

# Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

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H.J. Enthoven Limited

Ecobat Logistics  
G&P House  
Crescent Works  
Willenhall Road  
Darlaston  
Wednesbury  
West Midlands  
WS10 8JR

**Variation application number**

EPR/DB3704FG/V004

**Permit number**

EPR/DB3704FG

# Ecobat Logistics

## Permit number EPR/DB3704FG

### Introductory note

#### **This introductory note does not form a part of the notice**

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

Ecobat Logistics is located on the northern edge of Darlaston south of the A454. The site is surrounded by industrial/commercial premises being part of an established industrial/commercial area.

The site is a transfer facility predominantly carrying out treatment and storage of batteries. Batteries are bought onto site, manually sorted, repackaged, and stored ready for onward recovery. The site also manually sorts and removes batteries from WEEE.

The total quantity of waste accepted at the site for all activities shall not exceed 75,000 tonnes per year consisting of the following:

- no more than 35,000 tonnes of hazardous waste; and
- no more than 40,000 tonnes of non-hazardous waste.

The storage of hazardous waste shall not exceed 500 tonnes at any one time and shall not exceed 1,500 tonnes at any one time for non-hazardous waste.

All activities are carried out on impermeable surface with sealed drainage. All contaminated water arising from onsite processes go through the onsite effluent treatment plant.

This variation allows an acceptance of new waste types including fuel and antifreeze liquids from end of life vehicles and aerosols in relation to activity S5.6 A (1)(a), Temporary storage of hazardous waste with a capacity exceeding 50 tonnes.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Licence SL2035 EAWML42701 determined	08/05/1997	Original licence for material recycling facility issued to G&P Batteries Limited.
Licence modified	21/04/1999	
Licence modified	20/11/2002	
Licence modified	04/12/2003	
Application DP3292LC/V003	Duly made 17/10/2008	
Additional information received	03/11/2008	
Variation DP3292LC/V003 issued	09/03/2009	Licence variation issued to extend the specified land and to increase storage of wastes.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application DP3292LC/V004	Duly made 27/04/2010	
Variation DP3292LC/V004 issued	27/07/2010	Permit varied to extend the site boundary
Application EPR/DB3704FG/T001 (full transfer of permit EPR/DP3292LC	Duly made 16/12/2015	Application to transfer the permit in full to H.J. Enthoven Limited
Application EPR/DB3704FG/T001 (full transfer of permit EPR/DP3292LC	29/12/2015	Transfer determined
Application EPR/DB3704FG/V002	Duly made 10/01/2017	Application to remove on site wheel wash, install a bin washing machine and consolidate the permit.
Additional information received	20/02/2017	Updated site plans February 2017.
Additional information received	08/03/2017	Updated Waste Battery Acceptance & Sampling Process Flow EP12 Rev.02.
Permit determined EPR/DB3704FG	07/04/2017	Permit issued to H.J. Enthoven Limited.
Notified of change of Site Name	14/01/2019	Site Name changed to Ecobat Logistics, G&P House, Crescent Works, Willenhall Road, Darlaston, Wednesbury, West Midlands, WS10 8JR
Variation issued EPR/DB3704FG/V003	25/01/2019	Varied permit issued to H.J. Enthoven Limited.
Application EPR/DB3704FG/V004 (variation and consolidation)	Duly made 28/06/2019	Application to vary the permit to include new waste types for hazardous waste storage.
Response to schedule 5 notice dated 17/07/2019	19/07/2019	Additional information received regarding aerosols storage arrangements and waste acceptance.
Variation determined EPR/DB3704FG Billing ref. - Installation - QP3803PH - Waste – EAWML 42701	26/07/2019	Varied permit issued.

End of introductory note

# Notice of variation and consolidation

## The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

### Permit number

**EPR/DB3704FG**

### Issued to

**H.J. Enthoven Limited** (“the operator”)

whose registered office is

**Darley Dale Smelter**

**South Darley**

**Matlock**

**Derbyshire**

**DE4 2LP**

company registration number 02821551

to operate a regulated facility at

**Ecobat Logistics**

**G&P House**

**Crescent Works**

**Willenhall Road**

**Darlaston**

**Wednesbury**

**West Midlands**

**WS10 8JR**

to the extent set out in the schedules.

The notice shall take effect 26/07/2019

Name	Date
David Griffiths	26/07/2019

Authorised on behalf of the Environment Agency

## **Schedule 1**

The following conditions were varied as a result of the application made by the operator:

Table S1.1 as referenced in condition 2.1.1 to include new limits of activities.

Table S1.2 as referenced in conditions 2.3.1 and 2.3.2 to include new operating techniques.

Table S2.4 as referenced in condition 2.3.3 to include new waste codes.

## **Schedule 2 – consolidated permit**

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/DB3704FG**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/DB3704FG/V004 authorising,

**H.J. Enthoven Limited** (“the operator”),

whose registered office is

**Darley Dale Smelter**

**South Darley**

**Matlock**

**Derbyshire**

**DE4 2LP**

company registration number 02821551

to operate an installation and waste operations at

**Ecobat Logistics**

**G&P House**

**Crescent Works**

**Willenhall Road**

**Darlaston**

**Wednesbury**

**West Midlands**

**WS10 8JR**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
David Griffiths	26/07/2019

Authorised on behalf of the Environment Agency

# Conditions

## 1 Management

### 1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
  - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.
- 1.1.4 The operator shall comply with the requirements of an approved competence scheme [or other approval issued by the Environment Agency].

### 1.2 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR8) The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
  - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
  - (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

- 1.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR8) The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
  - (b) maintain records of raw materials and water used in the activities;
  - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
  - (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
  - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
  - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## **2 Operations**

### **2.1 Permitted activities**

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

### **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

- 2.3.1 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR10) the activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3, S2.4 and S2.5; and
  - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

#### **Hazardous waste storage and treatment**

- 2.3.6 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.



## **2.4 Improvement programme**

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 table S3.1.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

### **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
  - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

### **3.3 Odour**

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
  - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.4 Noise and vibration**

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
  - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.5 Monitoring**

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in table S3.1;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 table S3.1 unless otherwise agreed in writing by the Environment Agency.

### **3.6 Pests**

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
  - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

### **3.7 Fire prevention**

- 3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

3.7.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
- (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## 4 Information

### 4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
  - (i) off-site environmental effects; and
  - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

### 4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR3) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production /treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter, if during that quarter the total amount accepted exceeds 100 tonnes of non-hazardous waste or 10 tonnes of hazardous waste.

### 4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform the Environment Agency,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1(a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
  - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
  - (b) any steps taken with a view to the dissolution of the operator.
- 4.3.4 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- 4.3.5 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

- 4.3.6 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

#### **4.4 Interpretation**

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “immediately” in which case it may be provided by telephone.

# Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity and waste types
AR1	S5.3 A(1)(a)(iv) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving repackaging.	Treatment of more than 10 tonnes of hazardous wastes a day for the purpose of recovery.  R4: Recycling/reclamation of metals and metal compounds	From receipt and storage of hazardous waste prior to despatch off site.  Treatment consisting of manual sorting, separation and bulking of hazardous waste (batteries only).  All treatment must take place on an impermeable surface with sealed drainage.  Waste types as specified in Table S2.2.
AR2	S5.3 A(1)(a)(ii) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.	pH adjustment of more than 10 tonnes of hazardous wastes a day for the purpose of disposal.  D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by any of the operations numbered D01 to D12.	pH adjustment of contaminated water arising from on site processes prior to filter press process.  Waste types as specified in Table S2.2.
AR3	S5.6 A(1)(a) Temporary storage of hazardous waste in a facility with a total capacity exceeding 50 tonnes pending any of the activities listed in Section 5.1, 5.2 and 5.3	Temporary storage of more than 50 tonnes of hazardous waste pending disposal or recovery.  D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).  R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage pending collection, on the site where it is produced)	Storage of hazardous waste pending transfer for treatment off site.  Total storage not to exceed 500 tonnes of hazardous waste at any one time.  No waste shall be stored for longer than 6 months.  All wastes shall be stored on impermeable pavement with sealed drainage.  All containers used to store waste outside the building shall be sealed to prevent the ingress or egress of liquid.  All aerosols to be stored under cover in closed containers or cages.  Waste types restricted to the hazardous wastes listed in table S2.2 and S2.4.

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity and WFD Annex I and II operations</b>	<b>Limits of specified activity and waste types</b>
	<b>Directly Associated Activity</b>		
AR4	Bin washing plant	Treatment of nominally empty containers in a bin washing plant to remove hazardous residue.	Only nominally empty containers previously used to contain batteries  Washings to be treated in the on site effluent treatment plant (AR2) prior to discharge to sewer.
AR5	Temporary storage of non-hazardous waste	Temporary storage of non-hazardous waste incidental to the acceptance of batteries.  D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).  R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage pending collection, on the site where it is produced)	Storage of non-hazardous waste pending transfer for treatment off site.  In total storage of non-hazardous waste should not exceed 1,500 tonnes at any one time.  No waste shall be stored for longer than 6 months.  All wastes shall be stored on impermeable pavement with sealed drainage.  Waste types as specified in Table S2.3.
AR6	Raw materials handling and storage	Handling and storage of raw materials, including fuel and chemicals	Receipt and storage of any raw materials directly associated with the permitted activities on site.
AR7	Filtrate and filter cake storage	Storage of separated filtrate and filter cakes from the filter press	Filtrate to be stored in a storage tank, filter cakes to be stored in skips or bags.
AR8	Discharge to foul sewer	Discharge to foul sewer under the terms of the trade effluent consent.	Waste and site drainage (excluding clean roof water) to be discharged to foul sewer.

<b>Table S1.1 activities</b>		
<b>Activity reference</b>	<b>Description of activities for waste operations</b>	<b>Limits of activities</b>
AR9	<p>Storage of non-hazardous waste before transfer off site.</p> <p>D15: Storage pending any of the operations numbered D1 to D14.</p> <p>R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage pending collection, on the site where it is produced)</p>	<p>From receipt and temporary storage of non-hazardous wastes that is not directly associated with AR1 before transfer off site.</p> <p>In total storage of non-hazardous waste should not to exceed 1,500 tonnes at any one time.</p> <p>Storage must take place on impermeable surface with sealed drainage</p> <p>No waste shall be stored for longer than 6 months.</p> <p>Waste types and quantity restricted to the non-hazardous wastes listed in table S2.5.</p>
AR10	<p>Treatment of WEEE to remove batteries.</p> <p>R4: Recycling/reclamation of metals and metal compounds</p>	<p>Treatment limited to the manual sorting and removal of batteries from WEEE in association with AR1 above.</p> <p>No waste shall be stored for longer than 6 months.</p> <p>All wastes shall be stored on impermeable pavement with sealed drainage.</p> <p>There shall be no treatment of WEEE containing ozone depleting substances.</p> <p>Waste types as specified in Table S2.4 and S2.5.</p>

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Variation Application EPR/DB3704FG/V002	Application forms C2 and C3 and referenced supporting information	Duly Made 10/01/2017
Additional information received	Updated site plans February 2017	20/02/2017
Additional information received	Updated Waste Battery Acceptance & Sampling Process Flow EP12 Rev.02	08/03/2017
Variation Application EPR/DB3704FG/V004	Site Plan – general arrangements, June 2019 Environmental Risk Assessment, Ref. RA-47, June 2019 – controls to mitigate/negate the risk	28/06/2019
Additional information received	Waste Pre-acceptance process Non-Battery Waste EP14 Rev01	19/07/2019
Schedule 5 Notice Response	Waste Acceptance & Sampling Process EP12 Rev06	



<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC1	<p>The Operator shall carry out an options appraisal review for the packaging of lead acid batteries for transport. The review shall consider, but not be limited to:</p> <ul style="list-style-type: none"> <li>• measures to minimise the physical damage to battery casings</li> <li>• measures to minimise the potential for pollution from battery acid leaks during transport and storage</li> <li>• proposals for amendments to existing procedures and/or for the implementation of additional measures to ensure the safe storage and transportation of batteries and appropriate treatment of battery acid</li> </ul> <p>The Operator shall submit a written report of the review to the Environment Agency for approval and shall implement any improvements identified to a timetable agreed in writing with the Environment Agency.</p>	Completed

## Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

Table S2.2 Permitted waste types and quantities for activities AR1 and AR3	
Maximum quantity	The total waste accepted at site for all activities will not exceed 75,000 tonnes per year. Consisting of no more than 35,000 tonnes of hazardous waste.
Waste code	Description
<b>09</b>	<b>Wastes from the photographic industry</b>
<b>09 01</b>	<b>wastes from the photographic industry</b>
09 01 11*	single-use cameras containing batteries included in 16 06 01, 16 06 02 or 16 06 03
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
<b>16 02</b>	<b>wastes from electrical and electronic equipment</b>
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
<b>16 06</b>	<b>batteries and accumulators</b>
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	mercury-containing batteries
<b>20</b>	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
20 01 33*	batteries and accumulators included in 16 06 01, 16 06 02 or 16 06 03 and unsorted batteries and accumulators containing these batteries
20 01 35*	discarded electrical and electronic equipment other than those mentioned in 20 01 21 and 20 01 23 containing hazardous components

Table S2.3 Permitted waste types and quantities for activities AR5	
Maximum quantity	The total waste accepted at site for all activities will not exceed 75,000 tonnes per year. Consisting of no more than 40,000 tonnes of non hazardous waste.
Waste code	Description
<b>09</b>	<b>Wastes from the photographic industry</b>
<b>09 01</b>	<b>wastes from the photographic industry</b>
09 01 12	single-use cameras containing batteries other than those mentioned in 09 01 11
<b>16</b>	<b>Wastes not otherwise specified in the list</b>

<b>Table S2.3 Permitted waste types and quantities for activities AR5</b>	
<b>Maximum quantity</b>	<b>The total waste accepted at site for all activities will not exceed 75,000 tonnes per year. Consisting of no more than 40,000 tonnes of non hazardous waste.</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
<b>16 02</b>	<b>wastes from electrical and electronic equipment</b>
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
<b>16 06</b>	<b>batteries and accumulators</b>
16 06 04	alkaline batteries (except 16 06 03)
16 06 05	other batteries and accumulators
<b>20</b>	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
20 01 34	batteries and accumulators other than those mentioned in 20 01 33
20 01 36	discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35

<b>Table S2.4 Permitted waste types and quantities for activities AR3 and AR10</b>	
<b>Maximum quantity</b>	<b>The total waste accepted at site for all activities will not exceed 75,000 tonnes per year. Consisting of no more than 35,000 tonnes of hazardous waste.</b>
<b>Waste code</b>	<b>Description</b>
<b>09</b>	<b>Wastes from the photographic industry</b>
<b>09 01</b>	<b>wastes from the photographic industry</b>
09 01 01*	water-based developer and activator solutions
09 01 02*	water-based offset plate developer solutions
09 01 04*	fixer solutions
09 01 05*	bleach solutions and bleach fixer solutions
09 01 06*	wastes containing silver from on-site treatment of photographic wastes
<b>13</b>	<b>Oil wastes and wastes of liquid fuels (except edible oils, and those in chapters 05, 12 and 19)</b>
<b>13 01</b>	<b>waste hydraulic oils</b>
13 01 09*	mineral-based chlorinated hydraulic oils
13 01 10*	mineral based non-chlorinated hydraulic oils
13 01 11*	synthetic hydraulic oils
13 01 12*	readily biodegradable hydraulic oils
13 01 13*	other hydraulic oils
<b>13 02</b>	<b>waste engine, gear and lubricating oils</b>
13 02 04*	mineral-based chlorinated engine, gear and lubricating oils
13 02 05*	mineral-based non-chlorinated engine, gear and lubricating oils

<b>Table S2.4 Permitted waste types and quantities for activities AR3 and AR10</b>	
<b>Maximum quantity</b>	<b>The total waste accepted at site for all activities will not exceed 75,000 tonnes per year. Consisting of no more than 35,000 tonnes of hazardous waste.</b>
13 02 06*	synthetic engine, gear and lubricating oils
13 02 07*	readily biodegradable engine, gear and lubricating oils
13 02 08*	other engine, gear and lubricating oils
<b>13 04</b>	<b>bilge oils</b>
13 04 01*	bilge oils from inland navigation
13 04 02*	bilge oils from jetty sewers
13 04 03*	bilge oils from other navigation
<b>13 07</b>	<b>wastes of liquid fuels</b>
13 07 01*	fuel oil and diesel
13 07 03*	other fuels (including mixtures)
<b>15</b>	<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>
<b>15 02</b>	<b>absorbents, filter materials, wiping cloths and protective clothing</b>
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
16 01 07*	oil filters
16 01 13*	brake fluids
16 01 14*	antifreeze fluids containing hazardous substances
<b>16 02</b>	<b>wastes from electrical and electronic equipment</b>
16 02 13*	discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12
<b>16 05</b>	<b>gases in pressure containers and discarded chemicals</b>
16 05 04*	gases in pressure containers (including halons) containing hazardous substances
<b>20</b>	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
20 01 21*	fluorescent tubes and other mercury-containing waste

<b>Table S2.5 Permitted waste types and quantities for activities AR9 and AR10</b>	
<b>Maximum quantity</b>	<b>The total waste accepted at site for all activities will not exceed 75,000 tonnes. Consisting of no more than 40,000 tonnes of non hazardous waste.</b>
<b>Waste code</b>	<b>Description</b>
<b>09</b>	<b>Wastes from the photographic industry</b>
<b>09 01</b>	<b>wastes from the photographic industry</b>

<b>Table S2.5 Permitted waste types and quantities for activities AR9 and AR10</b>	
<b>Maximum quantity</b>	<b>The total waste accepted at site for all activities will not exceed 75,000 tonnes. Consisting of no more than 40,000 tonnes of non hazardous waste.</b>
09 01 07	photographic film and paper containing silver or silver compounds
09 01 10	single-use cameras without batteries
<b>15</b>	<b>Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified</b>
<b>15 02</b>	<b>absorbents, filter materials, wiping cloths and protective clothing</b>
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
<b>16</b>	<b>Wastes not otherwise specified in the list</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
16 01 17	ferrous metal
16 01 18	non-ferrous metal
<b>16 02</b>	<b>wastes from electrical and electronic equipment</b>
16 02 14	discarded equipment other than those mentioned in 16 02 09 to 16 02 13
<b>16 08</b>	<b>spent catalysts</b>
16 08 01	spent catalysts containing gold, silver, rhenium, rhodium, palladium, iridium or platinum (except 16 08 07)
16 08 03	spent catalysts containing transition metals or transition metal compounds not otherwise specified
<b>17</b>	<b>Construction and demolition wastes (including excavated soil from contaminated sites)</b>
<b>17 02</b>	<b>wood, glass and plastic</b>
17 02 01	wood
17 02 02	glass
<b>20</b>	<b>Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions</b>
<b>20 01</b>	<b>separately collected fractions (except 15 01)</b>
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 01 40	metals

## Schedule 3 – Emissions and monitoring

<b>Table S3.1 Point source emissions to sewer, effluent treatment plant or other transfers off-site–emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
W1 discharge to the public surface water system as shown on plan titled Site Plan – Water Management System dated February 2017	Uncontaminated rainwater	No parameters set	No limit set	-	-	-
W2 as shown on plan titled Site Plan – Water Management System dated February 2017	Effluent treatment plant including contaminated rainwater	As per an authorised trade effluent consent	As per an authorised trade effluent consent	-	-	-

## Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
-	-	-	-

<b>Table S4.2: Annual production/treatment</b>	
<b>Parameter</b>	<b>Units</b>
-	-

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Water usage	Annually	tonnes/m <sup>3</sup>
Energy usage	Annually	MWh

<b>Table S4.4 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	07/04/2017
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	07/04/2017
Waste returns	E-Waste Return Form	-

# Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	



<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2010 No.675 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“pests” means birds, vermin and insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

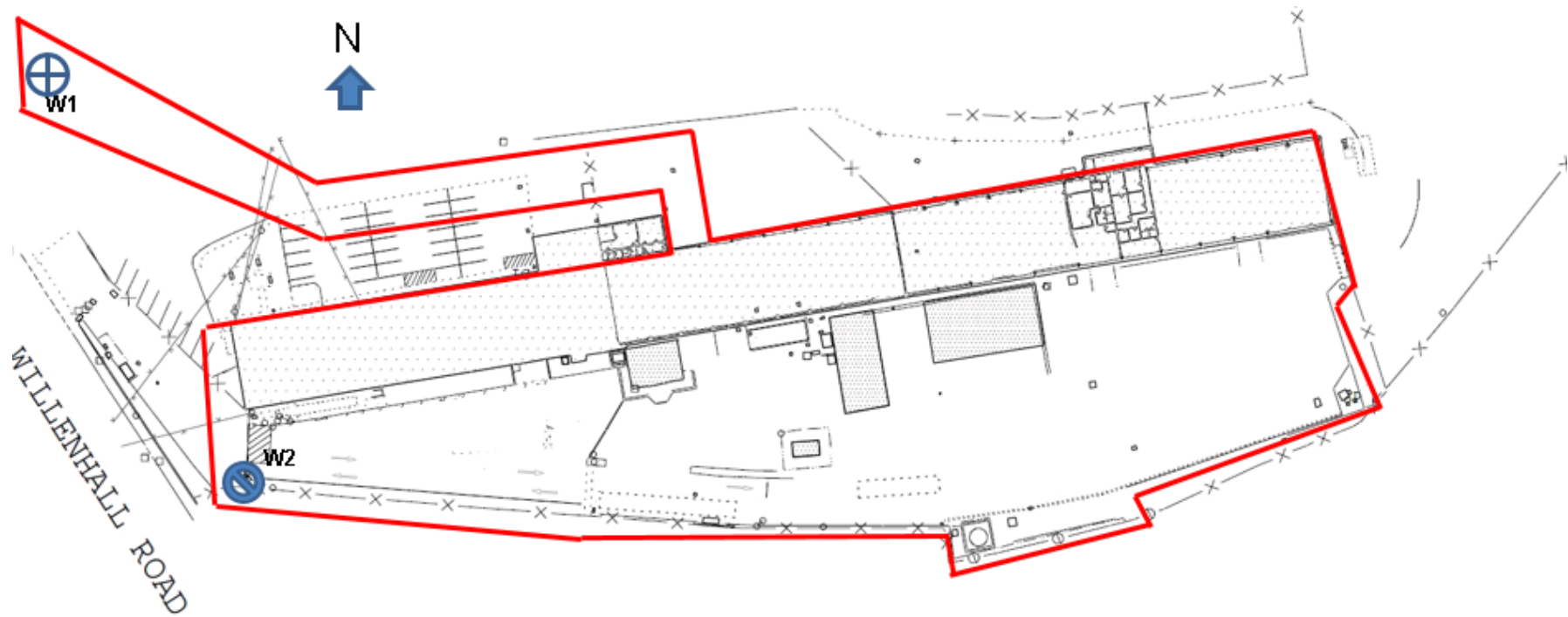
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

“year” means calendar year ending 31 December.

## Schedule 7 – Site plan



END OF PERMIT