

Mrs Nicola Adams
Rose Cottage
50 Walsall Wood Road
Aldridge
WS9 8QT

Our ref: EPR/VP3736QQ/A001/NDML
Your ref: EPR/VP3736QQ/A001

Date: 17 December 2018

Dear Mrs Adams,

We need more information about your application and Underpayment of application charge

Application reference: EPR/VP3736QQ/A001

Operator: Impalloy Limited

Facility: Formally Trojan Engineering, Fryers Road, Bloxwich, Walsall, WS2 7LZ

Thank you for your application received on 26th November 2018.

Unfortunately the application payment you sent is incorrect. The correct application charge is £14,763 This leaves a balance of £779 to pay.

Your application requires an assessment under the Habitats Regulations. The charge for this assessment is not included in your baseline application charge. You will therefore need to make an additional payment of £779.

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:

- Form Part B2
 - Question 3d – Management System
 - Please supply a summary of your management system
 - Question 5a – Site Plan
 - Please supply a drainage plan of the site ensuring inclusion of the location of the on-site diesel tanks
 - Question 6 – Environmental Risk Assessment – please revise this document and resubmit ensuring:
 - Point source emissions to air. Please include the on-site point source emissions to air into your H1 risk assessment.
Background: Whilst the burners are small enough to be considered as having an insignificant impact on air quality, they are still point source emissions (A3 & A4) and need to be included into the risk assessment (and subsequently into the permit) as point source emission points (with no monitoring requirements).

The welding booth emission point (A2) also needs to be included into the risk assessment (and the permit) for the same reasons as above.

- Inclusion of all habitat and non-statutory conservation site, and protected species and habitats. Please identify and assess any potential impacts (from emissions to air and water) on the following sites, species and habitats:
 - Special Areas of Conservation (SACs)
 - Cannock Extension Canal (within 4285m)
 - Local Nature Reserves (LNRs)
 - Rough Wood Chase (within 479m)
 - Rough Wood (within 640m)
 - Local Wildlife Sites (LWSs)
 - Anson Branch Canal (within 1,592m)
 - Poplar Avenue Pond (within 1,659m)
 - Pouk Hill Quarry (within 1,711m)
 - Walsall Power Station Pool (within 1,257m)
 - Moorside Gardens (within 2,039m)
 - Green Lane Cutting (within 1,465m)
 - Walsall Canal (within 1,352m)
 - Bentley Haye (within 617m)
 - Land east of Poplar Avenue (within 1,271m)
 - Wyrley and Essington Canal (within 212m)
 - Lichfield Road Railway Hedges (within 1,468m)
 - Sneyd Reservoir (within 1,513m)
 - Rough Wood Chase (within 316m)
 - Bealeys Lane Hedges (within 1,946m)
 - Ancient Woodland (AWs)
 - Rough Wood South
 - Rough Wood

Background: incorrect screening distances have currently been used with regards to relevant sites, species and habitats. The correct screening distances to be used should be 10km for European Sites (SAC, SPA and Ramsar) and 2km for LNR, LWSs and AWs.

- Inclusion of flood risk from surface water. Please include an assessment and proposed risks, impacts and mitigation measures into the 'accident' section of your H1 risk assessment.

Background: it has been mentioned in your submitted H1 Risk Assessment that the site is not within any flood zones, however using our internal mapping system the perimeter of the site does have a risk of flooding from surface water. This needs to be considered in your risk assessment, specifically with how flood water potentially entering the building will be managed/mitigated.



- Form Part B3
 - Table 3a – technical standards
 - Please confirm that your site surfaces, including roofs, hard standing, working areas, any containment structures required by your permit, such as bunds or other secondary containment measures, and your site drainage infrastructure will prevent pollution to surface water and groundwater as per [gov.uk guidance](https://www.gov.uk/guidance) and whether this infrastructure has been constructed in line with CIRIA 736 (Containment systems for the prevention of pollution). If so please also include reference to CIRIA 736 into this table.

Background: construction of a site is generally to achieve an impermeable surface with a sealed drainage system

- Please confirm whether the bunding for the on-site diesel tanks conforms to the requirements of gov.uk guidance.

Background: we need confirmation that the bunding has a capacity larger than 110% of the tank the bund is protecting or 25% of the combined volume of all of the tanks the bund is protecting.

- Question 6e – waste minimisation review

- Please submit a waste minimisation review

Background: this question has been answered and the application supporting document referenced, however this document doesn't contain a waste minimisation review.

- Form Part F1

- Table 3 – additional component charge

- Please tick the 'habitats assessment' box, amend the 'total charges' section and resubmit the form

Background: as there is a SAC within the screening distance of your site we will need to carry out a habitats assessment and the additional component charge applies to your application fee.

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 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 don't hear from you, we must return your application.

When we receive the requested information and payment, 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-ep-charges-scheme>

If you have any questions please phone me on 02030 252841 or email rach.hopkin@environment-agency.gov.uk.

Yours sincerely

Rach Hopkin
Senior Permitting Officer