

# How to apply for an environmental permit

## Part RSR-B6 – Standard facility for the accumulation and disposal of radioactive waste from the NORM industrial activity of the production of oil and gas



### Guidance notes

#### Please read these guidance notes carefully before you fill in the forms.

This guidance will help you complete your application to accumulate and dispose of radioactive waste from the production of oil and gas. You should use Part RSR-B6 to make your application.

In addition to this guidance, you should also read the standard rules and our general guidance to operators; these are available from our website.

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## Part A

We expect that you will have already applied for, or are applying for, other environmental permits for the site. If that is the case, provide a copy of the Part A form that you have already submitted. If not, fill one in and submit it. You can use either of the following:

- Part RSR-A available at [www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites](http://www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites)
- The generic Part A available at [www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you](http://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you)

## Part F

At question 2c tick 'No' and complete the table as follows:

RSR permit type	Application type	Charges due (£)
Oil and gas standard rules	New	See charging scheme (below) charge in April 2018 is £1867

Then complete section 3 onwards of Part F.

See also the guidance on RSR Part F at [www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites](http://www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites)

## Part RSR-B-6

### 1 About the premises

#### 1.1 What is the name and address of the premises where you intend to carry on a radioactive substances activity?

Give the full address of the premises – post office box numbers alone are not acceptable. Include a postcode where there is one that relates to the geographic location of the premises (that is, not a postcode relating to a box number).

You will need a separate permit for each premises where you carry out a radioactive substances activity. What might be considered as a single premises is not always clear-cut (for example, where several nearby buildings are involved that are separated by public roads or other land). We will normally consider a group of buildings and/or areas of land to be a single premises where:

- they are in reasonable proximity (usually within a few hundred metres, whether or not separated by public roads)
- they can reasonably be regarded as part of the same unit; and
- a common management system is applied to the activities carried out in them.

Please contact us to discuss your particular circumstances.

#### 1.2 Please give the national grid reference for the premises.

Provide the 12-character Ordnance Survey national grid reference for the centre of the site; for example, ST 12345 67890. You can find your grid reference at [www.ukgr.dreamhosters.com](http://www.ukgr.dreamhosters.com)

#### 1.3 Please provide a plan of the site, marking the site boundary in green.

You must send us a site plan that identifies all of the land on which your radioactive substances activities will take place (the 'site') and its geographical location (for example, by identifying nearby roads or other landmarks). The site will normally include all the land within the boundary of the premises, together with any systems used for the disposal of radioactive waste that extend beyond the normally

recognised premises boundary. However, you do not need to show the boreholes extending vertically and horizontally from the surface premises, as these are defined to be within the site (rule 2.2) when used for the disposal of radioactive waste.

If your radioactive substances activities are confined to a limited part of the premises (for example, a part of a large site) you may choose to include only that part within the site plan.

But you must ensure you include, as appropriate, all areas:

- where you accumulate or dispose of radioactive waste;
- that are used to move radioactive waste around the premises;
- where supporting activities covered by permit conditions (such as record keeping) are carried out.

If you choose this option, you will need to apply for a variation before using any other part of the premises for a radioactive substances activity at a later date.

If there are buildings or areas of land within your site that are not used for your radioactive substances activities and are not under your control you may show them as a hatched area on the site plan. In the case of a premises consisting of physically separate buildings or areas of land, as discussed above, the site plan may consist of a number of non-contiguous areas.

In general, the only detail that is required is the site boundary – there is no need to show individual buildings, drain runs, and so on, within the boundary. You should show any public roads that cross the site.

If you want to reduce the area shown on the site plan included in your permit, you will need to apply for a partial surrender and satisfy us that you have avoided pollution or returned that part of the site to a satisfactory state. We cannot do this as a variation.

## 2 Your confirmations

In this section, we ask you to make a number of important confirmations about your ability to operate within the standard rules, so that we can be confident that a standard permit is suitable for you. You should make these confirmations only after reading the guidance and satisfying yourself that you can comply with all the rules and limits in SR2014 No4. We will grant a standard rules permit only where you have made all the confirmations on the application form, Part RSR-B6.

You should read the standard rules and the following guidance to understand what you need to do to comply with a standard rules permit if issued:

- SR2014 No4 Accumulation and disposal of radioactive waste from the NORM industrial activity of the production of oil and gas
- Radioactive substances regulation (RSR): Regulatory guidance series RGN RSR 3
- Open sources: how to comply with your EPR RSR environmental permit all available at [www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites](http://www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites).

**2.1** We want to make sure you have read and understood our guidance. If you have any queries please contact the Radioactive Substances Regulation Permit Support Team on

Phone: 020 302 58174 or 020 302 58207

Email: [RSR.Rotherham2.NE@environment-agency.gov.uk](mailto:RSR.Rotherham2.NE@environment-agency.gov.uk)

**2.2** SR2014 No4 authorises the accumulation and disposal of radioactive waste in the form of naturally occurring radioactive materials (NORM) from the ‘production of oil and gas’. It does not authorise the accumulation and disposal of radioactive waste from any other type of activity. In this context, ‘production of oil and gas’ means production of these during both exploration and commercial-scale operations and ‘production’ starts with the natural, or stimulated, flow of either substance. These NORM wastes may include:

- waste water containing NORM resulting from the production of oil and gas, as NORM is present in many geological formations including oil-and gas-bearing strata.

This water is often referred to as ‘produced water’ or ‘flowback water’.

- waste solids contaminated with NORM, such as sands, sediments, scales and sludges removed from process vessels; waste equipment such as pumps, process vessels or pipework, contaminated with NORM.

Wastes will be deemed radioactive waste where the concentrations of NORM are above the ‘out of scope’ levels specified in the regulations. There is guidance on this in ‘Guidance on the scope of and exemptions from the radioactive substances legislation in the UK’ available at [www.gov.uk/government/publications/guidance-on-the-scope-of-and-exemptions-from-the-radioactive-substances-legislation-in-the-uk](http://www.gov.uk/government/publications/guidance-on-the-scope-of-and-exemptions-from-the-radioactive-substances-legislation-in-the-uk)

We consider that operators expect to produce oil and gas where they provide facilities to handle and store them at the wellhead; or, in the case of gas, they provide facilities to combust flare or vent gas. Operators must hold a radioactive substances permit before production starts.

You should apply for SR2014 No4 only where you are intending to accumulate and dispose of NORM waste from the production of oil and gas.

**2.3, 2.4, 2.5** The standard permit you will receive if your application is successful contains all the rules we think are relevant to the accumulation and disposal of radioactive waste arising from the production of oil and gas. For clarity, the permit does not authorise you:

- to accumulate other wastes types, other radionuclides or different amounts of waste from those specified in the permit (2.3)
- to dispose of wastes other than the types and by the disposal routes specified in the permit (2.4).

We need to make sure that you understand this and that you will accumulate and dispose of wastes only within the terms and conditions of the permit. We will check that you do.

You will also need to comply with other requirements of the permit and we will check that you do. These requirements are explained in the guidance documents listed in section 2.

You should make these confirmations only where you have assessed and concluded that you can comply with all the requirements of SR2104 No4.

**2.6** You must have in place contracts with a waste disposal/storage company or companies to dispose of all your wastes. (It is acceptable to establish a contract or contracts with a waste disposal company; it is not necessary to specify any particular site that will receive the waste.) You should confirm that you have contractual arrangements in place to do this, or, where disposal may not take place for some time, that such contractual arrangements can be put in place. These contracts and transfer records should be available for inspection by us, the Environment Agency, at both the application stage and any subsequent stage of regulatory activity.