

Dr Richard Hooper  
Mayer Environmental Ltd  
Eliot Park Innovation Centre  
4 Barling Way  
Nuneaton  
CV10 7RH

**Our ref:** EPR/GP3292FT/V009

**Date:** 23/05/2023

Dear Richard,

**We need more information about your application and underpayment of application charge**

**Application reference:** EPR/GP3292FT/V009

**Operator:** European Metal Recycling Ltd

**Facility:** European Metal Recycling Ltd - Fridge Destruction, Bentley Road South, Darlaston, West Midlands, WS10 8LW

**1) Payment**

Thank you for your application received on 03/07/2022. The following is to confirm our conversation of **23/05/2023**.

Unfortunately the application payment you sent is incorrect. The correct application charge is £18,908. This leaves a balance of £3,266 to pay.

The below provides an explanation of the charges identified.

- 1.16.1.2 - Section 5.3 (a)(i) - hazardous waste installation – Physico-chemical treatment. - £14,401
- 1.19.2 – Habitats assessment - £779
- 1.19.3 – Fire prevention plan - £1,241
- 1.19.5 – Emission management plan - £1,241
- 1.19.7 – Noise and Vibration management plan - £1,246

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions:

**2) Provide the information requested in Application form Part C2 – General – varying a bespoke permit.**

- a) Question 5a – Provide a plan or plans for the site** – You have provided ‘129-001790-02 Site Plan’ and ‘129-001790-02 Site Drainage Plan’. On review of these site plans they do not seem to be updated to reflect the new waste cooling equipment destruction plant. On review of your ‘Site drainage plan’ this does not show the location of your foul and combined drainage facilities. Guidance on what site plans

should include can be located at <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#prepare-your-site-infrastructure-plan>

- I. Provide an update 'Site plan' that includes the location of the new waste cooling equipment destruction plant, and that meets the requirements of guidance <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#prepare-your-site-infrastructure-plan>
  - II. Provide an updated 'Site drainage plan' that meets the requirements of <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits#prepare-your-site-infrastructure-plan>
- b) **Question 5a – Provide a plan or plans for the site** – Requires that you provide plans, drawings or process flow diagrams of the new waste cooling equipment destruction plant. On review of your application we cannot locate a process flow of the new waste cooling equipment destruction plant, or any plant design drawings. Provide a process flow for the new waste cooling equipment destruction plant to clearly show the processes undertaken within the new plant.
- c) **Question 5b – Do any of the variations you plan to make need extra land to be included in the permit** - In response to this question you have answered yes, however you have not provided an updated site condition report for the extra land being added. Guidance <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report> sets out the requirements for adding land to a permit. Provide your updated site condition report for the extra land being added to the permit boundary.
- d) **Question 5c - Provide a non-technical summary of your application.** You have advised that your application is for the installation of a new waste cooling equipment destruction plant which will replace the two existing installations, however you have not provided a non-technical summary of how the new waste cooling equipment destruction plant will operate. Provide a non-technical summary of the new waste cooling equipment destruction plant explaining the steps the process will undertake.
- e) **Question 6 – Environmental risk assessment** – Under guidance <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site> you must submit a noise and vibration impact assessment and noise management plan if there are sensitive receptors close to the site, and you will be doing any noisy operations. On review of your application you have houses located within 200m of the facility and you will be undertaking noisy operations and have not assessed the impact of the new waste cooling equipment destruction plant which will replace the two existing installations. Provide a noise and vibration impact assessment and noise management plan. (note: the raw environmental sound survey data in an Excel format must be provided along with any relevant modelling files/calculation sheets.)
- f) **Question 6 – Environmental risk assessment** – Under guidance <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#risks-from-your-site> you must check for protected sites and species. On review of your application you have provided relevant species and habitats for a site not in your permit location, and you have not provided an environmental risk assessment that includes the relevant habitats and species. Update your environmental risk assessment to include relevant habitats and species for the permit location, and provide an assessment of the risk.

- g) Question 6 – Environmental risk assessment** - You need to send us a Dust Management Plan. This should explain how you'll prevent or minimise dust in line with our guidance control and monitor emissions for your environmental permit (<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>) to control dust emission as a result of the new fridge destruction plant.
- 3) Provide the information requested in Application form Part C3 – Variation to a bespoke installation permit**
- a) Question 2 Point source emissions to air, water and land** – You have identified in table 2 a new point source emissions to air, however you have not provided the national grid reference (NGR) for this emission point, or provided an assessment in line with <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>.
- I. Provide the NGR for this emission to air.
  - II. Provide an assessment of the emission to air in line with guidance <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- b) Question 3 Operating techniques** – On review of the non-technical summary while you have mentioned best available techniques (BAT), you have not provided a full assessment of all relevant BAT points. Provide a written assessment against BAT and <https://www.gov.uk/guidance/waste-temperature-exchange-equipment-appropriate-measures-for-permitted-facilities> of the measures you will use to control the emissions from your process identified as the new waste cooling equipment destruction plant.
- c) Question 3c Types and amounts of raw materials** – We have noted that you have not completed table 5 identifying the types and amounts of raw materials on site. Provide an revised C3 form that includes the types and amounts of raw materials to be held on site.
- d) Question 4 Monitoring** – you have advised in your non-technical summary that “The monitoring requirement for both the stack and ambient air monitoring is quarterly, and will remain in place following the proposed variation, although the final air monitoring location will have to be agreed.” We believe that this relates to a new emission point for the new fridge destruction plant. This defers your answer and does not provide the information required to duly make your application. For the new emission to air point for the fridge destruction plant. Provide an updated C3 from with questions 4a and 4b answered.

Please reply directly to this email with your information and copy in



Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days we will return your application.

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the

