



Maggie Dutton
AO Recycling Limited
11 Stafford Park
Telford
TF3 3AY

Our reference: **EA/EPR/HB3207LZ/V002**
Date: 05/05/2020

Dear Mrs. Maggie Dutton,

Pre application advice – Basic service
AO Recycling Limited

Following your pre-application request dated 22/04/2020 we have the following advice:

You will need to apply for a **substantial variation** to your current permit. You will need to submit the following forms. Please ensure you download the latest version of the forms, as your application will be returned if an old version of the forms is used.

Provide a fully completed version of Forms A, C2, C3 and F1. If sections are not applicable to your permit please indicate this rather than leaving a section blank.

- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>
- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c2-varying-a-bespoke-permit>
- <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-c3-varying-a-bespoke-installation-permit>
- <https://www.gov.uk/government/publications/application-to-vary-an-environmental-permit-part-c35>

Please also use the requirements stated within the aforementioned application forms as a guide to what supporting information is needed with your application.

Non-Technical Summary:

You need to send us a simple explanation of what the activities or changes are. This should include a summary of your operations, a summary of the key technical standards and control measures arising from your risk assessment.

A summary of your Environment Management System

Provide a summary of the EMS you have in place. A summary should cover all the points in 'Develop a management system: environmental permits' at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

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>

You should consider using our assessment tool to assess your environmental risk. Our assessment tool will inform you when more detailed modelling is required.

Site Plan(s):

If you are adding land as part of your application to vary the your permit you must send us a revised site plan that identifies all of the land on which your activities or waste operations, or mining waste operations (including mining waste facilities) (or all both) take place. The site plan should provide a date and a reference and must be drawn accurately to a defined scale. The outline of the site must be clearly marked. It will be helpful if local features are shown on the plan to help us place the site in its local environment.

If you are sending us a paper copy of your site plan it must be either A3 or A4 size. Alternatively you can send us an electronic copy on CD or via email.

Technical Description and BAT assessment:

You will need to provide a technical description of the changes you propose to make, detailing any changes to plant, equipment and infrastructure, including design capacities. You must demonstrate how you will meet any relevant Best Available Techniques. This should include consideration for any relevant Directives, such as Medium Combustion Plant Directive (MCPD), Energy Efficiency Directive and Waste Framework Directive (WFD). <https://www.gov.uk/guidance/best-available-techniques-environmental-permits>

This 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 (e.g. bunds) used and how this meets any relevant standards. Further guidance on this can be found at <https://www.gov.uk/guidance/pollution-prevention-for-businesses#storing-materials-products-and-waste>

You should also tell us how you monitor and control the emissions from the site and provide us with the standalone risk assessments/management plans requested below

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>

Noise Impact Assessment:

If you think that your operation is likely to cause pollution from noise or vibration beyond your site boundary you must provide a noise impact assessment (NIA) based on BS4142:2014+A1:2019 – 'Methods for rating and assessing industrial and commercial sound'.

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#noise-and-vibration-management-plan>

Where your assessment has used calculations or modelling to predict sound pressure levels at receptors, you must follow our guidance on the presentation of your acoustic data: Noise impact assessments involving calculations or modelling.

<https://www.gov.uk/guidance/noise-impact-assessments-involving-calculations-or-modelling>

Your NIA must be accompanied by a Noise Management Plan based on the results of your NIA.

Noise and Vibration Management Plan:

Where your risk assessment cannot screen out impacts from noise and vibration beyond your site boundary you must produce a noise and vibration management plan. The aim of the management plan is to prevent, or where that is not possible minimise, impacts to receptors.

Your noise management plan must take into consideration the outcomes of any noise and vibration impact assessment and provide evidence that appropriate mitigation measures have been taken to control the risks from the activity and operations undertaken on your site.

The Environment Agency have published guidance on appropriate measures and requirements of a management plan to assist you in the preparation of the plans.

<https://www.gov.uk/government/publications/environmental-permitting-h3-part-2-noise-assessment-and-control>

If you are unsure as to whether a Noise Impact Assessment and Noise Management Plan are required for your proposal please request [enhanced pre application advice](#). We may return the application, and potentially retain part of your fee, if we find a Noise Impact Assessment and Noise Management Plan should have been included as part of your application.

Accident prevention and management plan:

You need to include an accident prevention and management plan to cover the changes proposed which considers the requirements of this guidance <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#accident-prevention-and-management-plan>

Fire Prevention Plans:

You are required to submit a Fire Prevention Plan along with your application for assessment.

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

The Environment Agency has made a template for you to use to prepare your Fire Prevention Plan. The template includes guidance on how to complete the plan. You do not have to use the template to complete your Fire Prevention Plan but we recommend that you do. You can download the template at the link above.

Technical Competence:

You will need to send in evidence of appropriate technical competence for the changes you propose. You need to include certificates.

<https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits>

Waste Recovery Plan:

You will need to send in a revised waste recovery plan with your application which addresses the aspects in our guidance <https://www.gov.uk/guidance/waste-recovery-plans-and-permits>

Environment Management System –

A summary should cover all the points in ‘Develop a management system: environmental permits’ at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

Wamitab Scheme

<https://wamitab.org.uk>

Please ensure all relevant sections of the application forms are completed accurately and all required documents are submitted and fully completed – failure to do so could cause delays in processing and the potential for us retain a portion of the application fee should we need to return the application because it is incomplete. In addition, the F1 declaration must be signed by a relevant person as described in the F1 guidance.

The application fee would be calculated as follows:

Permit application fee		
Charge	Amount (£)	Line in scheme
<i>Section 5.3 (a)(ii) - hazardous waste installation – physico-chemical treatment.</i>	<i>£14,401.00</i>	<i>1.16.1.2</i>
<i>Section 5.6 – temporary or underground storage of hazardous waste.</i>	<i>£12,167.00</i>	<i>1.16.4</i>
Total baseline application charge	£26,568.00	

There may be additional costs (add-on charges) for the following assessments (see table below) depending on the risks the proposed installation poses.

Add-on fees		
Charge	Amount (£)	Line in scheme
<i>Fire prevention plan</i>	<i>1,241.00</i>	<i>1.19.3</i>
<i>Noise and vibration management plan</i>	<i>1,246.00</i>	<i>1.19.7</i>
Total component fee (estimate)	£2,487.00	

Total variation application fee = £29,055.00

Link: <https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

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 installations only. Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.'

What happens next?

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>

What basic pre application covers

The 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 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.

Applying for a permit

If you submit an environmental permit application then please quote this pre-application reference number **EPR/HB3207LZ/V002**.

If the advice above includes details using [online digital application form](#), your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk

We are not currently processing paper applications as our offices are closed. Any applications submitted via post will be stored at the Permitting Support Centre until we are able to re-open the office. For further information, please check our latest operational update on the [Environment Agency website](#).

Or by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Current application timescales

Dealing with the impact of COVID-19

We are following Government advice to manage the risks of Coronavirus to our organisation, to protect the health, safety and wellbeing of our staff and sustain our critical operations.

We are doing all we can to maintain our service, however it may take us longer than usual to respond to you. It is important that you inform us of any applications that are critical to maintain national resilience, national infrastructure and critical environmental protection.

Our current queues are large and we are taking longer than usual to allocate work for duly made checks. Please see the table below for current average queue times.

New standard rules	6-8 weeks
New Bespoke	10-12 weeks
Admin variation	4-6 weeks
Minor variation	10-12 weeks
Normal variation	8-10 weeks
Substantial variation	15-17 weeks
Transfer	6-8 weeks
Surrender	12-14 weeks
Medium Combustion Plant	10-12 weeks

A permit application must contain the following information:

Declaration

Please ensure the Declaration section is completed by each “relevant person”.

For an application from an individual, a relevant person is the person to be named on the permit.

For an application from more than one individual, each person who is applying for their name to be on the permit must complete the declaration – you will have to print a separate copy of the declaration page for each additional individual to complete.

In the case of a company, a relevant person must be an active director/company secretary as listed on Companies House – <https://beta.companieshouse.gov.uk/>

For a charity, a relevant person is a key postholder, ie, chair, chief executive, director or trustee.

Please ensure the declaration tick box is completed.

The Declaration section is found on Form F1 section 5 (or if you are completing Forms B6.5 or B6.6, it is in section 9).

Site Plan

The site plan must be clearly marked with the full site boundary

Application fee

Please note that your application will not be processed until we receive the full application fee payment.

If you have any questions please find my contact details below.

Yours sincerely

Chidi Ogbuka

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