

## **Environment Agency permitting decisions**

### **Variation (Substantial)**

We have decided to issue the variation for Victrex Polymer Production Hillhouse operated by Victrex Manufacturing Limited.

The variation number is EPR/BU5640IA/V007.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

### **Purpose of this document**

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

### **Structure of this document**

- Description of main features of the changes introduced by the variation
- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

## Description of the changes introduced by the Variation

This is a Substantial Variation.

Changes are required as follows:

- the addition of a new Polymer Innovation Centre (PIC) plant, which will be a small scale facility, intended to enable the development of:-
  - new thermo-plastic products,
  - production methods, and
  - improve process optimisation.

Some of these may be further scaled up for use in the main production powder plants, PPP1 to PPP3.

- consent limits for existing points W1 and W3 are combined to a single point identified as W5. The operator is required to monitor the contribution from the individual sources, W1 and W3, that comprise W5, which has a single combined consent limit applied at the main outfall to the estuary of the River Wyre.
- to make a minor change to the installation boundary around the blending plant.

## Site Description

The installation produces various grades of high performance thermo-plastics, including polyaryletherketones (PAEK) with a production capacity of approximately 7,200 tonnes per annum (tpa).

It is located in an industrial complex, adjacent to the River Wyre to the north-east. The nearest sensitive receptors are a school and residential receptors approximately 500m west, and residential receptors 400m to the south and south-east.



## Key issues of the decision

### 1 Polymer Innovation Centre (PIC)

The PIC plant will comprise a polymer scale-up facility (semi-technical plant), which will be linked to the recently operational Powder Plant 3 (PPP3) and will release process emissions to air via a dedicated new stack at release point RP PIC1 (A17).

The processes to be carried out within the PIC plant are pilot plant scale operations, and therefore compared to the main manufacturing processes carried out within the installation (annual capacity of all three existing PAEK Powder Plants approximately 7,200 tonnes per annum), will be very small scale, with annual production capacity unlikely to exceed 30 tonnes per annum once fully commissioned and operational. This is only **0.42%** of the main manufacturing production.

## 1.1 Raw Materials and Management of Change

The operations to be carried out in the PIC plant will in part be research and development activities, so it is anticipated that there will be some variance with regard to the actual raw materials handled and used in the PIC plant.

The effective operation of the PIC plant as a research and development pilot plant is anticipated to incorporate the trialling and processing of a range of monomers, solvents, additives and other materials during the plant life-time. It is proposed that this potential variance for the PIC plant be incorporated into the varied Environmental Permit to allow ongoing research and development without the need for repetitive permit variations.

All product development processes which are proposed for processing through the PIC plant will already have completed a rigorous lab scale research and development (R&D) review.

All alternative new raw materials proposed for use in the PIC plant will be subject to a detailed review prior to their introduction to the installation, to determine whether they introduce an increased risk of environmental harm.

A number of the substances proposed to be used in the PIC plant are commercially sensitive in nature. The operator therefore considered it more appropriate to introduce a list of substance types likely to be used in the plant, including examples of potential raw materials, within defined chemical groups, rather than providing a definitive list of actual raw materials to be used.

Chemicals to be used have therefore been described according to their reaction function, i.e. monomers, solvents, additives, etc. It is anticipated that raw materials from the same chemical groups will pose similar risks to the environment.

The environmental risk assessment provided with the application is considered to be applicable to the generic substances to be used in the PIC plant in the future, however every new raw material to be introduced will undergo a specific risk assessment to ensure there is no additional environmental risk.

The operator proposes to expand the existing Change Management procedures to incorporate a two stage assessment of the potential risks associated with the introduction and use of new raw materials or alternative reaction characteristics as follows:

1. Scale-up from Laboratory R&D to PIC plant; and
2. Scale-up from PIC plant to main production powder plants (PPP1 to PPP3).

The Change Management process at each stage will incorporate a new environmental risk review to assess the proposed changes. The environmental risks posed by the new materials will be reviewed against the characteristics of the existing site raw materials which will be used as

exemplars against which the acceptability of the proposed new materials can be reviewed and will also incorporate a review of potential implications on the permit.

Indicative classifications have been proposed as follows:

1. Insignificant Change – changes fall within existing envelope
2. Potentially Significant Change – changes do not fall within existing envelope but do not lead to significant environmental impact.
3. Significant Change - changes do not fall within existing envelope and have the potential to lead to significant environmental impact.

The operator commits to notify the Environment Agency prior to the commencement of any potentially and/or significant changes. This process will be managed through the management techniques described in Section 9 of the application supporting information.

We have secured this through the inclusion of a pre-operational condition (for future development) in table S1.4 and incorporation of the Management of Change Process in Section 9 of the application in table S1.2 of the permit. We have also included provision in table S1.2 to incorporate the approved management system and risk assessment procedures required prior to commissioning of the PIC plant.

We have also included a pre-operational condition requiring the operator to notify us on scale-up from PIC to the main powder plants (PPP1 to PPP3).

It should be noted that based on the overall scale of the PIC plant, the quantity of new raw materials used will be relatively small compared to the quantities used in powder plants PPP1 to PPP3.

## **2 Emissions to Air – Assessment**

An assessment of the potential environmental impacts resulting from the emissions to air from the new PIC plant has been undertaken. The impact for the existing installation has initially been determined, and then the emissions from the PIC plant have been assessed in conjunction with the existing installation emissions.

The pollutants have been assessed through an initial screening assessment using the Environment Agency H1 assessment tools. Where impacts have not been screened from requiring further assessment, detailed dispersion modelling has been carried out using the proprietary model ADMS 5.

Emissions to air from the installation point sources have been modelled to determine the likely worst-case process contributions (PCs) in the receiving environment. These have been added to the background pollutant concentrations to determine the overall Predicted Environmental

concentration (PEC) at sensitive receptor locations, which have then been assessed against air quality standards.

The results of the air dispersion modelling demonstrate that there is no difference in the impact at sensitive receptors from the existing and the proposed scenario, with the PIC plant.

Our review of the operator's assessment leads us to agree with their conclusions. The results of the assessment are consistent with the small scale of the PIC plant.

### **3 Emission Limits for water release points W1 and W3**

The installation currently releases emissions to the River Wyre via the main Hillhouse Estate outfall point at three existing release points; W1, W3 and W4.

Emissions will be unchanged.

W1	receives the discharge to surface water from the existing PPP1 and PPP2 plants effluent pit.
W3	receives the process water from PPP3 effluent pit.
W4	tidal discharge used to release high fluoride effluent from PPP2 and PPP3.

The W1 and W3 release points have associated emission limits for a range of pollutants, and 24- hour flow proportional samples are taken to monitor compliance. Continuous monitoring for flow and temperature is also carried out at each of the monitoring points.

Since the commencement of operations in PPP3 there have been two occasions when the released effluent marginally exceeded the acetone consent limit for the W3 release point, however the overall concentration would have remained below the maximum levels which could be theoretically discharged from the main Hillhouse Estate outfall point via W1 and W3 combined.

It is proposed that the existing individual consent limits for release points W1 and W3 (which apply at the emission monitoring points) are removed from the Permit, and that a new single combined consent limit (incorporating the existing W1 and W3 discharges) be applied at the main outfall to the estuary of the River Wyre. No changes will be made to the outfall itself, however a new release point identified as W5 is proposed for the permit for the combined W1 and W3 effluent.

It is therefore proposed that the effluent will continue to be sampled and monitored at the current W1 and W3 locations (and these references will remain as process monitoring points), but compliance with the emission limits will be calculated as a combined effluent at the point of discharge from the main outfall into the Estuary of the River Wyre, identified as release point W5, as follows:

- The mass of acetone, COD, fluoride (as F<sup>-</sup>) and suspended solids from both monitoring points (W1 and W3) will be calculated using the existing MCERTS flow meters and the measured concentrations.
- The concentration of acetone, COD, fluoride (as F<sup>-</sup>) and suspended solids at the River Wyre's main outfall (release point W5) will then be calculated based on the total mass release and the total volume of effluent released at process monitoring points W1 and W3.
- The minimum pH, maximum pH and maximum temperature (10 min rolling average) at process monitoring points W1 and W3 will be assumed for the combined release from release point W5.

The existing compliance monitoring database will be modified to calculate the concentration at the release point W5 main outfall to the River Wyre, as described, from the combined discharges associated with the process monitoring points W1 and W3.

<b>Table 3-3: Proposed Consent Limits for Release Point W5</b>				
<b>Parameter</b>	<b>Unit</b>	<b>Existing W1 Limits</b>	<b>Existing W3 Limits</b>	<b>Proposed Discharge to Wyre Estuary – W5</b>
Acetone	mg/l	900	300	700
COD	mg/l	2,400	850	2,000
Suspended Solids	mg/l	300	300	300 <sup>Note 1</sup>
Fluorides (as F <sup>-</sup> )	mg/l	2,800	200	2,400
pH minimum	N/A	6	6	6
pH maximum	N/A	12	12	12
Temperature	°C	<40	<40	<40
Mercury	mg/l g/yr	0.001 13.5	0.001 13.5	0.001 13.5
Cadmium	mg/l g/yr	0.001 5	0.001 5	0.001 5
Flow	m <sup>3</sup> /day	No Limit	No Limit	No Limit

Note 1: As a 95<sup>th</sup> percentile.

The proposed limits are based on the following:

- The calculated concentration for the combined W1 and W3 discharges using available monitoring data and the % uncertainty for the monitoring;
- The known ratio for acetone verses COD has been used and applied based on the proposed consent limit for acetone; and,
- An allowance for plant shutdown/ start-up conditions is built into the limits.

Internal process control limits will remain in place for the process monitoring points W1 and W3, which are local to the process effluent pits.

Early warning limits will be used to identify abnormal process conditions for investigation.

The site does not currently have consent limits for the volume of effluent discharged, however it is considered appropriate to demonstrate that the proposed new monitoring arrangements and consent limits associated with release point W5 will not result in an increase in the actual pollutant loading.

The table below was taken from the application and shows the current flow data for the installation.

Flow	W1	W3	W5
Flow (Min) m <sup>3</sup> /day	0	0	0
Flow (Avg)* m <sup>3</sup> /day	946	285	1,231
Flow (Max) m <sup>3</sup> /day	1,334	806	1,852

\* Average flow data excludes plant shutdown/initial PPP3 commissioning.

Non-process derived effluent streams (for example surface water drainage) are also discharged through the W1 and W3 monitoring points, and therefore also release point W5, therefore the maximum flows are not representative of process effluent volumes.

The mass release (kg/day) at the main outfall, based on average flows for the existing and proposed consent limits have been calculated and are shown in the table below (taken from the application) for comparison.

Parameter	Existing Mass Release			Proposed	%age Change
	W1	W3	Combined	W5	
Acetone (kg/day)	852	85	937	862	8.0% Reduction
COD (kg/day)	2,271	242	2,513	2,463	2.0% Reduction
Fluoride (kg/day)	2,650	57	2,707	2,955	9.2% Increase



It can be seen from the above table that the proposed changes are anticipated to result in a decrease in the calculated mass emission of acetone and COD.

The proposed new consent limit for fluoride from release point W5 covers times when there is no flow from W3 (i.e. flow only from W1, which has a much higher concentration of fluoride, and therefore no dilution from the W3 stream is provided).

The proposed new consent limit for fluoride from release point W5 also covers non-routine conditions over a small period of operation.

Historical monitoring data shows fluoride emissions to be significantly lower than the proposed consent limit for release point W5, and therefore the estimated mass emission for fluoride from release point W5 detailed in the table above is anticipated to be an over-estimation of the actual release, which is expected to be significantly lower.

The operator considered that as there is no change to the mass emissions themselves, only the way in which compliance is measured, there was no requirement to revise the impact assessment of these releases on the receiving water.

Previous ecological surveys have shown no significant impact around the release point to the River Wyre estuary.

Our review of the operator's proposal leads us to agree with their conclusions.

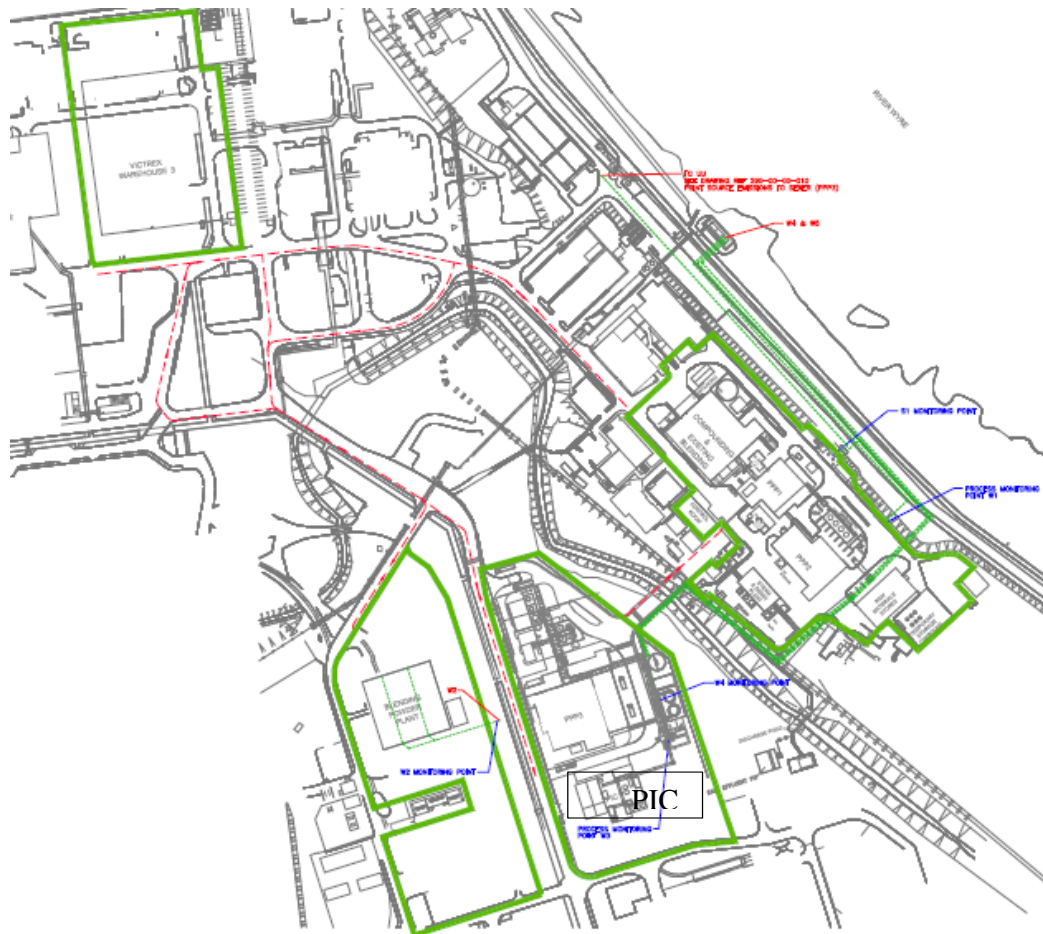
We have set process monitoring for points W1 and W3 in table S3.5 of the permit. We have included intervention levels for the parameters which previously had limits set. These levels indicate potentially abnormal process releases requiring investigation.

We have added point W5 to table S3.2 with the proposed limits that will be calculated from the process monitoring at points W1 and W3.

#### 4 Installation Boundary

The installation is separated into four distinct areas:

- Main Warehouse (Warehouse 3);
- Powder Plants PPP1 and PPP2;
- Powder Plant PPP3; and
- Blending Plant.



The new PIC plant will be constructed on currently vacant land within the existing PPP3 area of the installation boundary. The PIC plant will be located directly to the south of the PPP3 production facility, and will make use of the services (steam, nitrogen, compressed air etc.) and effluent disposal facilities from PPP3.

There is no change to the installation boundary as a result of activities to be carried out in the PIC plant; however a report on the site condition was provided. A Baseline Environmental Site Assessment (Ref:60486099 / LERP0001/Final Issue, dated June 2016) was provided for the plot on which the PIC plant is to be situated. During the course of the investigation, four new boreholes were installed within the plot; two each in the assumed up and down hydraulic gradient of the PIC plant, to enable future monitoring if required.

We have reviewed that report and consider that it adequately describes the condition of the soil and groundwater in the vicinity of the PIC plant prior to the start of operations.

The baseline report is an important reference document in the assessment of contamination that might arise during the operational lifetime of the installation and at cessation of activities at the installation.

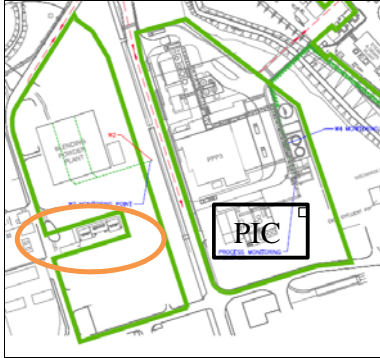
At the definitive cessation of activities, the operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site's current or approved future use. To do this, the operator will apply to us for surrender of the permit, which we will not grant unless and until we are satisfied that these requirements have been met.

There is however a minor change to the installation boundary around the blending plant area. A small area of land located on the south west side of the blending plant is required for a small electrical substation/transformers. The location of the new asset will be shared with another business and therefore the installation boundary requires a slight amendment to exclude this area.

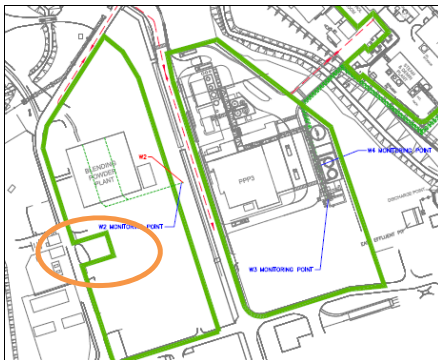
The blending plant land was included within the installation boundary by variation EPR/BU5640IA/V003, and since this time the land that will be used for the substation has not been occupied, or used for any scheduled activity. The only activity carried out within the vicinity of the land involves the blending of inert polymers within the blending plant building itself, and therefore it is considered highly unlikely that any ground contamination could have occurred as a result of these activities.

The figures below show the existing and revised installation boundaries, excluding the land for the new substation/transformer. The location of the new PIC plant is also shown.

### Existing



### Revised



Given the minor change, low risk and operator competence we have agreed to make this change without requiring the operator to provide a description of the condition of this plot of the site. In any event, a baseline report was provided for the PIC area.

Drawing 290-00-00-014, Issue D provided with this application is updated to reflect this and included in Schedule 7 of the permit.

### Annex 1: decision checklist

This document should be read in conjunction with the application, supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Receipt of submission</b>		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
<b>Consultation</b>		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"> <li>• Preston County Council</li> <li>• Wyre Borough Council, Environmental Health</li> <li>• Food Standards Agency</li> <li>• Health &amp; Safety Executive</li> <li>• North Western IFCA (Inshore Fisheries and Conservation Authority)</li> <li>• Public Health England</li> <li>• Port of Fleetwood</li> <li>• United Utilities</li> </ul>	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
<b>The facility</b>		
The regulated facility	<p>The extent/nature of the activities and operations taking place at the site have changed to include the PIC.</p> <p>The decision on the facility was taken in accordance with Appendix 2 of RGN 2 "Defining the scope of the</p>	✓

Aspect considered	Justification / Detail	Criteria met												
		Yes												
	<p>installation” and Appendix 1 of RGN 2 “Interpretation of Schedule 1”.</p> <p>The PIC falls within the scope of the listed activity for the powder plants, PPP1 to PPP3. Table S1.1 is updated to amend the description of the listed activity.</p> <table border="1"> <thead> <tr> <th colspan="3">Table S1.1 Activities</th> </tr> <tr> <th>Activity listed in Schedule 1 of the PPC Regulations</th> <th>Description of specified activity</th> <th>Limits of specified activity</th> </tr> </thead> <tbody> <tr> <td>Section 4.1 A(1) (a) (viii) Producing organic chemicals such as - plastic materials (for example polymers, synthetic fibres and cellulose-based fibres).</td> <td>Producing organic chemicals: Production of high performance thermo-plastics (polymers).</td> <td>From receipt of raw materials to storage of finished product.  Three powder plants (PPP1, PPP2 and PPP3) with each line consisting of two polymerisation vessels.  PPP1 – lines 1 and 3 PPP2 – line 5 PPP3 – lines 7 and 9  <b>PIC with a single polymerisation vessel.</b>  <b>Solvent recovery by distillation for re-use in the process for the powder plants and the PIC.</b></td> </tr> <tr> <td colspan="3">Directly Associated Activities</td> </tr> </tbody> </table>	Table S1.1 Activities			Activity listed in Schedule 1 of the PPC Regulations	Description of specified activity	Limits of specified activity	Section 4.1 A(1) (a) (viii) Producing organic chemicals such as - plastic materials (for example polymers, synthetic fibres and cellulose-based fibres).	Producing organic chemicals: Production of high performance thermo-plastics (polymers).	From receipt of raw materials to storage of finished product.  Three powder plants (PPP1, PPP2 and PPP3) with each line consisting of two polymerisation vessels.  PPP1 – lines 1 and 3 PPP2 – line 5 PPP3 – lines 7 and 9  <b>PIC with a single polymerisation vessel.</b>  <b>Solvent recovery by distillation for re-use in the process for the powder plants and the PIC.</b>	Directly Associated Activities			
Table S1.1 Activities														
Activity listed in Schedule 1 of the PPC Regulations	Description of specified activity	Limits of specified activity												
Section 4.1 A(1) (a) (viii) Producing organic chemicals such as - plastic materials (for example polymers, synthetic fibres and cellulose-based fibres).	Producing organic chemicals: Production of high performance thermo-plastics (polymers).	From receipt of raw materials to storage of finished product.  Three powder plants (PPP1, PPP2 and PPP3) with each line consisting of two polymerisation vessels.  PPP1 – lines 1 and 3 PPP2 – line 5 PPP3 – lines 7 and 9  <b>PIC with a single polymerisation vessel.</b>  <b>Solvent recovery by distillation for re-use in the process for the powder plants and the PIC.</b>												
Directly Associated Activities														
<b>European Directives</b>														
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓												
<b>The site</b>														
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including discharge points.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p> <p>Refer to key issues section above.</p>	✓												
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–guidance and templates (H5).</p> <p>Refer to key issues section above.</p>	✓												

Aspect considered	Justification / Detail	Criteria met
		Yes
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance. We sent an Appendix 11 Habitats Assessment and an Appendix 4 CROW Assessment to Natural England for information only.</p>	✓
<b>Environmental Risk Assessment and operating techniques</b>		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory. Refer to key issues section above.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The changes to emissions of pollutants to air are screened out as insignificant at sensitive receptors, and so the Environment Agency agrees that the applicant's proposed techniques are BAT for the installation.</p> <p>The proposed changes do not result in any changes to emissions to water.</p> <p>There will be approved management procedures in place to control any changes that may occur as a result of scaling up from the PIC to the main powder plants PPP1 to PPP3.</p> <p>Refer to key issues section above.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The permit conditions</b>		
Odour	We consider that the operator's proposals represent the appropriate measures to prevent/minimise odour from the permitted activities.	✓
Raw materials	Controls on the use of raw materials will be managed through procedures submitted in response to the pre-operational measures in table S1.4 of the permit.  Refer to key issues section above.	✓
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions.  Refer to key issues section above.	✓
Improvement conditions	We removed conditions IC1 to IC3 included in variation EPR/BU5640IA/V006. Refer to Compliance Assessment Report ID: BU5640IA/0266094 which confirms that IC1 and IC2 have been completed and that IC3 will be superseded by this variation for the PIC plant.  Based on the information in the application, we consider that we need to impose improvement conditions, these are now numbered IC1 and IC2.  We have imposed IC1 to ensure that releases from the PIC plant are consistent with those provided in the application and to determine the requirement for any future monitoring.  An additional improvement condition IC2 has been set to ensure that the releases identified by IC1 are representative of the operations and subsequent releases over a longer period of operation. This will ensure that releases and impacts associated with different batches and campaigns are clearly represented.	✓
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.	✓



Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>These descriptions are specified in the Operating Techniques table in the permit.</p> <p>Refer to key issues section above.</p>	
Emission limits	<p>We have set intervention levels at W1 and W3. We have set limits at W5 and compliance with these will be based on process monitoring at W1 and W3.</p> <p>Refer to key issues section above for releases to water.</p>	✓
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. We have made some changes to emissions to water, refer to key issues section above.</p>	✓
Reporting	<p>We have made changes to the reporting to include W5 as specified in the permit.</p>	✓
<b>Operator Competence</b>		
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with our guidance on what a competent operator is.</p>	✓
Financial provision	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with our guidance on what a competent operator is.</p>	✓

## Annex 2: External Consultation and web publicising responses

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

Response received from
North Western Inshore Fisheries and Conservation Authority (IFCA), Fisheries and Conservation Advisor, letter dated 12 September 2016.
Brief summary of issues raised
None
Summary of actions taken or show how this has been covered
No action required

Response received from
Director of Public Health, Senior Public Health Co-ordinator, Lancashire County Council, email sent 4 October 2016.
Brief summary of issues raised
1. That technical expertise is sought from the appropriate consultees, specifically for emissions to air.
2. Regarding the disposal of waste materials off site, consideration should be given to routes used to remove this waste and times of waste removal. Assurance should be sought that the removal of waste materials from the site does not pose a risk to those in the environment surrounding the premises, including road users and pedestrians.
Summary of actions taken or show how this has been covered
1. Regarding emissions to air, we are responsible for this assessment. Our review of the operator's assessment leads us to agree with their conclusions with the results being consistent with the small scale of the PIC plant. Refer to key issues section above.
2. Conditions in Section 1.4 of the permit place the necessary controls on wastes produced by the installation.

Response received from
Public Health England, Environmental Public Health Scientist, letter dated 30 September 2016.
Brief summary of issues raised
None
Summary of actions taken or show how this has been covered
No action required