

**Environmental Permitting Regulations (England and Wales) Regulations  
2016**

**Compilation of Environment Agency  
Requirements, Approvals and Specifications**

made under

**Permit Number EPR/ZB3335DP**

Issued to

**Cyclife UK Ltd**

for the

**Receipt and Disposal of Radioactive Waste from  
Metal Recycling Facility**

**Issue V004 Dated 01/02/2021**

**TABLE 1: CURRENT REQUIREMENTS**

<b>Permit condition</b>	<b>Requirement number</b>	<b>Effective Date</b>
Condition 2.4.1	2.4.1/v001	01/02/2021
Condition 2.6.2	2.6.2/v003	01/08/2019
Condition 3.1.4(a)	None	
Condition 3.1.7	None	
Condition 3.1.8	None	
Condition 3.2.1(b)	None	
Condition 3.2.1(c)	None	
Condition 3.2.3	None	
Condition 3.2.4	None	
Condition 3.2.5(a)	None	
Condition 3.2.5(b)	None	
Condition 4.1.1(d)	None	
Condition 4.1.2	4.1.2/v003	01/08/2019
Condition 4.2.1	4.2.1/v003	01/08/2019
Condition 4.2.2	4.2.2/P1/v003*	01/08/2019
Condition 4.2.2	4.2.2/P2/v003**	01/08/2019

\* part 1 (pollution inventory)

\*\* part 2 (other specifications)

Authorised .....Andrew Fairhurst.....  
**Andrew Fairhurst**

Authorised to sign on behalf of the Environment Agency

CEAR Issue V004 dated 1<sup>st</sup> February 2021

## **Requirement number 2.4.1/v001**

### **Permit condition**

The operator shall complete the requirements specified in schedule 1 table S1.2 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

### **Environment Agency Agreement**

The Environment Agency agrees a completion date of 31/03/2022 for Improvement Condition IC1 in Table S1.2.

## **Requirement number 2.6.2/v003**

### **Permit condition**

The operator shall ensure that any radioactive waste which does not comply with the specifications produced pursuant to condition 2.6.1 is returned to the consignor as soon as reasonably practicable, unless otherwise agreed in writing with the Environment Agency.

### **Environment Agency Agreement**

The Environment Agency agrees that the operator shall ensure that any consignment or part of any consignment of radioactive waste, found following transfer not to be in accordance with the specifications produced pursuant to condition 2.6.1, is assessed to determine the Best Available Technique for further treatment or disposal, or returned to the customer if a suitable waste route is not available.

## **Requirement number 4.1.2/v003**

### **Permit condition**

The operator shall keep on site all records, plans and the management system required by this permit, unless otherwise agreed in writing by the Environment Agency.

### **Environment Agency agreement**

The Environment Agency approves paper records stored in a fireproof safe at the MRF site and electronic records maintained on servers with daily backup.

## **Requirement number 4.2.1/v003**

### **Permit condition**

The operator shall send all reports and notifications required by this permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

### **Environment Agency agreement**

The Environment Agency requires that, unless specified elsewhere, all reports and notifications required by this permit shall be supplied in writing to:

**Nuclear Regulation Group (North)**  
**Environment Agency**  
**Ghyll Mount**  
**Gillan Way**  
**Penrith 40 Business Park**  
**Penrith**  
**Cumbria**  
**CA11 9BP**

[nrg.north@environment-agency.gov.uk](mailto:nrg.north@environment-agency.gov.uk)

## Requirement number 4.2.2/P1/v003

### Permit condition

The operator shall supply such information in relation to:

- (a) the disposals of radioactive waste; and
- (b) the samples, tests, surveys, analysis and calculations, environmental monitoring and assessments undertaken under conditions 3.2.1 and 3.2.5 in relation to disposals of radioactive waste;

in such format and within such timescales as the Environment Agency may specify in writing.

### Environment Agency specification Part 1: Pollution Inventory

The Environment Agency specifies that:

1. The operator shall supply information relating to disposals of radioactive waste, taking account of the guidance provided in the Pollution Inventory Reporting Form for Radioactive Waste (available from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/515793/LIT\\_7990.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/515793/LIT_7990.pdf)), and in accordance with the following:

(a) the information shall be provided not later than 28 February each year for disposals made during the preceding calendar year;

(b) the information shall be provided by:

- (i) using our web-based reporting system (accessible from <https://piedc.environment-agency.gov.uk/piedc/piedc>); or
- (ii) (ii) completing the Pollution Inventory Reporting Form Radioactive Waste (available from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/515793/LIT\\_7990.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/515793/LIT_7990.pdf)) and e-mailing it to: [nrg.north@environment-agency.gov.uk](mailto:nrg.north@environment-agency.gov.uk) or posting a paper copy to:

Nuclear Regulation Group North  
Environment Agency  
Ghyll Mount  
Gillian Way  
Penrith 40 Business Park  
Penrith  
Cumbria  
CA11 9BP

**In either case, the information identified in 'Part 5' [if present in these forms] is not required.**

(c) the information provided on release quantities shall be the operator's best estimate achievable with the time and resources available. The operator is not required to perform additional monitoring, beyond any demanded by the permit, in order to complete the Reporting Form.

## Requirement number 4.2.2 Part 2/v003

### Permit condition

The operator shall supply such information in relation to:

- (a) the disposals of radioactive waste; and
- (b) the samples, tests, surveys, analysis and calculations, environmental monitoring and assessments undertaken under conditions 3.2.1 and 3.2.5 in relation to disposals of radioactive waste;

in such format and within such timescales as the Environment Agency may specify in writing.

### Environment Agency Specification Part 2: other specifications

1. The operator shall report information relating to waste disposals as specified in table 1 below, at the frequencies and within the timescales specified in that table, and in accordance with the following:
  - (a) The guidance on assessing radioactive discharges in part 5 of Radiological Monitoring Technical Guidance Note 1: Standardised Reporting of Radioactive Discharges from Nuclear Sites  
[http://www.sepa.org.uk/media/101584/radiological\\_monitoring\\_technical\\_guidance\\_note\\_1\\_standardised\\_reporting\\_of\\_radioactive\\_discharges\\_from\\_nuclear\\_sites.pdf](http://www.sepa.org.uk/media/101584/radiological_monitoring_technical_guidance_note_1_standardised_reporting_of_radioactive_discharges_from_nuclear_sites.pdf)
  - (b) For each reportable quantity marked with an asterisk in proformas 1 and 2, the operator shall highlight any reported value which exceeds the mean plus 3 standard deviations of the previous 12 reported values and, as far as reasonably practicable, provide an explanation for any such elevated value.

**Table 1 – Waste Disposal Information**

Information to be supplied	Frequency required	Date by which information is to be supplied
As specified in Proforma 1 - monthly liquid effluent discharge return	Quarterly	30 days after end of month when discharges made
As specified in Proforma 2 - monthly gaseous effluent discharge return	Quarterly	30 days after end of month when discharges made
As specified in Proforma 3 – disposals of waste by transfer to other sites	Annual	30 days after end of year when disposals made
The operator shall provide the Agency with a report on the waste management performance of the facility, including a breakdown of the radioactive waste disposals avoided as a result of the facility operations and materials made available for recycling as a result of the facility operations.	Annual	30 days after end of year when disposals made

NOTE: Returns may be submitted using a format substantially similar to that shown in the relevant proforma.

2. The operator shall, within 3 months of the end of the calendar quarter in which the samples were taken, report analytical results for each sample specified in the table in paragraph 2 of requirement 3.2.5(b) from which an aliquot was dispatched to the Agency's contract laboratory.



3. The operator shall report the results of the environmental monitoring programme (see condition 3.2.1) on a quarterly basis; the reports to be provided within 3 months of the end of the quarter to which they refer and in accordance with the following:
- (a) all positive results (i.e. those exceeding the detection limit) shall be reported with an uncertainty which is at the 95% confidence level (i.e. 1.96 standard deviations) and includes all analytical uncertainties in accordance with ISO 17025 (or equivalent). Where results are less than, or equal to, the detection limit, the detection limit value shall be reported. (See paragraph 1 above for definition of detection limit.);
  - (b) reasons shall be identified for why any:
    - results are late;
    - sample has not been obtained;
    - analysis has not been undertaken;
    - relevant detection limit has not been achieved;
    - radiological assessment has used alternatives to the values and relationships given in Annexe II to the Council Directive 2013/59/Euratom of 5 December 2013. The alternative data used shall be provided.
  - (c) the type(s) of instrument used for contamination monitoring shall be specified;
  - (d) where gamma-spectrometry has been carried out on sediment samples, any positive results for potassium-40 shall be reported;
  - (e) any result which exceeds the mean plus 3 standard deviations of the previous 12 results shall be highlighted and, as far as reasonably practicable, an explanation shall be provided for any such elevated value;
  - (f) any result which exceeds the mean plus 4 standard deviations of the previous 12 results shall be notified to the Environment Agency, without delay.
  - (g) The report for the last quarter of each calendar year shall include annual means and annual ranges for each type of measurement at each location.
4. The information required by paragraph 2 of this specification shall be sent to:
- Radiological Monitoring and Assessment Team
  - Environment Agency
  - Lutra House
  - Dodd Way
  - Walton Summit
  - Bamber Bridge
  - Preston
  - PR5 8BX

All other information required by this specification shall be sent to:

- Nuclear Regulation Group North
- Environment Agency
- Ghyll Mount
- Gillian Way
- Penrith 40 Business Park
- Penrith
- Cumbria
- CA11 9BP

**PROFORMA 1**

**QUARTERLY GASEOUS EFFLUENT DISCHARGE RETURN**

	MONTH ..... YEAR .....	MONTH ..... YEAR .....	MONTH ..... YEAR .....	TOTAL FOR QUARTER ..... YEAR .....	QUARTERLY TOTAL as % of ANNUAL LIMIT
$\alpha$ (Bqm <sup>-3</sup> )					
Total $\alpha$ (kBq)					
$\beta$ (Bqm <sup>-3</sup> )					
Total $\beta$ (kBq)					
TOTAL VOLUME DISCHARGED (m <sup>3</sup> )					N/A

**SIGNED**.....

**PRINT NAME**..... **DATE:**.....

**PROFORMA 2**

**QUARTERLY LIQUID EFFLUENT DISCHARGE RETURN**

	MONTH ..... YEAR .....	MONTH ..... YEAR .....	MONTH ..... YEAR .....	TOTAL FOR QUARTER ..... YEAR .....	QUARTERLY TOTAL as % of ANNUAL LIMIT
$\alpha$ (Bqm <sup>-3</sup> )					
Total $\alpha$ (kBq)					
Other radionuclides (Bqm <sup>-3</sup> )					
Total Other radionuclides (kBq)					
TOTAL VOLUME DISCHARGED (m <sup>3</sup> )					N/A

**SIGNED**.....

**PRINT NAME**.....

**DATE**.....

