

Permitting Decisions - Variation

We have decided to grant the variation for Bilston Copper Shaft Furnace operated by Mueller Europe Limited

The variation number is EPR/BJ9843IH/V010.

This variation authorises the following changes to the permit:

Addition of a gas-fired reverberatory furnace which will melt scrap copper, refine it and cast it into copper ingots which will then be used as feedstock for the existing shaft furnace. The new activity falls under Section 2.2 Part A(1)(b) Melting, including making alloys of, non-ferrous metals.

The new refinery plant will have two emission points to air, one associated with the emissions from the furnace during normal operation and a second emission point via a bypass stack which will only be used in the event of an emergency. Both stacks are approximately 22m in height.

The refinery plant will be fitted with low oxides of nitrogen (NOx) burners. It will also have a dedicated abatement system (fume filtration system) for controlling emissions prior to release to atmosphere.

There will be a cooling water circuit with associated pumps and cooling tower, which will be used to cool the flue gas leaving the new refinery plant.

A water quench using caustic soda solution will be installed to reduce the exhaust gas temperature and to condition the gases prior to the downstream acid gas abatement to optimise the removal of acid gases. Water emissions from the quench system will be covered by a consent from Severn Trent. A requirement for further sampling and analysis of this effluent is required under improvement condition IC3.

A metal shredder will also be installed on site to shred a proportion of the larger pieces of incoming scrap copper prior to input to the reverberatory furnace. The shredder has a capacity of over 75 tonnes per day and is therefore listed in the permit under a 5.4 A(1)(b) activity. Approximately 34,000 tonnes of scrap copper is expected to be brought on to the site and stored in the cast yard in dedicated bunkers. The maximum storage capacity on site is 600 tonnes.

The maximum annual throughput of scrap metal will be 34,000 tonnes.

The new equipment will be located within an existing building on the site except for the shredder which will be located to the south of the existing building.

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 provides a record of the decision making process. It summarises the decision-making process to show how the main relevant factors have been taken into account. We have assessed the aspects that are changing as part of this variation, we have not revisited any other sections of the permit.

This decision document provides a record of the decision-making process. It

- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- shows how we have considered the [consultation responses](#)

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

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

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 confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

We consulted the following organisations:

Food Standards Agency

Environmental Health – Wolverhampton Council

Health and Safety Executive

Director of Public Health

Public Health England (PHE)

Comments were received from PHE only and our response is summarised in the [consultation responses](#) section.

The application was publicised on the GOV.UK website.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

This permit variation applies to only one part of the installation and is not applicable to the other part of the installation comprising an engine operated by E.ON.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

See section on 'air emissions' below for further information.

We have not consulted Natural England. The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory. See the following sections of the decision document for further information.

Emissions to air

The Operator has assessed emissions to air against the relevant environmental standards and the potential impact upon local human health and ecological receptors using detailed air modelling assessment.

The model also considers emissions, from the existing furnace and gas engine on the installation.

Assessment Methodology

A methodology for risk assessment of point source emissions to air is set out in our guidance *Air emissions risk assessment for your environmental permit* and has the following steps:

- Describe emissions and receptors.
- Calculate process contributions.
- Screen out insignificant emissions that do not warrant further investigation using the Environment Agency's screening tool.
- Decide if detailed air modelling is needed.
- Assess emissions against relevant standards.
- Summarise the effects of emissions.

We use this methodology to assess the impacts on air quality in the determination of applications.

The methodology uses a concept of "process contribution (PC)", which is the estimated concentration of emitted substances after dispersion into the receiving environmental media at the point where the magnitude of the concentration is greatest. The methodology provides a simple method of calculating PC, primarily for screening purposes, and for estimating process contributions where environmental consequences are relatively low. It is based on using dispersion factors. These factors assume worst case dispersion conditions with no allowance made for thermal or momentum plume rise and so the process contributions calculated are likely to be an overestimate of the actual maximum concentrations. More accurate calculation of process contributions can be

achieved by mathematical dispersion models, which take into account relevant parameters of the release and surrounding conditions, including local meteorology.

Air dispersion modelling enables the PC to be predicted at any environmental receptor that might be impacted by the emissions from a plant. Once short-term and long-term PCs have been calculated in this way, they are compared with Environmental Standards (ES).

PCs are considered insignificant if:

- The long-term process contribution is less than 1% of the relevant ES.
- The short-term process contribution is less than 10% of the relevant ES.

The long term 1% process contribution insignificance threshold is based on the judgements that:

- It is unlikely that an emission at this level will make a significant contribution to air quality.
- The threshold provides a substantial safety margin to protect health and the environment.

The short term 10% process contribution insignificance threshold is based on the judgements that:

- Spatial and temporal conditions mean that short term process contributions are transient and limited in comparison with long term process contributions.
- The threshold provides a substantial safety margin to protect health and the environment.

Where an emission is screened out in this way, we would normally consider that the Applicant's proposals for the prevention and control of the emission to be acceptable. However, where an emission cannot be screened out as insignificant, it does not mean it will necessarily be significant.

For those pollutants which do not screen out as insignificant, we determine whether exceedances of the relevant ES are likely. This is done through detailed audit and review of the Applicant's air dispersion modelling, taking background concentrations and modelling uncertainties into account.

Where the PC is greater than these thresholds, the assessment must continue to determine the impact by considering the predicted environmental concentration (PEC). The PEC is the combination of the PC substance to air and the background concentration of the substance which is already present in the environment.

The PECs can be considered 'not significant' if the assessment has shown that both the following apply:

- Proposed emissions comply with associated emission levels (AELs) or the equivalent requirements where there is no AEL.
- The resulting PECs won't exceed 100% of the environmental standards.

Air emissions assessment

The Operator has assessed emissions of a number of pollutants including particulates, oxides of nitrogen and dioxins and furans to air against the relevant environmental standards and the potential impact upon local human health and ecological receptors by undertaking a detailed air modelling assessment.

This assessment predicts the potential effects on local air quality from the stack emissions using the ADMS 5 dispersion model, which is a commonly used computer model for dispersion modelling.

The model used five years of meteorological data collected from the Birmingham weather station between 2015 and 2019.

The proximity of solid structures, such as buildings, to an emission source can affect the dispersion of a plume. Buildings associated with the on-site activities were incorporated into the air dispersion model. We are satisfied that dispersion effects from these structures have been suitably considered in the modelling assessment.

The impact of terrain upon plume dispersion was also considered in the dispersion modelling.

The scenario assessed within the model assumes the facility releases emissions at the emission limits continuously, during worst-case meteorological conditions for dispersion (based on the maximum concentrations from five years of weather data). The Environment Agency's worst-case assumption for conversion of oxides of nitrogen to nitrogen dioxide has been applied. We agree that this is a conservative approach and represents the worst case scenario.

Emission parameters for the new plant were based on the manufacturer's data sheet. Emission concentrations of pollutants were based on AELs, corresponding limit in the existing permit for the shaft furnace or based on manufacturer's data.

The way in which the Operator used dispersion models, the selection of input data, use of background data and the assumptions made have been reviewed by the Environment Agency to establish the robustness of the Operator's air impact assessment. The output from the Operator's model has been used to inform further assessment of health impacts and impact on habitats and conservation sites. We agree with the overall conclusions that there will not be a significant impact on local air quality. Figures from the Operator's assessment are used in the assessment summary below.

Predicted impacts at human receptors

Background Concentrations

The Operator considered background concentrations from local monitoring stations where NO₂ concentrations are measured using a continuous automatic instrument, the closest of which to the installation being Willenhall Road. In both 2015 and 2016 the annual mean background data from this monitoring site was 31 µg/m³. The years of 2012 and 2013 were higher than this at 44 µg/m³ and 37 µg/m³ respectively. The operator considered an average of the 5 years of data at 34.2 µg/m³. Although we do not consider this worst case, both long term emissions of NO_x screened out as 'insignificant' in line with our H1 assessment and therefore consideration of background was not considered applicable. See below for further information on this screening process.

The installation is located within the Wolverhampton Air Quality Management Area for PM₁₀ and NO₂. Our criteria for assessment is to consider whether the impact assessment to demonstrate that the NO₂ is insignificant in AQMAs. See below for further information on this screening process.

No Environmental Standards have been set for total volatile organic compounds (TVOCs) in ambient air. Therefore, the ambient air quality criteria for benzene has been used. We agree with the operator that this is a conservative approach.

There is also no Environmental Standard in ambient air set for phosphorus. A bespoke Environmental Assessment Level has previously been derived and agreed by the Environment Agency. We agree that this derived EAL is appropriate for use within this impact assessment.

Predicted impacts

The short term process contributions (PCs) from the installation at sensitive receptors are given in the table below.

Table 1 – Predicted impacts at the sensitive receptor where the highest PC is predicted (Short term)						
Pollutant	Environmental standard (ES) µg/m ³	Process Contribution (PC) µg/m ³	PC as % Environmental standard	Background µg/m ³ ^{Note 1}	Predicted Environmental Concentration (PEC) µg/m ³	PEC % of Environmental standard
PM10	50	0.02	0.04	NA	NA	NA
HCl	750	0.22	0.03	NA	NA	NA
SO ₂	266	5.6	2.11	NA	NA	NA
	350	5.2	1.49	NA	NA	NA
	125	2.7	2.16	NA	NA	NA

NO ₂	200	0.6	0.3	NA	NA	NA
Total Volatile Organic Compounds (TVOCs)	195	0.56	0.29	NA	NA	NA
Phosphorus	4	0.1	2.5	NA	NA	NA
Note 1: Where the PC is less than 10% of the ES and therefore considered insignificant we do not take the background into account.						

The short term modelling results demonstrate that emissions from the installation following the addition of the new furnace can be considered insignificant as the PC is less than 10% of the short term environmental standard for all pollutants.

The long term process contributions (PCs) from the installation at sensitive receptors are given in the table below.

Table 2 – Predicted impacts at the sensitive receptor where the highest PC is predicted (Long term)						
Pollutant	Environmental standard (ES) µg/m ³	Process Contribution (PC) µg/m ³ Note 1	PC as % Environmental standard	Background µg/m ³ Note 1	Predicted Environmental Concentration (PEC) µg/m ³	PEC % of Environmental standard
PM ₁₀	40	<0.00	<1%	NA	NA	NA
PM _{2.5}	25	<0.00	<1%	NA	NA	NA
NO ₂	40	0.05	0.13	NA	NA	NA
TVOCs	5	0.16	3.2	0.68	0.84	16.8
Phosphorus	2	0.01	0.5	NA	NA	NA
Note 1: Where the PC is less than 1% of the ES and therefore considered insignificant we do not take the background into account.						

Emissions of all pollutants except total volatile organic compounds (TVOCs) screen out as insignificant as the PC is less than 1% of the long terms ES and we have therefore not considered these emissions in further detail.

For long term TVOCs, the PC was 3.2% of the ES and therefore we have also taken the background into consideration. The PEC is 16.8% of the ES and therefore we can conclude that the emissions of TVOCs are unlikely to result in an exceedance of the ES as there is adequate headroom.

The applicant also included dioxins and furans in their assessment and the long term predicted PC at the maximum on the grid was $2.39\text{E-}10 \mu\text{g}/\text{m}^3$. There is no ES for dioxins and furans as the principal exposure route for these substances is by ingestion and the risk to human health is through the accumulation of these substances in the body over an extended period of time. The operator reviewed a number of background levels at the three closest Toxic Organic Micro Pollutants (TOMPS) network monitoring locations. This PC is predicted to be $0.13 \text{ fg}/\text{m}^3$ at the nearest human health receptor, approximately 1% of the background likely to be more representative of an urban environment. We consider these worst case predictions of levels unlikely to cause an impact on human health. An ELV will be set for emissions of dioxins and furans which is $0.1 \text{ ng}/\text{m}^3$ and this is considered BAT for this type of operation. Injection of activated carbon will facilitate removal of these pollutants. We consider it unlikely that this level of emission will have an impact on human health.

Predicted impacts at ecological receptors

There are no Sites of Special Scientific Interest within 2km of the installation.

There is one European Site within 10km of the installation which is Fens Pool Special Area of Conservation (SAC) at approximately 7km in distance from the installation.

There are more than 20 non statutory conservation sites including Local Nature Reserves and Local Wildlife Sites the closest of which is Land East of Dale Street Local Wildlife Site at 413m from the installation.

Assessment of the European Site

The process contribution for all modelled pollutants at Fens Pool SAC was less than 1% of the long terms critical level and less than 10% of the short term critical level. We therefore consider these PCs to be insignificant and have not carried out any further assessment.

The PC for acid and nitrogen deposition at Fens Pool SAC was less than 1% of the critical loads and we therefore consider these PCs to be insignificant and have not carried out any further assessment.

We consider that there will be no likely significant effect on Fens Pool SAC as a result of the proposal.

Assessment of Non-Statutory Sites

The annual mean PCs for all pollutants do not exceed 1% of the long term critical levels or loads and therefore can be screened out as insignificant.

The short term PCs for all pollutants do not exceed 10% of the short term critical levels or loads and therefore can be screened out as insignificant.

We do not consider the proposal will have a significant impact on the non-statutory sites.

Operating techniques

We have reviewed the techniques proposed by the operator and compared these with the relevant technical guidance and we consider them to represent appropriate techniques for the facility. In particular: the *BAT Conclusions for the non-ferrous metals industries* (EU 2016/1032).

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Abatement for emission to air

The refinery plant will be fitted with low oxides of nitrogen (NOx) burners. It will also have a dedicated abatement system (fume filtration system) for controlling emissions prior to release to atmosphere. The abatement unit comprises the following stages:

- Selective Non Catalytic Reduction (SNCR);
- Spray absorber;
- Dry sorption reactor including both hydrated lime and activated carbon injection; and
- Fabric bag filter.

As the refinery plant is fitted with low NOx burners, we consider that it may be able to achieve low emissions of NOx without use of SNCR. Use of SNCR would require storage of reagent on site and has the potential for ammonia slip. A pre operational condition (PO1) is included requiring the operator to justify why further NOx abatement is needed prior to use of the SNCR unit.

Compliance with BAT Conclusions

During the determination of the permit we requested further information relating to compliance with a number of BAT Conclusions. We have included the details relating to these in further information below.

BAT Conclusion 10

The use of the AV1 FM1 damper for the addition of diluent air is not considered BAT unless there is a valid technical reason. Any addition of diluent will impact on calculations when reporting to the specified O₂ correction in the methodology for the process.

The operator provided the following technical justification for the use of the damper:

The water quenching system is designed to decrease fume temperature to around 180°C, before it enters the baghouse. Should there be an issue within this quench system the AV1-FM1 safety device will activate.

The AV1-FM1 is a safety device there to protect the baghouse filter from overheating. If the temperature of the fumes exceeds 220°C, then there is a risk the filter bags can start to burn.

In the event that the fume temperature reached this critical temperature then the safety system comes into operation. Therefore AV1-FM1 is an emergency system that is normally closed; it's not used to affect any abatement, and is only for emergency to protect the filter bags.

We accept that the use of the AV1 FM1 damper is BAT in this instance.

BAT Conclusion 13

We did not consider adequate justification for NO_x control as set out in BAT 13 had been demonstrated. In response to our request for information the operator provided the following information:

For NO_x emission control, both the refining furnace and afterburner are equipped with NxT burners. This refers to Next Generation, or new generation burners that maintain functionality, reliability and performance, by incorporating energy saving and low polluting emissions NO_x Technology. Multistage technology together with high flue gas recirculation, guarantees low NO_x and CO emissions, therefore this burner technology falls into line with BAT 13.

We accept that the response confirms that the BAT Conclusion will be complied with.

BAT Conclusion 22

It is not clear from the application which of the techniques specified in this BAT Conclusion would be put into practice.

The operator confirmed the following responses to the techniques listed in the BAT Conclusion:

- a- feed material is solid copper and has no water content

- b- no steam will be generated as there is no requirement for heating the electrolyte
- c- Refinery furnace uses highly efficient burner technology
- d- No holding furnace used in system, the casting unit is fed directly from furnace
- e- Reverberatory furnace being used not shaft furnace

BAT Conclusion 25

The Application stated that this BAT Conclusion is not applicable but we did not agree with this conclusion due to the processes which are carried out on site such as shredding and homogenisation. The Applicant provided the following additional information:

In general, no pre-treatment of the incoming scrap material will be undertaken. The material will be stored in bunkers in line with the site's current scrap storage processes. All material supplied will be in the form of solid copper bars, rods, tube and wire. The majority of this material will be fed directly into the furnace via the conveyor with larger sections being cropped to size. Therefore, reviewing the techniques of BAT 25 we have concluded the following -:

- a- Due to the requirement of the incoming material for the refining process the feed material is solid copper with no dust or other cross contamination.
- b- The material is stored outside in high walled bunkers as solid copper in line with our current processes.
- c- The process requires dry material.
- d- No mixing, drying, screening or pelletisation, or any pre-treatment undertaken material is supplied as solid copper. As the material is in one copper alloy there is no requirement to blend or homogenise.
- e- As no pre-treatment is being undertaken there will be no releases of dusty or gaseous emissions.

We agree that the operator is compliant with BAT Conclusion 25.

BAT Conclusion 37

We requested further information from the operator in relation to BAT Conclusion 37 and in particular in reference to whether the shredder will be connected to a bag filter to minimise emissions of dust.

The operator confirmed that they do not consider that the waste processed will result in the requirement for a bag filter because the shredder is a stand-alone system cutting copper bus bar, rod and clean uncontaminated tube.

We have specified an improvement condition in the permit requiring the operator to assess this further once the shredder is in operation and demonstrate whether this is the case using operational data.

We consider the operator to be 'future compliant' with BAT Conclusion 37 once the associated improvement condition is complete.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Noise and vibration management

A noise impact assessment was submitted with the application and we have audited this.

The site and receptors are in a busy, industrial-urban area with the A41 (Oxford St) running between the site and receptors. The background noise levels are high and this is likely to be due largely to traffic on the A41. The consultant has applied high acoustic correction factors for day-time operations with somewhat lower values for night-time. The consultant predicts maximum day-time BS4142 impacts of +3 dBA and night-time impacts of -2 dBA. Such impacts are categorised as low. We are in agreement with these predictions based on the information provided. However, we do note that the sound power data for the shredder and furnace has a reasonably high degree of uncertainty. Therefore we have specified an improvement conditions requiring the applicant to commission a noise survey of the plant operations when everything is installed and running to check that the predicted impacts are not being exceeded.

We have reviewed the noise and vibration management plan in accordance with our guidance on noise assessment and control.

We consider that the noise and vibration management plan is satisfactory and we consider it to be appropriate measures based on information available to us at the current time. The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The noise management plan has been incorporated into the operating techniques S1.2.

Waste types

Waste types considered appropriate for acceptance at the site were already specified in table S2.2 in Schedule 2 of the permit. These will not change as a result of this variation.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme that requires the following:

- that the effluent from the quench bath is correctly sampled and analysed (improvement condition IC3);
- that an assessment is carried out to confirm whether the shredder requires any abatement for particulate matter to be fitted (improvement condition IC4); and
- that the actual operational noise of the shredder is assessed once commissioned (improvement IC5).

Emission limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on Best Available Techniques (BAT) have been added for the new reverberatory furnace stack and emission point from the extraction system serving the new shredder for the substances specified in table S3.1 in Schedule 3 of the permit.

We made these decisions in accordance with the BAT Conclusions for the non-ferrous metals industries.

Monitoring and reporting

We have decided that monitoring and reporting should be added for the following parameters, using the methods detailed and to the frequencies specified in the consolidated permit.

We made these decisions in accordance with the BAT Conclusions for the non-ferrous metals industries.

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Management system

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points.

A full review of the management system is undertaken during compliance checks.

Technical competence

The new shredding activity is a Specified Waste Management Activity and the operator will be required to have Technical Competence in place to carry out this operation.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit variation.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from Public Health England on 10/11/2020.

Points raised:

PHE notes that the process emissions from the variation are screened out as ‘insignificant’, as described in guidance; however, data suggests that background

levels of oxides of nitrogen approach the annual mean air quality standard for nitrogen dioxide and there are Air Quality concerns in the local area with an Air Quality Management Area declared by the local authority. Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants and address inequalities (in exposure) and encourage their consideration during site design, operational management, and regulation.

The applicant acknowledges that the proposed metal shredding activity may generate increased noise levels. Abatement is proposed and the applicant notes that further reviews of noise levels will be undertaken once the plant is commissioned. It may be appropriate to consult the local authority to derive a suitable local noise limit to minimise off-site impacts.

This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.

Summary of actions taken:

See 'emissions to air' and 'noise' sections above for assessment of risk and any action taken.

The Local Authority was consulted on this variation and no response was received.