

**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 V006
Dated 28/03/2022**

TABLE 1: CURRENT REQUIREMENTS

Permit condition	Requirement number	Effective Date
Condition 2.4.1	2.4.1/v002	28/03/2022
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)	3.2.1(b)/v001	20/07/2021
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/v005**	28/03/2022

* Part 1 (pollution inventory)

** Part 2 (other specifications)

AuthorisedRona Arkle.....
Acting PDDS Team leader

Authorised to sign on behalf of the Environment Agency

CEAR Issue V006 dated 28 March 2022

Requirement number 2.4.1/v002

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 01/10/2022 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 3.2.1(b)/v001

Permit condition

The operator shall:

(b) unless otherwise agreed in writing by the Environment Agency:

- (i) define, document and carry out an environmental monitoring programme
- (ii) use the results of that programme to carry out an annual retrospective assessment of the dose to the representative person;

Environment Agency Agreement

For 3.2.1(b)(ii):

The Environment Agency agrees that the operator need not carry out an annual retrospective assessment of the dose to the representative person as a result of discharges from the Metals Recycling Facility.

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 Metals Recycling Facility 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

or

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), 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) 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) and e-mailing it to: 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/v005

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) 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	Annual	31 March after end of year when disposals made
As specified in Proforma 2 – monthly gaseous effluent discharge return	Annual	31 March after end of year when disposals made
As specified in Proforma 3 – disposals of waste by transfer to other sites	Annual	31 March 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 report the results of the quarterly environmental monitoring programme (see condition 3.2.1) on an annual basis; the report to be provided within 3 months of the end of the year to which it refers 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.
 - (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
 - (c) the type(s) of instrument used for contamination monitoring shall be specified;

- (d) 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;
 - (e) any result which exceeds the mean plus 4 standard deviations of the previous 12 results shall be notified to the Environment Agency, without delay.
3. All information required by this specification shall be sent to:

nrg.north@environment-agency.gov.uk

PROFORMA 1

**ANNUAL GASEOUS EFFLUENT DISCHARGE RETURN
FOR CYCLIFE METAL RECYCLING FACILITY**

YEAR: _____

	Alpha-emitting radionuclides		Beta-emitting radionuclides		Total volume discharged (m ³)
	Bq m ⁻³	kBq*	Bq m ⁻³	kBq*	
January					
February					
March					
Quarter 1 total					
April					
May					
June					
Quarter 2 total					
July					
August					
September					
Quarter 3 total					
October					
November					
December					
Quarter 4 total					
Annual total					
Annual total as % of annual limit					

SIGNED.....

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

PROFORMA 2
ANNUAL LIQUID EFFLUENT DISCHARGE RETURN
FOR CYCLIFE METAL RECYCLING FACILITY

YEAR: _____

	Alpha-emitting radionuclides		Other radionuclides		Total volume discharged (m ³)
	Bq m ⁻³	kBq*	Bq m ⁻³	kBq*	
January					
February					
March					
Quarter 1 total					
April					
May					
June					
Quarter 2 total					
July					
August					
September					
Quarter 3 total					
October					
November					
December					
Quarter 4 total					
Annual total					
Annual total as % of annual limit					

SIGNED.....

PRINT NAME.....

DATE:.....

