

# How to apply for an environmental permit (Radioactive Substances Activity) Part RSR-F – Charges and declarations



## Guidance notes

### Please read these guidance notes carefully before you fill in the form.

You may also need to refer to our 'Environmental Permitting Charging Scheme and Guidance' (charging scheme guidance) available from our website at [www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme-april-2014](http://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme-april-2014)

Fill in part RSR-F for all applications for a radioactive substances activity.

Where you see the term 'document reference' on the form: give the document references here and send the documents with the application form when you've filled it in.

### Contents

1	Radioactive Substances Activity
2	Working out charges
3	Payment
4	The Data Protection Act 1998
5	Confidentiality and national security
6	Declaration
7	Application checklist
8	Where to send your application
	Annex 1

## 1 Radioactive Substances Activity

This question is not relevant to applications relating to nuclear sites, nor to applications for transfer or surrender. Radioactive Substances Activity Reference 1.2.1 to 1.2.9 are described in our charging scheme and guidance (available at [www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme-april-2014](http://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme-april-2014)). To distinguish between Radioactive Substances Activity References 1.2.7 and 1.2.8, you will need to do a calculation as set out in the annex to these notes.

## 2 Working out charges

2a There is no charge for an administrative only variation. Examples of these are given in the charging scheme guidance.

2b and 2c

All other applications relating to:

- a radioactive substances activity on a nuclear licensed site
- the disposal of solid low level radioactive waste (including high-volume very low level waste) to land (either at a conventional landfill site or at a dedicated radioactive waste disposal site)

are charged on a time and materials basis. We will invoice you quarterly in arrears. See the charging scheme guidance for more details.

### Table

If your application doesn't fall into any of the above categories, fill in the table.

- Enter the appropriate Radioactive Substances Activity Reference 1.2.1 to 1.2.9. See the charging scheme guidance for definitions.
- Enter the application type – new, variation (administrative only, minor or normal), transfer or surrender. For applications for surrender where activities have not been put into operation and so the charging scheme provides for a reduced fee, enter 'surrender – not commenced'.
- Enter the appropriate charge as listed in the charging scheme guidance.

2d Examples of minor variations are given in the charging scheme guidance. If you are claiming the reduced charge, give your reasons.

## 3 Payment

You must pay any applicable charge at the time you make your application, using one of the methods set out in this section of the form. We will not send you an invoice to cover this charge, as we have done, on request, in the past, because:

- we are determined to reduce the costs of our regulatory processes
- providing ad-hoc, manual invoices for application charges takes us time and costs us money

We are aware that some of our customers:

- have relied on our application charge invoices to provide an adequate financial audit trail and as a prompt for their Finance department to pay those charges
- believe that an invoice is necessary to satisfy their VAT obligations

All our permit charges fall outside the scope of VAT, although we are required to include our VAT registration number on all our invoices. We believe that a copy of this part of the application form, with your completed assessment of the relevant charge, will be sufficient to provide suitable, documented evidence of the need to pay.

We are confident that the payment methods offered will provide you with a suitable range of options. By law, we must recover the costs of our work and we can't begin work on applications until we have been paid.

We will continue to raise permit subsistence charges by issuing system generated invoices to permit holders at the start of each financial year.

Select the method you will use to pay your application charge and follow the appropriate instructions on the form.

### **Information on charges**

We consult widely on changes to our charging schemes and tariffs, which require government approval before being implemented. You can access further information about the basis of our charges, our consultation processes and any current or recent consultations from our website at [www.gov.uk/government/collections/environment-agency-charging-schemes](http://www.gov.uk/government/collections/environment-agency-charging-schemes).

## **4 The Data Protection Act 1998**

Make sure you understand how we will use the information you provide to us.

## **5 Confidentiality and national security**

If you think any of the information in your application and supporting documents is confidential, tick the box and provide supporting evidence to enable us to determine your claim. The tests for confidential information are:

- it is commercial or industrial information
- its confidentiality is provided by law to protect a legitimate economic interest
- in all the circumstances, the public interest in maintaining the confidentiality of the information outweighs the public interest in including it on the register

We cannot exclude information that relates to emissions from the public register.

If you think any of the information in your application and supporting documents should be withheld from the public register in the interests of national security (other than because your application relates to sealed sources), tick the box and provide confirmation that you have given notice of this to the Secretary of State (if your premises are in England) or Welsh Ministers (if your premises are in Wales).

## **6 Declaration**

Ensure a relevant person makes the declaration. A relevant person is:

- for an organisation of individuals, one of those individuals (for example, one of the partners in a partnership)
- for a company or other corporate body, one of the officers of the organisation (for example, a director or company secretary), or an employee who has been authorised to make applications on behalf of the organisation
- for a limited liability partnership, one of the partners

## **Transfer applications**

For permit transfers, both the permit holder and the person receiving the permit must make the declaration.

## **7 Application checklist (You must fill in this section)**

Tell us what you have sent with your application form.

You must include the correct application fee, or evidence of payment, if you filled in the table in section 2 of this part of the form.

Where you have referenced supporting documents in the application questions you've answered, list them in the table. Under 'question reference', specify the form part and the question number (for example, RSR-A 7c). If you are submitting your application electronically, the filename of any supporting document should include the document reference that you have specified here and against the relevant question.

## **8 Where to send your application**

Please send all parts of your filled-in application form and supporting documents to the address specified on the form.

If your application relates to sealed sources, do not send it by email. Send a paper copy in a sealed envelope (do not mark the envelope 'restricted'), either by courier or by post using 'Royal Mail Special Delivery Next Day'.

Usually, you only need to send one copy of your application. For complex nuclear site applications, we may ask you for additional copies.

## Annex 1

### RSR COMPLEXITY METHODOLOGY

#### Deciding whether an unsealed sources permit is high complexity

If you undertake any of the following radioactive substances activities then the permit reference is 1.2.8 (keeping or use of unsealed radioactive sources and subsequent disposal of radioactive waste – high complexity).

- production of radioactive substances (such as in a cyclotron)
- manufacture of gaseous tritium light devices or sources
- disposal of radioactive waste arising from the onshore production of oil and gas not within the confines of a standard rules permit
- receiving radioactive waste for the purposes of treatment and/or disposal, or
- If the disposal ratio as calculated using the RSR complexity methodology is greater than 30000

To calculate the disposal ratio for your permit please follow the steps below:

1. For each radionuclide or group of radionuclides intended to be listed in the permit identify the Band or Group from Table 1.
2. Use the annual limit (in Bq) specified in the application for the calculation. If working out charging for existing permits which have no annual limit specified use 12 times monthly limit or 52 times weekly.
3. In Table 2 look up the value (in Bq) for each band or group and disposal route required for the permit (sewer, water or air).
4. Divide the value from 2 by the value from 3 to calculate the ratio of annual permitted discharge limit to the appropriate value for sewer, water or air. Do this for each radionuclide and group of radionuclides for all discharge routes and add up results.
5. The total is the value to be compared with 30000.
6. Do not include transfers of radioactive waste in calculations.

Example:

Proposed annual limits: H-3 30 GBq to air and P-32 40 GBq to sewer

H-3 is Band 3; Table 2 value for Band 3 to air is 1E10. Ratio for 30 GBq = 3

P-32 is Band 2; Table 2 value for Band 2 to sewer is 1E7. Ratio for 40 GBq = 4000

Sum of ratios = 4003

This is less than 30000

**Table 1**

Radionuclides	Band or Group
Actinium 225	Band 2
Actinium 227	Band 2
Americium 241	Band 2
Americium 241:Beryllium	Band 2
Americium 243	Band 2
Antimony 122	Band 3
Antimony 124	Band 3
Antimony 125	Band 3
Argon 41	Band 3
Arsenic 76	Band 3
Astatine 211	Band 3
Barium 133	Band 1
Barium 137m	Band 3
Beryllium 7	Band 3
Bismuth 204	Band 3
Bismuth 205	Band 3
Bismuth 206	Band 3
Bismuth 210	Band 1
Bromine 76	Band 2
Bromine 77	Band 2

Radionuclides	Band or Group
Bromine 82	Band 2
Cadmium 109	Band 1
Caesium 134	Band 1
Caesium 135	Band 2
Caesium 137	Band 1
Calcium 41	Band 2
Calcium 45	Band 2
Californium 252	Band 1
Carbon 11	Band 3
Carbon 14	Band 3
Carbon 14 and Hydrogen 3	Group 1
Carbon 14, Hydrogen 3, Iodine 125, Phosphorus 32 and Sulphur 35	Group 2
Cerium 141	Band 2
Cerium 144	Band 2
Chlorine 36	Band 2
Chromium 51	Band 3
Cobalt 55	Band 3
Cobalt 56	Band 1
Cobalt 57	Band 2

Radionuclides	Band or Group
Cobalt 58	Band 2
Cobalt 60	Band 1
Copper 61	Band 3
Copper 64	Band 3
Copper 67	Band 2
Curium 242	Band 2
Curium 243	Band 2
Curium 244	Band 2
Erbium 169	Band 3
Erbium 171	Band 3
Europium 152	Band 1
Europium 152m	Band 3
Europium 154	Band 1
Fluorine 18	Band 3
Gadolinium 148	Band 2
Gadolinium 153	Band 2
Gallium 67	Band 3
Gallium 68 / Germanium 68 (Ge-68 Generator)	Band 2
Germanium 68	Band 2
Germanium 69	Band 3
Gold 198	Band 2
Holmium 166	Band 1
Hydrogen 3	Band 3
Indium 111	Band 2
Indium 113m	Band 2
Iodine 120	Band 3
Iodine 123	Band 3
Iodine 124	Band 2
Iodine 125	Band 3
Iodine 129	Band 2
Iodine 131	Band 2
Iodine radionuclides	Group 3
Iridium 192	Band 2
Iron 52	Band 3
Iron 55	Band 2
Iron 59	Band 2
Krypton 79	Band 3
Krypton 81	Band 3
Krypton 85	Band 3
Lanthanum 140	Band 2
Lead 210	Band 1
Lutetium 177	Band 3
Manganese 52	Band 2
Manganese 54	Band 2
Manganese 56	Band 3
Mercury 203	Band 3
Molybdenum 99 / Technetium 99m (Tc-99m Generator)	Band 3
Neptunium 237	Band 2
Nickel 59	Band 2

Radionuclides	Band or Group
Nickel 63	Band 3
Nitrogen 13	Band 3
Oxygen 15	Band 3
Palladium 103	Band 3
Phosphorus 32 and Phosphorus 33	Group 6
Phosphorus 32	Band 2
Phosphorus 33	Band 2
Plutonium 238	Band 2
Plutonium 239	Band 2
Plutonium 240	Band 2
Plutonium 241	Band 3
Plutonium 242	Band 2
Polonium 208	Band 2
Polonium 210	Band 1
Potassium 40	Band 3
Potassium 42	Band 3
Promethium 147	Band 3
Protactinium 231	Band 1
Radium 223	Band 2
Radium 224	Band 1
Radium 226	Band 1
Radium 228	Band 1
Radon 222	Band 3
Rhenium 186	Band 2
Rhenium 188	Band 3
Rubidium 81 / Krypton 81m (Kr-81m Generator)	Band 2
Rubidium 81m	Band 2
Rubidium 82	Band 2
Rubidium 82m	Band 2
Rubidium 84	Band 2
Rubidium 86	Band 2
Ruthenium 103	Band 2
Ruthenium / Rubidium 106	Group 6
Samarium 151	Band 2
Samarium 153	Band 3
Scandium 46	Band 2
Scandium 47	Band 3
Selenium 75	Band 1
Silver 110m	Band 2
Sodium 22	Band 2
Sodium 24	Band 2
Strontium 82 / Rubidium 82 (Rb-82 Generator)	Band 2
Strontium 83	Band 2
Strontium 85	Band 2
Strontium 89	Band 3
Strontium 90	Band 2
Sulphur 35	Band 3
Tantalum 182	Band 2
Technetium 94	Band 3
Technetium 99	Band 3

Radionuclides	Band or Group
Technetium 99m	Band 3
Thallium 201	Band 3
Thallium 204	Band 1
Thorium – Natural	Group 4
Thorium 227	Band 2
Thorium 228	Band 1
Thorium 229	Band 2
Thorium 230	Band 2
Thorium 232	Band 1
Thulium 170	Band 2
Tin 113	Band 2
Tin 117m	Band 2
Tin 119m	Band 2
Tin 121	Band 3
Tin 121m	Band 2
Tin 125	Band 3
Total alpha radionuclides	Group 5
Total beta/gamma (t1/2 <1 day)	Group 6
Total beta/gamma (t1/2 10 days-1 y)	Group 6
Total beta/gamma (t1/2 1-10 days)	Group 6
Total beta/gamma nuclides	Group 6
Total positron nuclides	Group 7
Total radionuclides	Group 8
Uranium – Depleted	Group 9
Uranium – Natural	Group 9
Uranium 232	Band 2
Uranium 233	Band 2
Uranium 234	Band 2
Uranium 235	Band 2
Uranium 236	Band 2
Uranium 238	Group 10
Vanadium 48	Band 2
Xenon 133	Band 3
Ytterbium 169	Band 3
Ytterbium 175	Band 3
Yttrium 86	Band 3
Yttrium 88	Band 3
Yttrium 90	Band 3
Zinc 62	Band 2
Zinc 65	Band 2
Zirconium 89	Band 3
Zirconium 95	Band 3

**Table 2**

Band or Group	Sewer	Water	Air
Band 1	1.00E+05	1.00E+07	1.00E+06
Band 2	1.00E+07	1.00E+07	1.00E+08
Band 3	1.00E+09	1.00E+10	1.00E+10
Group 1	1.00E+08	1.00E+08	1.00E+10
Group 2	1.00E+08	1.00E+08	1.00E+10
Group 3	1.00E+08	1.00E+08	1.00E+08
Group 4	1.00E+05	1.00E+07	1.00E+06
Group 5	1.00E+05	1.00E+07	1.00E+06
Group 6	1.00E+06	1.00E+07	1.00E+08
Group 7	1.00E+09	1.00E+10	1.00E+11
Group 8	1.00E+05	1.00E+07	1.00E+06
Group 9	1.00E+11	1.00E+12	1.00E+12
Group 10	1.00E+08	1.00E+08	1.00E+07