must be site specific, process and location dependant. To control and minimise the risks identified, measures and process controls must be in place and clearly stated.

Please see here [Bioaerosol monitoring at regulated facilities: RPS 209 - GOV.UK](https://www.gov.uk/government/publications/bioaerosol-monitoring-at-regulated-facilities-use-of-m9-rps-209/bioaerosol-monitoring-at-regulated-facilities-use-of-m9-rps-209) for further information.

✓ - A – Please see Bioaerosol Risk Assessment document

1. Form Part B4 table 1a – Updated Table 1a for the R and D codes. We consider D9, D13 and D15 be most appropriate.

✓ - A – Amended Form

1. Form Part B4 table 1a – clarify if there will be any storage on site, as you have stated there is a discharge consent and specific discharge limits, will this mean that a tank(s) will retain wastes for a period of time. The table states maximum storage will be 100 tonnes but your NTS mentions ‘the site will have tanks capable of storing 50 tonnes on site’  and that you will treat and discharge a maximum of 50 tonnes per day.

✓ - A – Amened the NTS to clarify the above that up to 100 tonnes can be stored, but its controlled release will not exceed 50 tonnes per day.

1. Form Part B4 table 1b – confirm the waste codes that will be accepted on site. The Odour Management Plan includes 20 03 99 which is not included within the NTS. If this waste code is being accepted we will require a suitable restriction to the code and your reasoning as to why this code is the most appropriate, ensuring there is no other more suitable EWC code.

✓ - A – Amened the NTS to clarify

1. Form Part B4 Table 2 – Provide the grid reference of the discharge point to sewer.

✓ - A – Amended Form

1. Form Part B4 table 3a – Confirm which appropriate measures you are applying to your operations, only the sections have been included in the table. We would expect the relevant parts of [Non-hazardous and inert waste: appropriate measures for permitted facilities](https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities) and [Biological waste treatment: appropriate measures for permitted facilities](https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-for-permitted-facilities) to be applied.

✓ - A – See Appropriate Measures document

1. Form Part B4 table 3a - Provide an updated Odour Management Plan (OMP) in line with our guidance [Environmental permitting: H4 odour management - GOV.UK](https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management), which include the following;

* 1. How the treatment tank(s) will be emptied and cleaned,
	2. That the treatment and storage tanks emptying will be an odour source,
	3. That the storage of treated solids or those removed from the initial screening will be an odour source,

Explained in cleansing process that

* 1. The storage times of all wastes,
	2. Clarification of the site operating hours,
	3. Clarification of odour triggers e.g. odour at 3 or above as referenced in section 3.1,
	4. Steps taken in the event monitoring identifies odours,
	5. Confirmation of operational hours,
1. Provide the Waste Acceptance Criteria for the site, clarifying how you ensure that 16 10 02 in particular will not be hazardous.

✓ - A – Amened NTS