

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

City Batteries Limited

City Batteries Limited

Albion Yard

Manor Road

Erith

Kent

DA8 2AD

Variation application number

EPR/GB3701SW/V003

Permit number

EPR/GB3701SW

City Batteries Limited

Permit number EPR/GB3701SW

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. All the conditions of the permit have been varied and are subject to the right of appeal.

The installation will operate under the following activities listed in Schedule 1 of the EP Regulations:

- S5.3 A(1)(a)(ii) – disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day by physico chemical treatment consisting of treatment of hazardous batteries via piercing, draining and breaking.
- S5.3 A(1)(a)(ii) – disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day by physico-chemical treatment consisting of treatment of hazardous battery cases via shredding.
- S5.3 A(1)(a)(iv) – disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day consisting of repackaging of hazardous batteries.
- 5.6 A(1)(a) – temporary storage of hazardous waste with a total capacity exceeding 50 tonnes at any one time.

The following are Directly Associated Activities to the battery treatment:

- Sorting and separation of hazardous waste batteries.
- Storage of waste acid from the battery treatment activity.
- Storage of lead plates from the battery treatment activity.
- Storage of shredded plastic cases from the battery treatment activity.
- Storage of potentially contaminated wash-down waters and surface run-off.

The following waste operation also forms part of the permit:

- Size reduction (through cutting), storage and bulking up of non-hazardous waste metals.

This permit variation V003 has been issued to increase the amount of hazardous waste stored on site at any one time to 200 tonnes and an annual throughput limit of no more than 17,000 tonnes per year.

The installation is located in Erith, 4km north west of Dartford, at National Grid Reference TQ 52021 77746. The surrounding area is residential to the west and commercial and industrial to the east.

The installation receives and treats hazardous waste lead acid batteries (16 06 01*) by piercing to drain acid prior to breaking of the plastic casing to separate out the component parts. The lead plates are bulked up for transfer off site and the plastic casings are shredded then bulked up for transfer off site.

Nickle-cadmium batteries (16 06 03*), mercury-containing batteries (16 06 03*) and municipal batteries and accumulators (20 01 33*) are received for bulking up and storage only prior to transfer off site.

The site also receives waste metal (under a waste operation) for size reduction by manual cutting, bulking up and storage prior to onward recovery or disposal.

The site surfacing consists of a concrete surface with a sealed drainage system for the collection of wash down water and surface run-off.

Battery acid and contaminated wash down water is collected in an underground storage tank. When full, the content is pumped into one of the two integrally bundled above ground storage tanks located outside the entrance to the breaking shed. Surface run-off in the yard is collected in a sealed drainage system and removed from site by tanker.

There are no point source emissions from the installation.

There is one Site of Special Scientific Interest (SSSI) and 15 Local Wildlife Sites within 2km. The site is also within the Bexley Air Quality Management Area.

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.

Status log of the permit		
Description	Date	Comments
Permit Issued EAWML 83233	03/02/1993	Original permit issued to Vinton Metal Recycling. (Alternative reference: DL427)
Modification EAWML 83233	25/03/1997	
Modification EPR/LP3190EG/V002	17/04/2000	
Modification EPR/LP3190EG/V003	17/05/2004	
Environment Agency initiated variation EPR/LP3190EG/V004	31/03/2014	Variation to insert conditions required by Article 3 of Regulation (EU) No 493/2012.
Application EPR/GB3701SW/T001 (full transfer of permit EPR/LP3190EG)	Duly made 16/11/2018	Application to transfer the permit in full to City Batteries Limited.
Transfer determined EPR/GB3701SW	10/12/2018	Full transfer of permit complete. Effective date of notice 01/01/2019.
Application EPR/GB3701SW/V002 (variation and consolidation)	Duly made 13/12/2018	Application to vary and update the permit to a multi-regime permit in accordance with IED.
Additional information received	19/02/2019	Email providing confirmation of the EWC codes and listed activities.
Additional information received	02/04/2019	Response to Schedule 5 Notice sent on 01/04/2019.
Additional information received	09/04/2019	Response to email following up on Schedule 5 response clarifying the construction of the storage warehouse and drainage system layout.
Additional information received	13/05/2019 and 22/05/2019	Responses to Schedule 5 Notice sent on 01/05/2019.
Variation determined EPR/GB3701SW (Billing References: YP3638QM and EAWML 83233)	16/07/2019	Varied permit issued.

Status log of the permit		
Description	Date	Comments
Application received EPR/GB3701SW/V003	Dulymade 13/05/2025	Application for an increase in the amount of hazardous storage on site at any one time, and for an increase in the annual throughput.
Additional information received	15/07/2025	Response to Schedule 5 Notice sent on 17/06/2025, regarding the site Fire Prevention Plan, site drainage and BAT Assessment.
Additional information received	22/08/2025	Email providing confirmation and clarification of the date for installing the sprinklers, infrared cameras and tanks. It also contains details about the two fire hydrants and current CCTV on site.
Additional information received	03/09/2025	Email providing an updated site plan, updated BAT conclusion and details regarding the site's drainage and interceptor.
Additional information received	03/10/2025	Email providing an updated Part C3 Form.
Variation determined EPR/GB3701SW/V003	23/10/2025	Varied and consolidated permit issued in modern condition format

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 and consolidates

Permit number

EPR/GB3701SW

Issued to

City Batteries Limited ("the operator")

whose registered office is

**Albion Yard
Manor Road
Erith
Kent
DA8 2AD**

company registration number 11355830

to operate an installation and waste operation at

**City Batteries Limited
Albion Yard
Manor Road
Erith
Kent
DA8 2AD**

to the extent set out in the schedules.

The notice shall take effect from 23/10/2025

Name	Date
Peter Maksymiw	23/10/2025

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/GB3701SW

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/GB3701SW/V003 authorising,

City Batteries Limited ("the operator"),

whose registered office is

Albion Yard

Manor Road

Erith

Kent

DA8 2AD

company registration number 11355830

to operate an installation and waste operation at

City Batteries Limited

Albion Yard

Manor Road

Erith

Kent

DA8 2AD

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

Name	Date
Peter Maksymiw	23/10/2025

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.

1.2 Energy efficiency

- 1.2.1 For the following activities referenced in schedule 1, table S1.1, AR1 to AR11, 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 AR11, 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”).
- 2.1.2 For the following activities referenced in schedule 1, table S1.1, AR1 to AR12, waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

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

2.3 Operating techniques

- 2.3.1 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 All activities shall take place on impermeable surfaces with sealed drainage, unless otherwise specified in Table S1.1 or agreed in writing with the Environment Agency.
- 2.3.4 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.5 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3 or S2.4; and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.6 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.
- 2.3.7 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.

2.4 Waste battery and accumulator treatment

- 2.4.1 Treatment of waste batteries and accumulators must meet the minimum requirements set out in Annex III, Part A of Directive 2006/66/EC of the European Parliament and of the Council on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC.

2.5 Hazardous waste storage and treatment

- 2.5.1 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.

2.6 Improvement programme

- 2.6.1 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.
- 2.6.2 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.
- 3.1.2 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.
- 3.1.3 For the following activities referenced in schedule 1, table S1.1 AR1 to AR12. Where a substance is specified in schedule 3 table S3.1 but no limit is set for it, the concentration of such substance in emissions to water from the relevant emission point shall be no greater than the background concentration

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) process monitoring specified in table 3.1
- 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 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 tables 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.

3.7 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 AR12, 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
- (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 one 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.

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) 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 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 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.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and

- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 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
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

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 Battery piercing, draining and dismantling	5.3 A(1)(a)(ii)	R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic materials.	From receipt of hazardous waste lead acid batteries to treatment consisting of piercing batteries to drain acid, breaking and removing the plastic casings and the collection of processed waste components for further processing. Activities shall take place within a building on an impermeable surface with sealed drainage. Waste types suitable for acceptance are limited to those specified in table S2.2. Treatment shall not exceed 30 tonnes per day. Wastes shall be treated or removed off site within a maximum of six months from the date of receipt.
AR2 Plastic shredding	5.3 A(1)(a)(ii)	R4: Recycling/reclamation of metals and metal compounds. R5: Recycling/reclamation of other inorganic materials.	Treatment by shredding of hazardous, lead contaminated, plastic battery casings from activity AR1. Activities shall take place within a building on an impermeable surface with sealed drainage. Waste types suitable for acceptance are limited to those specified in table S2.2. Treatment shall not exceed 5 tonnes per day. Waste shall be treated or removed off site within a maximum of six months from the date of receipt.
AR3 Battery repackaging	5.3 A(1)(a)(iv)	D14: Repackaging prior to submission to any of the operations numbered D1 to D13. 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).	From receipt of hazardous waste batteries to repackaging and subsequent storage pending transfer off-site. Activities shall take place within a building on an impermeable surface with sealed drainage. Batteries must be stored in dedicated, labelled and appropriate containers. Waste types suitable for acceptance are limited to those specified in tables S2.2 and S2.3. Treatment shall not exceed 40 tonnes per day. Wastes shall be treated or removed off site within a maximum of six months from the date of receipt.
AR4	S5.6 A(1)(a)	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding	From receipt and storage of hazardous waste on site to its treatment on site.

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
Hazardous waste storage		temporary storage, pending collection, on the site where it is produced).	Activities shall take within a building on an impermeable surface with sealed drainage. All batteries shall be stored in either appropriate weatherproof containers, or in appropriate containers within a building on an impermeable surface with a sealed drainage system. Lead acid batteries shall be stored upright with terminals taped off or capped, in an impermeable acid proof containers to prevent leaks and short circuits. Hazardous waste types suitable for acceptance are limited to those specified in schedule 2, tables S2.2 and S2.3. The amount of hazardous waste stored on site at any one time shall not exceed 200 tonnes. Battery boxes shall be stored no more than 3 metres high. Hazardous waste storage pending treatment shall not exceed 6 months.
Directly Associated Activity			
AR5	Sorting and separation of hazardous waste batteries	R4: recycling/reclamation of metals and metal compounds. R5: recycling/reclamation of other inorganic materials.	Sorting and separation of hazardous waste batteries. Hazardous waste types suitable for acceptance are limited to those specified in tables S2.2 and S2.3. Undertaken in relation to activities AR1, AR2 or AR3. Wastes shall be treated or removed off site within a maximum of six months from the date of receipt.
AR6	Storage of acid	D15: Storage of hazardous wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	Storage of waste acid. Undertaken in relation to activities AR1 and AR2. Waste shall be treated or removed off site within a maximum of six months from the date of receipt.
AR7	Storage of shredded plastic cases	R13: Storage of waste pending the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).	Storage of shredded plastic cases. Undertaken in relation to activity AR2. Waste shall be treated or removed off site within a maximum of six months from the date of receipt.
AR8	Storage of lead plates	R13: Storage of waste pending the operations numbered R1 to R12 (excluding temporary	Storage of lead plates. Undertaken in relation to activity AR1.

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
		storage, pending collection, on the site where it is produced).	Waste shall be treated or removed off site within a maximum of six months from the date of receipt.
AR9	Storage of effluent	D15: Storage of hazardous wastes pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced).	From storage of effluent to collection by tanker for removal from the site.
AR10	Raw material handling and storage	Handling and storage of raw materials.	From the receipt of raw materials to despatch for use within the facility.
AR11	Roof and surface water collection and storage	Collection and storage of uncontaminated site roof and surface water in two 10,000 litre capacity collection tanks.	From the collection of uncontaminated site roof and surface water via interceptor for re-use within the facility or transferred off site for disposal.
Activity reference	Description of activities for waste operations		Limits of activities
AR12	Bulking of non-hazardous waste R4: Recycling/reclamation of metals and metal compounds 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)		Size reduction (through cutting), storage and bulking up of non-hazardous waste metal on an impermeable surface with sealed drainage, in a building. Wastes shall be stored for no longer than 1 year prior to disposal and 3 years prior to recovery. Non-hazardous waste types suitable for acceptance are limited to those wastes specified in table S2.4 and limited to 10 tonnes per day. Maximum storage capacity is limited to 10 tonnes at any one time.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Variation application EPR/GB3701SW/V002	The following responses to Section 3 of part C3 of the application form Table 3 technical standards - CBL011 (process flow diagram) - BAT assessment	26/11/2019
Variation application EPR/GB3701SW/V002	Warehouse storage plan submitted in response to not duly made letter.	07/12/2019
Response to Schedule 5 Notice sent on 01/04/19	Response to all questions relating to: waste acceptance, properties of wastes to be accepted, waste storage, quarantine area, acid storage tank, drainage system, site infrastructure and waste throughput.	02/04/2019

Table S1.2 Operating techniques		
Description	Parts	Date Received
Response to Schedule 5 Notice sent on 01/05/19	Response to all questions relating to: waste storage, drainage system, site infrastructure and battery treatment process.	13/05/2019 and 22/05/2019
Variation application EPR/GB3701SW/V003	Submitted with application - Part C3, Table 3 Technical Standards: Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council (notified under document C(2018) 5070) (Text with EEA relevance.) - Flood Prevention Plan – 130525 - Non-technical Summary 16042024 - Management System CBL-SMS-2024 16042024	13/05/2025 and 16042024
Response to Schedule 5 Notice sent on 17/06/25	Response to all questions: - Email Correspondence – 150725	15/07/2025
Response to Email correspondence sent on 14/08/25	Response to questions regarding FPP (Fire Prevention Plan)	22/08/2025
Response to Schedule 5 Notice sent on 22/08/25	Response to questions regarding: - Email Correspondence – 030925 - Updated BAT Assessment – 030925 - Updated Site Storage Plan – 030925 - Updated Site plan – 030925	03/09/2025
Response to Email correspondence sent on 22/08/25	Response to questions regarding: - Updated Part C3, Table 3 Technical Standards Chemical waste: appropriate measures for permitted facilities (Updated: 18 November 2020)	03/10/2025

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The operator shall ensure that a review of the design, method of construction and integrity of all tanks and bunds is carried out by a qualified structural engineer. The review shall verify whether all storage tanks, drums and containers within the installation are sited on an impermeable base and with sufficient bunding, as specified in the CIRIA C736 Guidance. Where containment provisions do not meet this standard, the operator shall identify improvements, or alternative measures to provide an equivalent level of protection. The Operator shall provide the Environment Agency with a written report of the review which includes the proposed timescales for any improvements identified, which shall be agreed in writing with the Environment Agency.	Completed
IC2	The Operator shall submit a Fire Prevention Plan (FPP) to the Environment Agency for assessment and written approval. The FPP must contain but not limited to:	Within 6 months of issue date

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	• Evidence that the automatic detection system has been designed, installed and will be maintained by an appropriate third-party certification scheme such as UKAS, or meet an appropriate recognised standard such as a British Standard. • Evidence that the suppression system has been designed, installed and will be maintained by an appropriate third party certification scheme such as UKAS. The detection and suppression system/s must be designed installed and maintained as minimum within the waste processing and storage buildings. The revised FPP shall also include • Evidence that the two bunded tanks to contain uncontaminated roof, surface water and fire water runoff have been installed and then assessed by a suitably qualified engineer to meet CIRIA C736 (Construction Industry Research and Information Association ("CIRIA") 736). • A maintenance and inspection regime for the two bunded tanks. The operator shall implement the improvement measures and submit a revised FPP by the deadline specified in this improvement condition unless otherwise agreed in writing with the Environment Agency	

Schedule 2 – Waste types, raw materials and fuels

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

Table S2.2 Permitted waste types and quantities for activity AR1 and AR2 - battery cutting and shredding	
Maximum quantity	The annual tonnage of all combined activities shall not exceed 17,000 tonnes. The combined tonnage of wastes accepted under tables S2.2 and S2.3 shall not exceed 40 tonnes per day. Hazardous properties HP8, HP14.
Waste code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 06	batteries and accumulators
16 06 01*	lead batteries

Table S2.3 Permitted waste types and quantities for activity AR3 - repackaging of hazardous batteries	
Maximum quantity	The annual tonnage of all combined activities shall not exceed 17,000 tonnes. The combined tonnage of wastes accepted under tables S2.2 and S2.3 shall not exceed 40 tonnes per day. Hazardous properties HP8, HP14.
Waste code	Description
16	WASTES NOT OTHERWISE SPECIFIED IN THE LIST
16 06	batteries and accumulators
16 06 01*	lead batteries
16 06 02*	Ni-Cd batteries
16 06 03*	Mercury-containing batteries
20	MUNICIPAL WASTES (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS
20 01	separately collected fractions (except 15 01)
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

Table S2.4 Permitted waste types and quantities for activity AR9 - repackaging of non-hazardous scrap metals	
Maximum quantity	The annual tonnage of all combined activities shall not exceed 17,000 tonnes. The daily tonnage of waste shall not exceed 10 tonnes per day.
Waste code	Description
17	CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)
17 04	metals (including their alloys)
17 04 01	copper bronze brass
17 04 02	aluminium
17 04 03	lead
17 04 05	iron and steel
17 04 07	mixed metals

Schedule 3 – Emissions and monitoring

There are no emission limits.

Table S3.1 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Interceptor	Oil	Weekly		

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Process monitoring Parameters as required by condition 3.5.1	As agreed in writing by the Environment Agency.	Annually or as agreed in writing by the Environment Agency.	1 January

Table S4.2 Annual production/treatment	
Parameter	Units
Metal treated	tonnes
Plastic treated	tonnes
Ferrous metal recovered	tonnes
Non-ferrous metal recovered	tonnes
Other fractions recovered	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
Energy usage	Annually	MWh

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	16/07/2019
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	16/07/2019
Process monitoring	Process Monitoring Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

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	

(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	
To be notified within 24 hours of detection	
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) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
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.

“Annex I” means Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Annex II” means Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste

“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.

“best available treatment, recovery and recycling techniques” shall have the meaning given to it in the document published jointly by the Department for Environment, Food and Rural Affairs, the Welsh Assembly Government and the Scottish Executive on 27th November 2006, entitled “Guidance on Best Available Treatment, Recovery and Recycling Techniques (BATRT) and Treatment of Waste Electrical and Electronic Equipment (WEEE).

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“D” means a disposal operation provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“disposal” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“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.

“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 waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 No.894, the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138), the List of Wastes (England) Regulations 2005 No.895 and the List of Wastes (Wales) Regulations 2005 No. 1820 (W.148).

“hazardous property” has the meaning given in Schedule 3 of the Hazardous Waste (England and Wales) Regulations 2005 No.894 and the Hazardous Waste (Wales) Regulations 2005 No. 1806 (W.138).

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016

“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.

“pollution” includes pollution of the environment, harm to human health and serious detriment to the amenities of the locality, resulting from the permitted activities.

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

“R” means a recovery operation provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Residual materials” means both materials and wastes resulting from the specified operations.

“sealed container” for the purposes of this permit, means a container which is fully enclosed, weather proof, does not allow any solid or liquid content to escape and is lockable.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes (England) Regulations 2005, or List of Wastes (Wales) Regulations 2005, as appropriate, and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

“year” means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, table S2.2, S2.3 or S2.4, for those tables, they have the meaning given below:

‘hazardous substance’ means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008

‘heavy metal’ means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances

‘partly stabilised wastes’ means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term

‘PCBs’ means

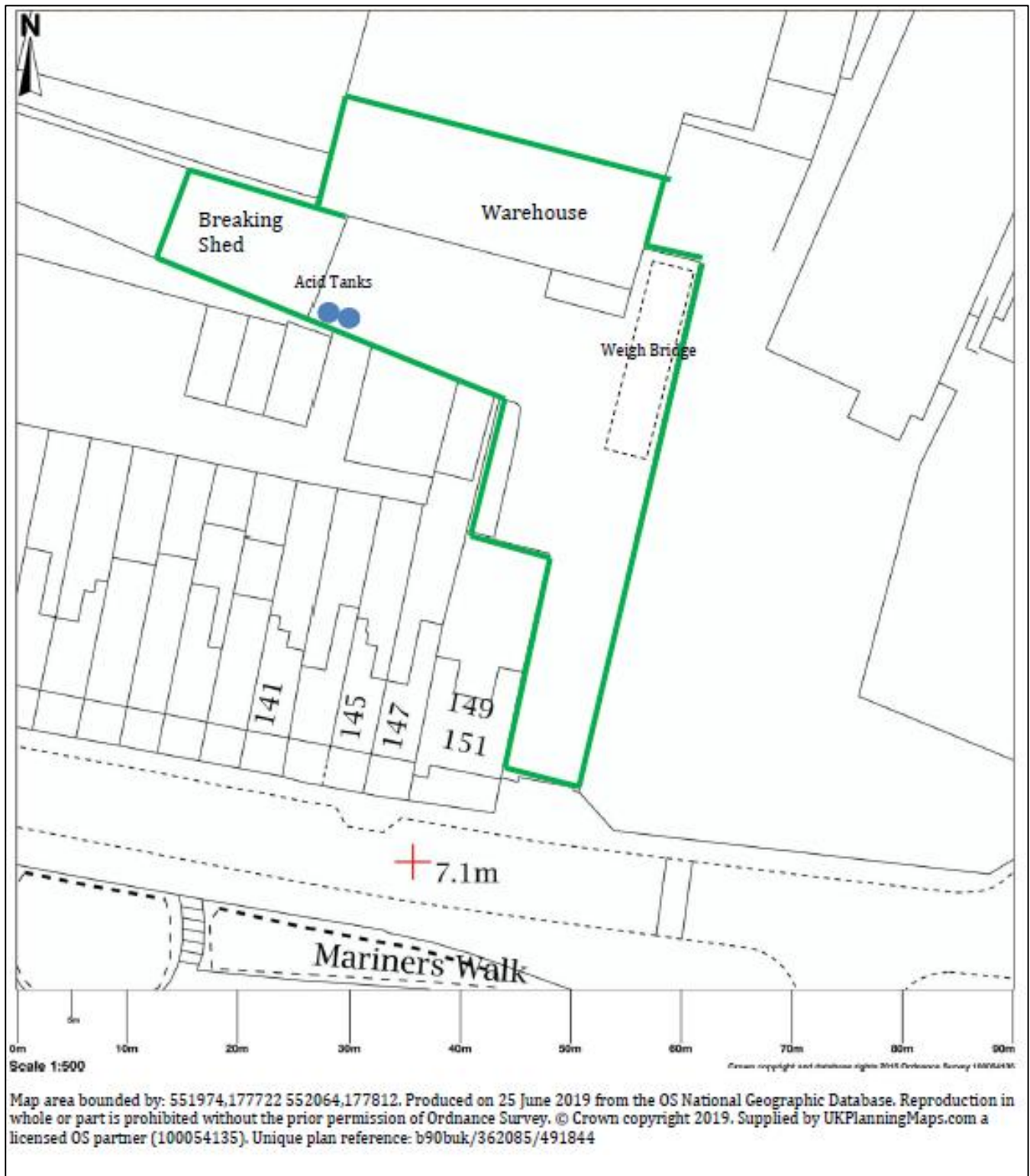
- polychlorinated biphenyls
- polychlorinated terphenyls
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane
- any mixture containing any of the above mentioned substances in a total of more than 0,005 %by weight

‘stabilisation’ means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste

‘solidification’ means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste

'transition metals' means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances

Schedule 7 – Site plan



END OF PERMIT