From:	Shane Tasker
To:	Kate Ellis
Cc:	SM-Defra-RESP-notifications (DEFRA)
Subject:	Re: EPR/YP3522SE/V002 We Need More Information About Your Application CRM:0276169
Date:	02 October 2026 15:00:05
Attachments:	Luton Metal Recycling Limited St Albans Dust Emissions Management Plan v1.0 02.10.26.pdf Luton Metal Recycling Limited St Albans Environmental Management System Version 1.2 02.10.26.pdf Luton Metal Recycling Limited St Albans Environmental Risk Assessment v1.1 02.10.26.pdf Luton Metal Recycling Limited St Albans Noise Emissions Management Plan v1.0 02.10.26.pdf Luton Metal Recycling Limited St Albans Non-Technical Summary v1.1 02.10.26.pdf

Afternoon Kate,

Please find attached and enclosed our responses (**black and bold**) to the points raised below.

I will let you know when the additional payment has been made, but if anything is unclear please give me a call to discuss so these can be resolved by the deadline of the 12th October.

Regards,

Shane

Shane Ronald Tasker TechMCIWM TechIOSH PIEMA EA (IEMA Qualified Auditor)

Telephone: 07919 905206

From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: 28 September 2026 14:51
To: Shane Tasker <shanetasker@hotmail.com>
Cc: Kate Ellis <kate.ellis@environment-agency.gov.uk>
Subject: EPR/YP3522SE/V002 We Need More Information About Your Application CRM:0276169

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/YP3522SE/V002

Operator: Luton Metal Recycling Limited

Facility: Luton Metal Recycling Limited St Albans Site, 7B Smallford Works, Smallford Lane, St. Albans, AL4 0SA

Thank you for your application received on 14/05/2026. The following is to confirm my phone message on 28/09/2026.

Unfortunately the application payment you sent is incorrect. The correct application charge is £ 12,710.32. This leaves a balance of £ 6,510.34 to pay.

The breakdown of charges is as follows:

1.16.16 substantial variation £8,840.65.

1.19.7 NMP £1,293.35.

1.19.5 DEMP £1,288.16

1.19.3 FPP £1,288.16

Total: £12,710.32.

Payment of the additional fee will be made shortly and I will confirm once this has been made.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to the following questions.

1. Provide further information on your operating techniques for metal shredders. 'Treating metal waste in shredders', is referred to in application form Part C4, Table 3a) Operating Techniques but there is no further information provided.
   Reference was made to this guidance document as the site is retaining all the treatment activities that were specified on the standard rules permit currently, but this would only be a mobile shredder anyway so I don't think that guidance applies from previous applications? I can remove reference to this guidance document if best?

2. Provide further information on the treatment activities you will undertake for both the non-hazardous and hazardous waste streams, including WEEE treatment and an explanation of the 'manual/mechanical assistance' referred to in your non-technical summary.
   No change to the treatment activities that are already authorised under the standard rules permit for cables, batteries, scrap metals.

   Gas bottles will be stored only.

   WEEE Wastes will only be manual sorted and separated, no mechanical treatment is proposed, but non-hazardous WEEE wastes will be stored outside whilst hazardous WEEE wastes will be stored undercover.

3. Provide a revised environmental risk assessment that identifies the correct distance from the site to Butterwick Brook and also includes consideration of the deciduous woodland and Smallford Pit Local Wildlife site.
   Butterwick Brook, deciduous woodland and the LWS are adjacent to the west border of the site.

   Please find attached the revised Risk Assessment that takes these into account.

4. Provide robust written waste pre-acceptance and acceptance procedures for your waste streams including EWC 17 09 04 and EWC 16 05 05 and EWC 19 12 12 (mirror non-hazardous waste codes). This is in accordance with The Technical Guidance WM3 and also the relevant appropriate measures guidance referred to in your application. You also need to consider how you will ensure that relevant waste does not contain POPs (Persistent Organic Pollutants).
   For further information, refer to the following guidance:
   - *Waste classification technical guidance (WM3).*

Waste_classification_technical_guidance_WM3.pdf

With regards to EWC Codes 17 09 04 & 19 12 12 these would only be for window frames only and can be limited by the following wording, which has been used on previous applications. The site would only be accepting metals not mixed wastes of any kind.

19 12 12 Other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11 –consisting mainly or solely of steel or aluminium only

17 09 04 mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03 – consisting mainly or solely of steel or aluminium only

16 05 05 was only included to cover canisters that would be inadvertently accepted and isolated within a cage (i.e., empty gas bottles).

As these codes will only include pure scrap metal they will not contain any POPS materials, but I have updated the waste acceptance procedures in the EMS as attached.

5. Provide a revised EMS with the incomplete sections completed.
   Sections of the EMS refer to 'TBC'.
   As these conditions/ewc codes are subject to the application I never include them in on the EMS and this has never been queried previously, but for clarity I have deleted this sections from the EMS.

   Please find attached the updated EMS.

6. Provide a dust emissions management plan and associated fee.
   Your variation application proposes keeping and treating waste material that gives rise to fine or dusty material within 500 metres of sensitive receptors, including scrap metals.
   Please find attached the DEMP.

7. Provide a noise management plan and associated fee.
   We consider there may be a risk of noise and vibration pollution beyond the site boundary because of the types of treatment and wastes you are handling. If you propose to operate outside of normal daytime hours, you will also need to provide a noise impact assessment.

   Please find attached the NEMP.

Please reply directly to this email with your information and copy in kate.ellis@environment-agency.gov.uk.

Postal address:
Integrated Permitting Services
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield

S9 4WF

You must send us the information and or payment by 12/10/2026.

Pay online by credit or debit card

Pay online at this link www.gov.uk/payments/permitting-applications-waste/permitting-application-payment-waste

You need to create your own reference number. Your reference number must follow this format: PSCAPPWASTEXXXXXYYY. It should include the first five letters of the company name (replacing the X's in the above reference number) and a unique numerical identifier (replacing the Y's in the above reference number). Email us the reference number and the payment date so we can track your payment.

Details of how to pay by other methods are given in Part F1 of the application form.

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.
If you have any questions please phone me on 020302 53294 or email kate.ellis@environment-agency.gov.uk.

Yours sincerely,

Kate Ellis

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