

From: [REDACTED]
To: [Pearson, Charlotte](#)
Cc: ["Chris Edwards"](#)
Subject: RE: EPR/BT2866IG/V004 Grundon Waste Management Ltd - Not Duly Made
Date: 15 February 2023 15:41:36
Attachments: [image007.png](#)
[image008.gif](#)
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[image013.png](#)
[CWI List of Waste .docx](#)

Hi Charlotte,

Further to your email below, please find our response and the attached supporting information.

1. **EMS**

We can confirm that the EMS will indeed meet the EA requirements. The EMS Summary provided in Appendix D of the variation application sets out how, specifically Section 3 "Permit Requirements".

2. **Waste Types**

The variation application doesn't seek to make any amendments to the permitted waste list that is already authorised by the existing EA permit for the site. The list covers a broad range of wastes, for reasons of allowing commercial flexibility to accept wastes that, albeit rare, would possibly need to be received for treatment. The wastes have been demonstrated as being acceptable at the site by way of grant of the existing permit. This variation is being made to allow the onward transfer off site of these existing wastes when they can't be treated in the incinerator plant (i.e., planned shutdown, plant failure, contingency, capacity restrictions etc.). An updated waste list has been provided to the EA as part of the current Reg61 permit review and a copy of this is attached to this email. Note that although the site is referred to as a CWI, it also processes other wastes, mainly from Grundon's other facilities and transfer stations which in turn serve research facilities and universities leading to a broad spectrum of incoming waste streams. It also caters for emergency ad hoc work. For this reason, the list is kept broad to enable safe treatment of those wastes. In terms of 99 coded wastes, these would only be used if a more specific EWC code wasn't available, and a description would be provided at the time that best reflects the waste stream being accepted.

3. **Technical Standards**

The variation application doesn't seek to change any of the waste types, as per above. The existing waste is brought onto site and stored temporarily. This remains unchanged as an activity and is governed by existing pre-acceptance, and acceptance procedures which form part of the EMS. The storage of permitted wastes is also an existing permitted activity and remains as is, whether the waste is then subject to treatment on site in the incinerator or whether it is transferred off site for treatment or disposal elsewhere. This is therefore also governed by existing process controls and EMS procedures which are unaffected by the variation application. As such, the only 'new' activity in practice is the transfer of waste off site. A BAT conclusions table has been completed as follows for these sections, noting where they are unchanged by the variation.

BAT	Requirement	Grundon Techniques
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ref.		
3.1	Implementation of Pre-Acceptance Procedures	No change to pre-acceptance because of the variation application as it is the same waste being accepted, into the same site, and the same building. Existing procedures are part of the EMS already implemented at the site.
3.2	Implementation of Waste Acceptance Procedures	No change to pre-acceptance because of the variation application as it is the same waste being accepted, into the same site, and the same building. Existing procedures are part of the EMS already implemented at the site.
3.3	Waste Tracking	<p>A procedure is already in place to ensure that waste is tracked in accordance with the appropriate measures guidance. Currently this follows the incoming waste up to the point of treatment in the on-site CWI.</p> <p>For the waste stored pending transfer off-site, this will be tracked via duty of care records up to the point it is received and accepted by the transferee. The site inventory (which is already part of the site procedures) will capture all incoming consignments and link them to specific outgoing waste loads.</p>
4	Waste storage, segregation and handling appropriate measures to be employed	<p>There will be no change to existing practices regarding the storage of waste – i.e., types of containment, labelling, securing, handling etc. Waste types are not changing to that already permitted for acceptance at the site.</p> <p>Where waste is stored pending off-site transfer, it will be either in fully enclosed, lockable, rigid, leak-proof containers, or shrink-wrapped on pallets, no more than 2.2 m height. It will be stored for no longer than 14 days.</p> <p>The storage capacity remains unchanged by the variation and locations (with designated storage area and capacities) are defined on Grundon drawing DG/EN/CWI/SK/1175 provided in Appendix E of the variation application. Storage is within the existing building, within the existing EP boundary so no new measures are required to be taken.</p> <p>Waste will be prioritised for off-site transfer based on its type, age on arrival (if known), date of arrival and period it has been on site. This follows the first-in, first-out principle. Wastes with a higher potential to cause odour, litter or pest problems are prioritised for transfer. Repackaging of waste takes place inside the</p>

		<p>building and is limited to bulking of the same types of waste – no hazardous wastes will be mixed either with other wastes or materials or other categories of hazardous waste.</p> <p>Loading and unloading procedures for incoming waste are as per the existing EMS documentation. Where waste is being loaded for off-site transfer, procedures will be implemented to ensure that leakage or contamination is avoided.</p> <p>Waste being transferred off-site will be classified the same as the incoming waste as it has either been bulked with the same classification waste or stored without bulking pending transfer. The only exception is where the incoming waste description and/or classification was incorrect or incomplete and has been corrected as part of the waste acceptance procedure.</p> <p>No compaction of the waste being transferred off site will take place.</p>
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4. Application Fee

Following correspondence with the EA regarding the calculation of the fee, it has been established that the EA splits out the repackaging activity into two listed activities: 1) for waste subsequently transferred for recovery, and 2) for waste subsequently transferred for disposal.

On this basis the application fee for the variation is as follows:

- Listed activity A2 Hazardous waste treatment for recovery £16,001.00
- Listed activity A3 Hazardous waste treatment for disposal £16,001.00
- Waste Operation for non-hazardous waste treatment £7,930
- Habitats assessment £779.00

Total: £40,711.

The applicant has paid £23,931 to date. A further payment of £16,780 has been made today, payment reference PSCAPPGRUND322.

Please note that a request for abatement will be submitted shortly, based on the charging scheme allowing the reduction of an application fee if the sum of the parts incurred for a variation exceeds the cost that it would be for a new application. A new application would be £16,000 + £1,600.10 (a 90% reduction for the second listed activity), £7,930, and £779. This is a total of £26,310.00. A refund of £14,401 will therefore be formally requested.

We hope that the above and attached address your questions and we look forward to hearing from you regarding duly making.

If you have any further questions, please don't hesitate to contact me.

Kind regards
Rebecca



Rebecca Hodkinson (BEng (Mech Eng), PIEMA, AssocMCIWM, I-HWMA)

Director, Environmental Consultant

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From: Pearson, Charlotte [REDACTED]
Sent: 01 February 2023 09:13
To: [REDACTED]
Cc: Jones, Mark [REDACTED]
Subject: EPR/BT2866IG/V004 Grundons Waste Management Ltd - Not Duly Made

Hello Rebecca,

We need more information about your application.

Application reference: EPR/BT2866IG/V004
Operator: Grundons Waste Management Ltd
Facility: Lakeside Road Clinical Waste Incinerator

Further to my voicemail this morning, I do need some more information before I can complete the duly made checks. I would be grateful if you would confirm receipt of this email and please call me if you wish to discuss it further.

Please provide us with the following information:

1. **Part C2 Q3d: Confirm that your EMS will meet the Environment Agency's requirements.**

This is needed because you have not ticked the box to say that your EMS will meet our requirements. You can confirm by return of email.

2. **Part C3 Q1: Waste Types. Submit a list of waste types you will accept on to the facility for the waste transfer activities.**

The current permitted list of waste types does not provide an adequate description of the waste and contains some waste codes which do not appear suitable for this type of facility. Give the List of Wastes catalogue code and description (see [Waste classification technical guidance - GOV.UK \(www.gov.uk\)](http://www.gov.uk)). If you need to exclude waste from your activity or facility by restricting the description, quantity, physical nature, hazardous properties, composition or characteristic of the waste, include these in the document. If you want to accept any waste with a code ending in 99, you must provide more information and a full description of the waste (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste.

3. **Part C3 Q3 and C4 Q3 Technical Standards. Complete a BAT conclusions table for the**

new waste transfer activities. For each of the activities listed operations undertaken, describe the operations undertaken, and how you will meet the standards set out in the relevant technical guidance.

You have stated in the application form that the standards in 'SGN5.06 Sector Guidance Note for the Recovery and Disposal of Hazardous and Non Hazardous Waste Notes' and those in 'Healthcare waste: appropriate measures for permitted facilities' will be met but not described the operations/site set up in detail or provided evidence each aspect of the operation has been assessed against each of the standards/appropriate measures within the referenced documents. I am aware that you have submitted the waste acceptance procedures in support of the permit review work but information on the new storage and transfer activities and the site infrastructure relevant to those operations needs to be provided to ensure they are in line with the guidance.

- 4. Part F1 Table 2 – Charges. The application fee for the proposed changes to the permit is £40,711. To date, you have paid £23,931. There is an outstanding balance of £16,780 to pay.**

Please see attached table showing how the charge is worked out. Please be aware that section 3.7 of the charging scheme guidance states that the discounts that apply to multiple activities for new permits do not apply to variations. The Charging Scheme Guidance can be found here: [Environmental permits: when and how you are charged - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-permits-when-and-how-you-are-charged).

Please send the information, quoting the above application reference, to: [REDACTED]

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-charging-scheme-2019>

If you have any questions please contact me.

Kind regards

Charlotte

Charlotte Pearson

Senior Permitting Officer, Installations
Environment Agency | Aqua House, Lionel Street, Birmingham, B3 1AQ

[Redacted]
External: | Mobile: [Redacted]



Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.