

Heath, Katie

From: katie.heath@suez.com
To: White, Kerri
Subject: RE: Basic pre-application advice request- follow up question EPR/HB3705GN/P001 CRM:0817036 EAWML 101397

From: White, Kerri <kerri.white@environment-agency.gov.uk>
Sent: Thursday, August 1, 2024 10:13 AM
To: Heath, Katie <katie.heath@suez.com>
Subject: RE: Basic pre-application advice request- follow up question EPR/HB3705GN/P001 CRM:0817036 EAWML 101397

Hi Katie

Apologies for the delay in getting back to you

According to the Charging Group I was correct, you need to pay the variation charge for the HCI with transfer, then the full charge for the treatment of non- hazardous waste. As the clinical waste is new to the permit this is also at full price charge.

- 1.16.6 = £4,588 Household, commercial and industrial waste transfer station is the variation charge
- 1.16.12 = £ 7,930 Treatment of non-hazardous waste
- 1.16.7 = £7,930 Clinical waste transfer station

This is because standard rules permits are a basic type of permit which only allow certain activities on site and have strict parameters allowing them to be operated in certain areas. Whereas Bespoke permits are designed to be put together so that many waste types and activities can be combined to suite a individual company and area. Due to this more complex work, it has been decided that a bespoke permit only allows one activity in the initial variation charge even if more were included in a simpler standard rules. So that's why the HCI with Transfer has the variation charge and the treatment is added on top.

With regards to the charge for the Emissions management plan I apologise for putting this on the pre-application advice this was a mistake.

Kind regards

Kerri White MCIWM
Permitting Officer
NPS

My working days are Tuesday to Friday

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.



From: Heath, Katie <katie.heath@suez.com>
Sent: Friday, June 7, 2024 2:15 PM
To: White, Kerri <kerri.white@environment-agency.gov.uk>
Subject: RE: Basic pre-application advice request- follow up question EPR/HB3705GN/P001 CRM:0817036

Afternoon Kerri,

Thanks for your response. I have a few queries about the fee and the required management plans I'm hoping you can support me with.

1. You have stated that "To vary to a bespoke transfer station, you need the normal variation to a 1.16.6 activity and the 1.16.12 for treatment of non-hazardous waste.", which implies to me the fees for a normal variation to both are appropriate, however you have included the fees for a new 1.16.12 activity instead of a variation – should this not also be for a normal variation (£3,965)?
2. You have included the fee for an emissions management plan but haven't included it in the list of management plans/ detailed assessments required. Could you clarify if one is needed? We were not proposing to submit an emissions management plan, as site has a low risk of emissions (and did not require an emissions management plan under standard rules) and the additional activities will have negligible risk of causing additional emissions.

Thank you,

Katie

Katie Heath
Environment Permit Manager
SUEZ Recycling and Recovery UK

Mobile: +44 7855 196312



SUEZ Recycling and Recovery UK Ltd
Narborough Lodge – Huncote Road - Narborough - Leicestershire – LE19 3RQ - United Kingdom
www.suez.co.uk



From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: Thursday, June 6, 2024 2:38 PM
To: Heath, Katie <katie.heath@suez.com>
Cc: White, Kerri <kerri.white@environment-agency.gov.uk>
Subject: Basic pre-application advice request- follow up question EPR/HB3705GN/P001 CRM:0817036

Pre-application reference: **EPR/HB3705GN/P001**
Operator: SUEZ RECYCLING AND RECOVERY UK LTD
Facility: Taunton Depot, Walford Cross, Taunton, TA2 8QP

Dear Katie Heath

Thank you for your pre-application enquiry submitted on . Upon review of the information you have requested, it has been considered that the basic pre-application advice should be sufficient to answer your queries. Please see your pre-application advice, based on the information contained in the enquiry form you submitted.

Pre-application advice - Basic Service

a) Type of application required

To vary a standard rules permit to a bespoke waste permit for the same activity, you need to pay the relevant normal variation fee. The site operates as a waste transfer station with treatment of non-hazardous waste under SR2008 No 3. To vary to a bespoke transfer station, you need the normal variation to a 1.16.6 activity and the 1.16.12 for treatment of non-hazardous waste. This would allow for the transfer of the WEEE waste codes. In your pre-application request, you confirm compliance with the non-hazardous, inert and healthcare appropriate measures. In addition, you will need to comply with the WEEE appropriate measures also.

- 1.16.6 - Household , commercial and industrial waste transfer station; includes assessment of fire prevention plan and odour management plan.
- 1.16.12 - Treatment of non-hazardous waste

The addition of Healthcare wastes to the permit requires a clinical waste transfer activity. This is required if you wish to accept the 18 codes. Municipal offensive waste can be accepted under the waste transfer station, the Healthcare appropriate measure would still apply.

- 1.16.7 - Clinical waste transfer station.

The total application fee is £21,689

- 1.16.6 = £4,588 Household, commercial and industrial waste transfer station
- 1.16.7 = £7,930 Clinical waste transfer station
- 1.16.12 = £ 7,930 Treatment of non-hazardous waste
- 1.19.5 = £1,241 Emissions management plan (except where the application activity is a farming installation).

b) Material Storage and Drainage Arrangements

Based on the information provided the proposed wastes can be stored outside provided they meet the relevant appropriate measures. Please refer to Appropriate measures documents for full detail to ensure you meet the

requirements.

[Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/waste-electrical-and-electronic-equipment-weee-appropriate-measures-for-permitted-facilities)

[Healthcare waste: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/healthcare-waste-appropriate-measures-for-permitted-facilities)

c) Management Plans and Detailed Assessments

Forms required to be submitted

To vary your Permit, you will need to submit the following forms – Part A, Part C2, C4 and Part F1. Please ensure you download the latest version of the forms.

Part A - <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>

Part C2 - Application for an environmental permit: part C2 varying a bespoke permit - GOV.UK (www.gov.uk)

Part C4 - [Application for an environmental permit Part C4 – Varying a bespoke waste operation permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c4-varying-a-bespoke-waste-operation-permit)

Part F1 - <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations>

You will need to submit the following documents:

Non-Technical Summary

You need to send us a simple explanation of all the changes you propose to make. This should include a summary of your proposed operations and a summary of the key technical standards and control measures arising from your risk assessment. As a guide, this summary document should be around one to two pages in length.

Summary of your Environment Management System

As you are applying to change your activities, an update of your environmental management system (EMS) is required, and you must send a summary of your EMS with your application. Your EMS should include a plan for dealing with any incidents or events that could result in pollution. This should follow our guidance on producing an accident prevention and management plan.

A copy of your ISO 14001 certificate (or equivalent) is not sufficient on its own. You need to provide a summary of the site-specific management system. You should follow the guidance on developing a management system <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Site-specific environmental risk assessment

You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in 'Risk assessments for your environmental permit' at:

<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site>

Fire Prevention Plan (FPP)

You should submit a revised Fire Prevention Plan along with your application for assessment.

You must follow our guidance on Fire Prevention Plans. This tells you what to include in your FPP and the fire prevention measures you must put in place.

<https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>

Before we can begin the technical assessment of your permit application, the FPP must consider all aspects of the guidance. If there are areas of the guidance which do not apply, you must say why in the document. If you wish to deviate from the guidance, you must include alternative measures with full justification to demonstrate that such arrangements provide the same level of protection as required by the FPP objectives. We will assess your arrangements to determine whether they are adequate for the operations taking place on your site.

Habitats assessment

I confirm that the site is not within the nature and conservation screening distance. A habitats assessment is not required.

List of Wastes - Waste Codes

As your variation changes the types of waste accepted at your site, you need to provide a list of waste codes from the European Waste Catalogue for each activity. You should follow the waste classification technical guidance to decide what waste code your waste should be classified under.

Operating Techniques

You should detail any existing operating techniques (as listed in table S1.2 of your permit) that are subject to change by the variation application being made. You must demonstrate how you will meet any relevant technical standards, appropriate measures and best available techniques.

Your technical description should include plans showing the layout of your site. The technical assessment should also include details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment used (such as bunds) and how this meets any relevant standards. Please see the pollution prevention guidance for additional advice.

There is currently no firm timescale for the changes to be introduced, please see [Waste Exemptions - Getting ready for change - Register your waste exemptions - GOV.UK](#) for updates.

d) Technically Competent Manager

I confirm that the TCM would need to hold a hazardous waste transfer qualification as there is not a de minimis amount of hazardous waste for this requirement.

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers waste only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

This pre-application request is now closed.

Further enquiries resulting from this response must be logged as a new request using the online form:

<https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form>

Our basic pre-application service is free and is limited to the information detailed on section 2 of the Environmental permitting charges guidance on gov.uk.

If you need more extensive or technical pre-application advice, you can ask for our enhanced pre-application service. The enhanced pre-application advice is charged at £100 per hour plus VAT. You will need to complete and submit a new online pre-application request to request enhanced pre-application advice.

Yours sincerely

Kerri White

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.

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.

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.