

Sach, Kerry

From: Jennifer Stringer <StringerJ@rpsgroup.com>
Sent: 24 March 2023 15:19
To: Harris, Craig
Cc: Clare Haste; Joanna Bruce
Subject: RE: EPR/ZP3691ET SIMS Smethwick
Attachments: 230323 R JER9144 JB Sims Smethwick BAT Assessment V2 R1.pdf

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Craig

Please see attached BAT assessment relating to the variation to include the reclassified wastes.

I understand that the application consultation has been ongoing, have there been any responses received to date?

Regards

Jennifer

Jennifer Stringer

Technical Director
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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Sent: 13 March 2023 07:29
To: Jennifer Stringer <StringerJ@rpsgroup.com>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

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Hi Jennifer

Yes I will agree to that.

Many Thanks

Kind regards,

**Craig Harris BSc (Hons), BA (Hons), PER
Permitting Officer
Environment Agency - East Midlands**

 07770 323461



 Craig.Harris@environment-agency.gov.uk

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From: Jennifer Stringer <StringerJ@rpsgroup.com>
Sent: 10 March 2023 16:26
To: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Cc: Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

Craig

We are working on the BAT assessment, but the 17th is very tight as we need to complete the assessment and allow for Client review and Clare has limited availability next week. Would it be possible to agree a compromise and submit on the 24th.

Thanks

Jennifer

Jennifer Stringer

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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Sent: 08 March 2023 08:12
To: Jennifer Stringer <StringerJ@rpsgroup.com>
Cc: Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

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Hi Jennifer,

The consultation (20 working days) would finish on the 30th March. However this information should have actually been part of the duly making stage and the earlier we can technically assess the BAT conclusions the quicker we can come to a conclusion

For this reason I would prefer that these are received earlier than the 31st March.

Provide these by 17th March . Please give me a call if you would like to discuss.

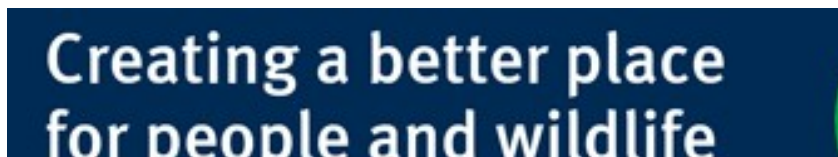
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From: Jennifer Stringer <StringerJ@rpsgroup.com>
Sent: 06 March 2023 09:48
To: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

Hi Craig

We will aim to provide the BAT assessment by the end of this month (31st March). I trust this is acceptable.

Regards

Jennifer

Jennifer Stringer

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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Sent: 27 February 2023 15:09
To: Jennifer Stringer <StringerJ@rpsgroup.com>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

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Hi Jennifer

Yes I discussed that with Francis this morning.

If we schedule 5 the request for information it becomes legal and doesn't give us much room for flexibility. We do however need to be confident that we can obtain the information in reasonable time without the schedule 5. As you say let me know when you have spoken to Claire.

Thanks Jennifer

Kind regards,

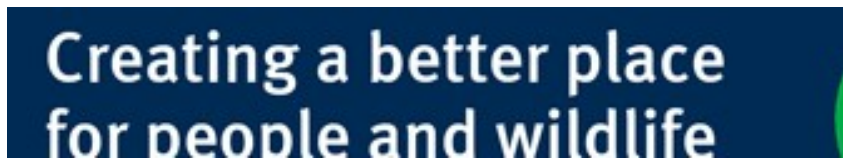
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From: Jennifer Stringer <StringerJ@rpsgroup.com>
Sent: 27 February 2023 13:56
To: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

Craig

Clare was on leave at the end of last week and I haven't managed to catch up with her yet today.

I understand from Francis that you no longer want to Schedule 5 this as per your email but will just need a response form us. I will let you know when I have spoken to Clare.

Regards

Jennifer

Jennifer Stringer

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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Sent: 27 February 2023 13:38
To: Jennifer Stringer <StringerJ@rpsgroup.com>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

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Hi Jennifer

Hope you are well. I've just caught up with Francis. Did you manage to have a conversation with Claire Haste regarding the waste BAT conclusions ?

Kind regards,

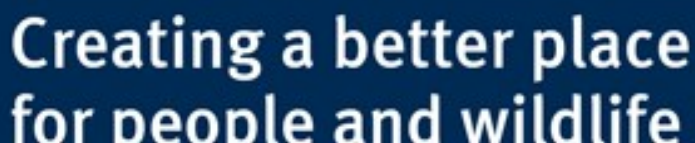
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From: Jennifer Stringer <StringerJ@rpsgroup.com>
Sent: 24 February 2023 10:23
To: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Cc: Clare Haste <clare.haste@simsmm.com>; Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

Craig

It would be really very helpful to discuss this with you, if you could let me know when is convenient please.

We will be unable to respond with the additional BAT requirements by close of play today and therefore request that you issue a Schedule 5 notice as per your email below.

In respect of the ERA, the NTS makes reference to a copy of the risk assessment being provided with the application, this is included in the supporting letter Section 3 and sets out the position on the changes to the effects compared to the original submitted ERA. For the reasons set out in Section 3 the conclusion is there is no significant change to the overall risk.

Regards

Jennifer

Jennifer Stringer

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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Sent: 20 February 2023 08:06
To: Jennifer Stringer <StringerJ@rpsgroup.com>
Cc: Clare Haste <clare.haste@simsmm.com>; Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

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Morning Jennifer,

In terms of timescales happy to give you an extension to end of play Friday 24th February.

Kind regards,

Craig Harris BSc (Hons), BA (Hons), PER

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From: Jennifer Stringer <StringerJ@rpsgroup.com>

Sent: 16 February 2023 15:26

To: Harris, Craig <Craig.Harris@environment-agency.gov.uk>

Cc: Clare Haste <clare.haste@simsmm.com>; Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>

Subject: RE: EPR/ZP3691ET SIMS Smethwick

Hi Craig

Thanks for the update and I note your comments which are contrary to the advice we have been given previously by the EA where variations are submitted following issue of the BAT conclusions. However, if there are other BAT to consider then I will discuss with Clare alongside the ERA.

In terms of timescales as you will note I am currently on leave returning Monday leaving only 2 days to respond. Could I request we agree an extension to this as it will be insufficient time to address your request.

Regards

Jennifer

Jennifer Stringer

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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>

Sent: 16 February 2023 13:46

To: Jennifer Stringer <StringerJ@rpsgroup.com>

Cc: Clare Haste <clare.haste@simsmm.com>; Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>

Subject: FW: EPR/ZP3691ET SIMS Smethwick

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Hi Jennifer,

We do not agree that the new activity only needs to be assessed against BAT 4 of waste Treatment BAT conclusions. You will need to consider all of the relevant BATs in the Waste Treatment conclusions that is applicable to your new activity. We need this to progress your application to the next determination stage. BAT assessment is required for all new processes and installation operations.

The operator techniques and the additional document you provided in response to the Not Duly Made request are not comprehensive and do not cover full BAT assessment.

We appreciate that some of the BATs may not be applicable but we still need to consider and state that, that is the case. There are range of BATs that are applicable to the proposed activity that you have not considered. For example BAT 5 considers handling and transfer procedures with the aim to ensure that wastes are safely handled and transferred to the respective storage or treatment. Again, BAT 14 covers diffuse emissions to air which may result from the shredding operations of the hazardous WEEE activity.

Note that your existing permit is not yet reviewed against the provisions of the Waste Treatment BAT Conclusions. Some of the limits in your current permit is out of date with the BAT requirements. For example Table S3.1 of your permit has point source emissions limits of 20mg/m³ for total suspended particulates against 5mg/m³ that is now required under BAT 25.

We have noted that you want to keep the Reg 61 response separate. However, we need an equivalent document that covers full BAT assessment to progress this application. If you chose not to provide it at this stage, we will formally request it using Schedule 5 Notice at a later date but we want you to be aware that this will cause a delay to the overall determination timescale.

In addition:

We need you to provide a copy of the updated risk assessment that you mentioned in your Non-technical Summary. You stated in the NTS that 'A copy of the risk assessment has been included with the application'. We cannot find this in our records.

We need you to provide the BAT assessment and risk assessment documents to us on or before 22/02/2023.

Thankyou.

Kind regards,

Craig Harris BSc (Hons),BA (Hons),PER
Permitting Officer
Environment Agency - East Midlands

 07770 323461



 Craig.Harris@environment-agency.gov.uk

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From: Jennifer Stringer <StringerJ@rpsgroup.com>
Sent: 14 February 2023 18:39
To: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Cc: Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>; Clare Haste <clare.haste@simsmm.com>
Subject: RE: EPR/ZP3691ET SIMS Smethwick

Hi Craig

As previously raised on the call we would prefer to keep the Reg 61 and the variation separate. AS I understand post issue of the BAT conclusions any variation needs to meet BAT in so far as they relate to the varied activities only. The existing activities are not being varied it is only the introduction of the storage and treatment of hazardous waste that is being applied for here and hence we addressed BAT 4.

On a separate matter we do not appear to have received an update on whether the application has been duly made. We understood that the outstanding issue of Technical Competence was now satisfied.

Regards

Jennifer

Jennifer Stringer

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From: Harris, Craig <Craig.Harris@environment-agency.gov.uk>
Sent: 14 February 2023 13:46
To: Jennifer Stringer <StringerJ@rpsgroup.com>
Cc: Nwafor, Francis <francis.nwafor@environment-agency.gov.uk>; Clare Haste <clare.haste@simsmm.com>
Subject: EPR/ZP3691ET SIMS Smethwick

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Hi Jennifer,

We are considering the Sims application in line with BAT conclusions for waste and appropriate measures. The operating techniques provided, as you have stated have covered BAT 4.

We require a full assessment against the BAT conclusions which I believe you have already carried out for your reg 61 submission. Are you happy for us to use the reg 61 as your full assessment ?.

Many Thanks

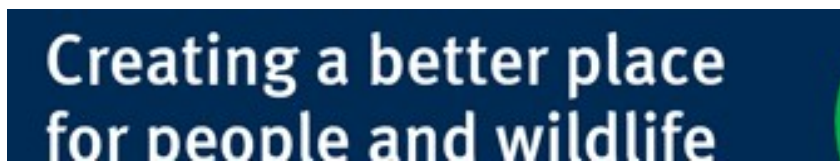
Kind regards,

**Craig Harris BSc (Hons), BA (Hons), PER
Permitting Officer
Environment Agency - East Midlands**

 07770 323461

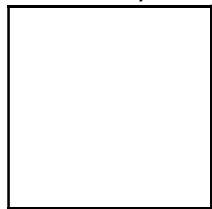
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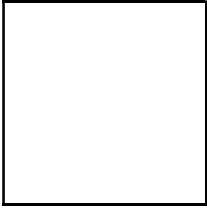
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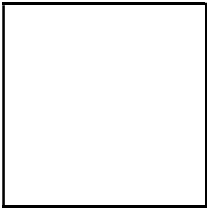
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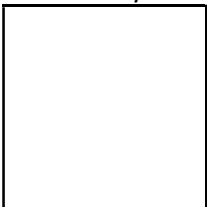
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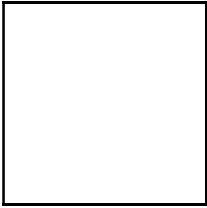
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