

[REDACTED]

From: [REDACTED]
Sent: 14 February 2019 17:04
To: [REDACTED]
Subject: RE: Re: Not duly made letter 2 EPR/HB3004KS/A001
Attachments: Response 2 to EA.pdf; Towens Dust Management Plan v2.0 (OL).pdf; Part B4. Table 1a (1).pdf; BS4142 calcs.xlsx; Nicks WAMITAB certs.pdf

Good afternoon [REDACTED]

Please find attached a document, reference Response 2 to EA; This is your email asking for additional information, and my responses to those questions are in purple.

There are several documents referenced within the response document and I have attached those to this email. The additional information from the Noise consultant does make reference to the Transport Statement and site plan; I've not attached these as the Transport Statement was sent in with the original application and you already have a site plan showing the processing area.

The only outstanding item, as far as I can tell, is a site plan showing the dust suppression locations. Unfortunately this is still with the CAD technician but I hope the explanations added to the Dust Management Plan are enough to be going on with and to duly make the application? I will be getting the updated plan early next week and will forward it on as soon as I receive it.

Please could you confirm if you now have all of the required information?

Thank you for your help with this and kind regards

[REDACTED]



Director

Somerton Environmental Ltd

Tel: [REDACTED]

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On 07 February 2019 at 17:01 [REDACTED]
[REDACTED] > wrote:

Dear [REDACTED]

I acknowledge receipt of your response on 07/02/19. I have looked through the information that you have provided.

Thanks for the following clarification.

TCM

We are able to proceed with duly making on the basis of the explanation that you have provided. However please note that if Nick Towns is unable to supply the relevant certificates during determination we will have to restrict the TCM to Andy alone at permit issue.

Noise

We are happy to wait until the deadline to receive the revised Noise Impact Assessment (NIA). Regarding the Noise Management Plan (NMP), while we prefer separate standalone documents for the NIA and NMP, if it is not possible to produce a NMP at present as long as the mitigation details are in a separate section in the NIA then this may be suitable for duly making. Please note that further information may be requested during determination.

There are some things that we need further clarification about.

Part B4, Table 1a

Tonnages

In your response it states that until the site is operational the daily tonnages that will be processed are not known. If waste operations exceed certain limits then they become installations under the Industrial Emissions Directive (IED). The limit for treatment of non-hazardous waste for recovery is 75 tonnes per day. This is the aggregation of the following activities.

“Recovery or a mix or recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment is anaerobic digestion) involving one or more of the following activities and excluding activities covered by Council directive 91/271/EEC by-

- (i) biological treatment;
- (ii) pre-treatment of waste for incineration or co-incineration;

(iii) treatment of slags and ashes;

(iv) treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components.”

If your facility exceeds 75 tonnes then it is not a waste operation and you will need to apply for an installations permit instead. Please demonstrate that the facility is a waste operation.

Waste codes

Two of the waste codes in the table do not seem to fit with the activity that you have applied for, 1.16.12 Physical treatment of non-hazardous waste.

In the row Inert waste Treatment Facility – Screening and crushing hardcore you have listed EWC 17 03 03. There is an EWC code 17 03 03* Coal tar and tarred products, which is a hazardous waste. This waste type cannot be treated under any non-hazardous activity. 17 03 03* was not included in the original list of wastes in your application. Please confirm that you are not going to accept 17 03 03* Coal tar and tarred products. If you are treating this waste code then you cannot have a permit for treating non-hazardous waste and will need to withdraw this application and apply for a permit for a hazardous waste activity.

You have also included the waste type EWC 07 01 01. There is an EWC code 07 01 01*. As you have not applied for any 07 waste codes originally and 07 01 01* is aqueous washing liquids and mother liquids which not a waste type that can be crushed I presume that this is an error. There is a waste code 17 01 01 concrete. Please confirm that there was a typo and that you want 17 01 01.

Dust Management Plan

Details of other sources of dust within 1 km

I note that you are currently working on this question. I can confirm that yes, the information required is a list of other locations that may produce dust. This was requested based upon the Dust and Particulate Emissions Management Plan (DEMP) template version 10 (attached). Under section 1.1 Sensitive receptors it says:

“You must also consider the amenity impact of dust and other emissions within the 1000m radius of your site. Do not forget to consider clean industry and manufacturing processes such as, but not limited to, powder coaters and paint shops, offices, diesel generators, busy roads, power stations, food manufacturing and food outlets, agricultural land, the location of solar panels or air conditioning systems in the near vicinity, and areas of car parking.”

The DEMP is referring to other local sources of dust and particulates and suggests that this information is put in a table.

Detail how you intend to break the source-pathway-receptor model for each of the receptors for your dust sources

While the information you provided in section 3.13 of your plan is useful we need more specific information for each receptor. The DEMP has a table 3.1: Source-Pathway-Receptor Routes, which shows the level of detail required

I will wait until our agreed deadline of 15 February to receive the rest of the information. If you have any queries please contact me.

Thanks for your time and effort.

With kind regards.

Yours sincerely

[REDACTED]

From: [REDACTED]
Sent: 07 February 2019 09:53
To: [REDACTED]
Subject: Fwd: Re: Not duly made letter 2 EPR/HB3004KS/A001

Good morning

Apologies for not attaching the attachments yesterday, I'm such a plonker! Please find attached now.

Kind regards

[REDACTED]



Director

Somerton Environmental Ltd



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----- Original Message -----

From: [REDACTED]
To: [REDACTED]
PSC Land <PSC@environment-agency.gov.uk>
Date: 06 February 2019 at 14:20
Subject: Re: Not duly made letter 2 EPR/HB3004KS/A001

Good afternoon

Please find attached a document titled 'Response 1 to EA Westonzoyland'. This seeks to answer many of the questions posed in the below email but also asks for clarification on a few points; Please could you provide clarification where asked? In addition, and in response to the questions, please find attached:

- Part B4 table 1a
- SCR.WZ.18
- SCRH5.WZ.2019.V1
- Supporting documents SD.WZ.2018
- Westonzoyland Risk Assessment

We aim to have the additional information with you by Friday 15th February 2019.

Kind regards



Director

Somerton Environmental Ltd



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On 01 February 2019 at 15:50 [REDACTED]

[REDACTED] wrote:

Dear [REDACTED]

Application Reference: EPR/HB3004KS/A001

Operator: Towens Of Weston Ltd

Facility: Towens Of Weston Ltd, Westonzoyland

I write further to your email dated 23/01/19. Thank you for the additional payment and for sending Andy Read's WAMITAB certificate. I have assessed your application and in order to duly make it we require further information.

TCM

I can confirm that Andy has a suitable qualification for being the Technically Competent Manager (TCM) for the site. However until Nick Towens is able to provide his original certificate he is unable to share the role of being the TCM for the site.

- Please can you confirm that Andy will be the sole TCM or provide Nick's certificate.
 - Amend the response to Part B2, question 3b.

Dust Management Plan

Please can you amend the plan.

- The plan refers to SCR.WZ.2017 Site Layout Plan but this is not included in the Dust Management

Plan. Provide a site layout plan showing infrastructure, location of buildings, loading and unloading areas, storage bays, fixed plant (such as crushers), locations of any mobile plant, locations of suppression systems and nozzle heads (including their arc coverage area), different types of site surface, etc. (More than one site plan is acceptable if one plan would be too complex or busy.)

- Provide details of other sources of dust within 1 km of your site e.g. from the industrial estate.
- Detail how you intend to break the source-pathway-receptor model for each of the receptors for your dust sources
- Detail how you will interact with neighbouring businesses/local residents.
- The risk assessment states that the reference number of the Dust Management Plan is 41121_70496. This number does not appear in the Dust Management Plan. If this is the correct number then please add it to the Dust Management Plan. If not amend the risk assessment with the correct reference for the Dust Management Plan.

Noise Impact Assessment (NIA)

Please can you amend the NIA.

- Provide the computer modelling or spreadsheet calculations that were used in the BS4142:2014 assessment.

Noise Impact Assessments need to include description of the noise mitigation measures proposed and supporting evidence, such as the manufacturer's engineering specification for items that mitigate noise emissions, or

calculations of the screening effect of barriers. It states that there will be a 2.5m wooden closed board fence or concrete block wall.

- Provide the engineering specifications and calculations for the wooden closed board fence and concrete block wall.

Provide the following details for fixed and mobile plant on this site, for example, the crusher.

- Grid references (use 1 metre resolution National Grid references for all location data),
- referenced or derived sound power levels (preferably octave band, for derived provide the measurements and calculations)
- heights
- directivities
- operating times (The Noise Impact Assessment states 2 or 3 times a week for 1 to 2 hours but if you have any specific details please provide these or confirm you have no further details.)

Provide the following information about site traffic:

- grid references for site roads
- vehicle sound power levels
- traffic numbers
- traffic speed

For all site buildings, provide:

- corner grid references
- heights

Noise Management Plan

After assessing your permit application we consider that a Noise Management Plan is also necessary.

- Please submit a Noise Management Plan with full details of any mitigation and appropriate measures to be put in place to achieve acceptable noise emissions from the site either at source or on the pathway to sensitive receptors and which justifies any barriers to be used, with barrier calculations using a recognised method of barrier attenuation.

Waste types and activity codes

You are proposing 4 different activities on your site. Please provide the following breakdown of the treatment operations you carry out.

- Provide a list of which waste codes are treated under each treatment operation, further broken down by which are treated under R3 and which under R5.
- Provide the tonnages per day that are treated under each treatment and each R code.

Site condition report (SCR)

Please can you amend the SCR.

- It says in 1.0 Site Details in the Site Condition Report template that has been provided that the document reference and dates for the Site Condition Report at permit application is SCR.WZ.18 and in 2.0 Condition of the land at permit issue it says “See report SCR.WZ.18”. This reference is not shown anywhere within the Site Condition Report. However it says SCR.WZ.2017 in the supporting information. Please clarify which is the reference and/or provide an amended version of the Site Condition Report that has this document reference clearly within the Site Condition Report.

- Site Condition Reports need a date and a version number. In the supporting information the date is 12/09/18. Please update document control and put an amended date and add a version number.
- Provide an additional site plan showing the site and the receptors within 1 km.
- It says in 1.2.5.3 that there is a drainage plan within the permit application but I can't find it. Please send this drawing of the site drainage and reference it in the Site Condition Report.
- Site Condition Reports need to include evidence of historical contamination (i.e. historical site investigation, assessment, remediation and verification reports (where available). Is 1.3 and 1.4 meant to be the evidence of historical contamination? If not either provide the evidence of historical contamination or confirm that it is not available.

Risk assessment

- The risk assessment refers to 41121_70482_180608_Towens of Weston_Site Plan. I cannot find a plan with this reference number within the application. Please provide this plan or correct the reference number within the risk assessment.

Please send the information, quoting the above application reference, to:

Email address: psc@environment-agency.gov.uk.

Postal address:

Permitting and Support Centre

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Please send the information within 10 working days of this letter, i.e. by the close of 15 February 2019. If we don't hear from you, we must return your application.

When we receive the requested information, 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 appropriate 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-ep-charges-scheme>.

If you have any questions please phone me on 020 847 45479 or email joanne.summerill@environment-agency.gov.uk.

Yours sincerely



██████████
Permitting Officer (Waste), Solihull Centre, National Permitting Service

Part of Operations – Regulation, Monitoring and Customer
Environment Agency | Sapphire East, 550 Streetsbrook Road,
Solihull, West Midlands, B91 1QT



Working days: Mon to Fri

My incident role is : National Flood Forecasting Duty Management
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