

Mr Roy Brunt
Qualitech Environmental Services Ltd
424-436 Haydock Lane
Haydock Industrial Estate,
Haydock,
St Helens,
Merseyside,
WA11 9UJ

**Our Ref: PAN-014090
Other Ref: EPR/BB3397HN**

Date: 30 September 2021

Dear Mr Brunt,

We need more information about your application

**Application Reference: PAN-014090
Operator: Qualitech Environmental Services Ltd
Facility: Sandycroft Waste Management Centre, Prince William Avenue
Sandycroft, Deeside, CH5 2PX**

Thank you for your application, submitted to us on 7 May 2021. Unfortunately, we need to ask you for some more details before we can consider duly making your application. The additional information required is summarised below.

Activity being applied for

It is not clear within your application exactly what activity you are applying to add to your permit. There are a number of inconsistencies within the application which require clarification. You have indicated you wish to apply to add 147 EWC codes to your permit, and that this would fall as a Directly Associated Activity to Section 5.6 Part A (1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending the above Section 5.3 activities. However, the wastes you wish to add are non-hazardous wastes, which indicates you wish to add a new waste activity to your permit.

You have also indicated that the additional waste streams would not increase your total current annual throughput of 30,000 tonnes per annum (as stated on Form C2 Q2b), however on form C3 Table 1a you have indicated a proposed total annual throughput capacity of 40,100 tonnes.

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Please confirm what activity you are applying for, and the intended daily and annual throughput tonnages as well as total storage capacities for each of the activities proposed and associated waste streams to be accepted onto site.

Application Forms

The application forms C2, C3 and F1 have not been completed correctly, with either some questions not having been answered, or supporting information not enclosed in support of your application.

Please provide updated application forms and additional supporting information, paying particular attention to the missing or insufficient information described in more detail within Appendix 1, provided at the end of this letter.

Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application and fee.

If you email or write to us, please quote the application reference **PAN-014090** on any correspondence and send it to the relevant address below. When we receive the missing items, we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application, we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions, please email me at Lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

cc. Bryan Foster bryan@qualitechservices.co.uk

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Appendix 1 – Elements of your application which are missing or insufficient

Determination of an application is difficult in the absence of key information. The following summary provides additional information as to why the issues identified within the letter above prevent us from duly making your application. The points listed below may be used as a guide for the missing information required, however addressing them does not guarantee a permit variation application will be successful. You should still thoroughly review your entire application before submitting the additional information requested. Further assessment would take place during permit determination and additional information may still be requested:

Form C2

- **Q2b.** We require a more detailed **non-technical summary** description of all the proposed changes you are applying for within your variation application, specifically clarifying what activity you are applying to add to your permit and clarification of the maximum storage capacity, daily and annual throughput capacities for each regulated activity. You should also indicate if the changes proposed require additional infrastructure on site, including suitable designated storage areas with secondary containment.
- **Q3b2.** We require you to provide a copy of your **WAMITAB Certificate** and Continued Competency Certificate (where applicable) in support of this application.
- **Q3d3.** We require you to submit a summary of your **Environmental Management System (EMS)** in support of this application.
- **Q5a.** The **site plans** provided in support of your application contain insufficient detail. In particular the site boundary plan does not include a clear permit boundary line, with all emission points clearly labeled. The site layout plan does not clearly identify designated storage areas for separate waste streams, as well as suitable segregation between hazardous and non-hazardous waste streams. Updated plans are required to be submitted.
- **Q6.** You have not provided an **Environment Risk Assessment** which assesses all of the potential impacts from your proposed changes to site operations. An H1 risk assessment (or equivalent) should be undertaken and submitted with your application.

Form C3

- **Q1.** As described above, your response to this question needs to be clarified to ensure consistency in what is being applied for in terms of activity to be added, and tonnages proposed.
- **Q3a.** You need to provide a document describing the operating techniques for the new activities proposed, ensuring the in process controls sufficiently describe how different types and forms of non-hazardous wastes, including liquids, solids, sludges and dusts will be stored, handled and suitably segregated from other non-compatible wastes. Liquids, solids, sludges and dusts are all included in the additional list of wastes that you propose to bring on to site, and the management of the risks presented by each of these new waste streams must be demonstrated.
- **Table 3b** Supporting information referenced within this table have not been included within the application. Please provide the following documents:

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- **Odour Management Plan;**
- **Fire Prevention and Mitigation Plan** (This documents must include details of how you intend to store non-hazardous waste streams in accordance with NRW's FPMP Guidance);
- **Appendix 4.**
- **Appendix 5.** Please provide a more detailed **Process Flow Diagram** (PFD) and site layout plan illustrating in detail the proposed flow of materials through the site, from reception, handling, storage to dispatch. The flow diagram should clearly define the processes proposed for handling different waste streams (hazardous versus non-hazardous wastes, as well as liquids, solids, sludges and dusts) against each activity proposed.

Form F1

- **Q1.** We are unable to confirm if your application fee has been calculated correctly, until you have clarified exactly what activity you are applying for.
Please also submit the **Opra Profile(s)** you have used to determine the Opra Score and subsequent application fee. This table may need to be updated to include reference to any new waste activity to be added to the permit (if appropriate).
- **Q7d** The **declaration** has not been filled in correctly. The form submitted has been signed in the wrong section (currently signed on page 7 which is only to be used for permit transfer applications).
Please resign the form against the declaration tabs provided on page 5, and re-submit the form.

We would refer you to the following standard guidance, which may be relevant in reviewing your application.

<https://naturalresources.wales/media/1224/rgn-4-setting-standards-for-environmental-protection.pdf>

<https://naturalresources.wales/media/2110/how-to-comply-with-your-environmental-permit.pdf>

<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

<https://naturalresources.wales/permits-and-permissions/environmental-permits/guidance-to-help-you-comply-with-your-environmental-permit/?lang=en>

[Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](#)

<https://eippcb.jrc.ec.europa.eu/reference/>

- End -

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