Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

O.C.O Technology Limited

Leeds Aggregate Manufacturing Facility
Hub 45
Knowsthorpe Gate
Leeds
LS9 0NX

Variation application number

EPR/TP3737YG/V006

Permit number

EPR/TP3737YG

Leeds Aggregate Manufacturing Facility
Permit number EPR/TP3737YG

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. Only the variations specified in schedule 1 are subject to a right of appeal.

O.C.O operate an aggregate manufacturing facility in Leeds, West Yorkshire. The site uses recovered air pollution control (APCr) residues, incinerator bottom ash (IBA) and other suitable wastes to create carbon neutral aggregate pellets for the construction industry. The site is regulated under the Environmental Permitting (England and Wales) Regulations 2016 (EPR) and it is currently permitted to carry out the following activities:

- Schedule 1, Section 5.3 Part A(1) (a) (vi) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day: recycling or reclamation of inorganic materials other than metals or metal compounds.
- Schedule 1, Section 5.6 A(1) (a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities in S5.3.

The site has three production lines which currently process up to 420 tonnes of waste per day. This variation increases the annual throughput at the site from 90,000 to 120, 000 tonnes per year, and as a result the daily treatment capacity has increased to 520 tonnes per day across all three lines.

The site is located in an industrial area approximately 3.6 km from Leeds city centre. Halton Moor local nature reserve is approximately 0.9 km away from the site and Temple Newsam Estate Wood local wildlife site is approximately 1.5 km away from the site.

There are no emissions to air or water from the site.

The schedules specify the changes made to the permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	**Date**	**Comments**
Application EPR/TP3737YG/A001	Duly made 21/07/2017	New bespoke application for an aggregates manufacturing facility in Leeds.
Response to the Schedule 5 Notice, dated 30/10/17	Received 14/11/2017	Additional information received regarding the emergency plan, dust filters on the storage silos, waste pre-acceptance, acceptance and sampling procedures.
Response to the Schedule 5 Notice, dated 07/12/17	Received 05/01/2018	Additional information including sampling and testing procedures for the aggregate product, confirmation of site staff qualifications, identification of point source emissions to air, outline of reaction chemistry and consideration of the REACH regulations.

Status log of the permit		
Description	**Date**	**Comments**
Response to the extended Schedule 5 Notice, dated 18/01/18	Received 23/01/2018	Additional information received regarding chapter 10 waste code testing and process description.
	Received 29/01/2018	Revised site plan.
Permit determined EPR/TP3737YG/A001	02/03/2018	Permit issued to O.C.O Technology Limited.
Application EPR/TP3737YG/V002 (variation and consolidation)	Duly made 27/11/2018	Application to increase the annual throughput.
Variation determined EPR/TP3737YG/V002 (PAS billing ref: GP3831QP)	29/03/2019	Varied and consolidated permit issued.
Company name updated on Companies House	01/08/2019	Company name changed from Carbon8 Aggregates Limited to O.C.O Technology Limited
Application EPR/TP3737YG/V004	Duly Made 01/04/2020	Application to vary the permit to add additional EWC codes following trials.
Variation determined EPR/TP3737YG/V004	10/12/2020	Varied permit issued to O.C.O Technology Limited.
Application EPR/TP3737YG/V005	Duly Made 22/06/2020	Application to vary the permit to add a third additional duplicate aggregate processing line.
Variation determined EPR/TP3737YG/V005	17/03/2023	Varied permit issued to O.C.O. Technology Limited.
Application EPR/TP3737YG/V006	Duly Made 26/10/2023	Application to increase annual throughput of aggregate production.
Variation determined EPR/TP3737YG/V006	12/12/2023	Varied permit issued to O.C.O. Technology Limited.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/TP3737YG

Issued to

O.C.O Technology Limited ("the operator")

whose registered office is

Montague Place Quayside
Chatham Maritime
Chatham
Kent
ME4 4QU

company registration number **07247345**

to operate a regulated facility at

Leeds Aggregate Manufacturing Facility
Hub 45
Knowsthorpe Gate
Leeds
LS9 0NX

to the extent set out in the schedules.

The notice shall take effect from 12/12/2023

Name	Date
Eleanor Blackeby	**12/12/2023**

Authorised on behalf of the Environment Agency

Schedule 1

The following conditions were varied as a result of the application made by the operator:

- Table S1.1 referenced in conditions 2.1.1 & 2.3.7 was amended to increase the maximum treatment limit and to amend the activity description.
- Table S2.2 referenced in condition 2.3.4 was amended to increase the maximum annual throughput.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/TP3737YG

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/TP3737YG/V006 authorising,

O.C.O Technology Limited ("the operator"),

whose registered office is

Montague Place Quayside
Chatham Maritime
Chatham
Kent
ME4 4QU

company registration number 07247345

to operate an installation at

Leeds Aggregate Manufacturing Facility
Hub 45
Knowsthorpe Gate
Leeds
LS9 0NX

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Eleanor Blackeby	**12/12/2023**

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

(a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and

(b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.1.4 The operator shall comply with the requirements of an approved competence scheme.

1.2 Energy efficiency

1.2.1 The operator shall:

(a) take appropriate measures to ensure that energy is used efficiently in the activities;

(b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and

(c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

(a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;

(b) maintain records of raw materials and water used in the activities;

(c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and

(d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

(a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and

(b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and

(c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation ("plan") specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 Waste shall only be accepted if:

(a) it is of a type and quantity listed in schedule 2 tables S2.2, S2.3 and S2.4; and

(b) it conforms to the description in the documentation supplied by the producer and holder.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

(a) the nature of the process producing the waste;

(b) the composition of the waste;

(c) the handling requirements of the waste;

(d) the hazardous property associated with the waste, if applicable; and

(e) the waste code of the waste.

2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.3.7 Hazardous waste shall not be mixed, either with a different category of hazardous waste or with other waste, substances or materials, unless it is authorised by schedule 1 table S1.1 and appropriate measures are taken.

2.4 Pre-operational conditions

2.4.1 The operations specified in schedule 1 table S1.3 shall not commence until the measures specified in that table have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.

3.1.2 The limits given in schedule 3 shall not be exceeded.

3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.2.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;

(b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.3.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;

(b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any

approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:

(a) point source emissions specified in tables S3.1, S3.2 and S3.3;

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

(a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;

(b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.7 Fire prevention

3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

3.7.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;

(b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

(d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

(i) off-site environmental effects; and

(ii) matters which affect the condition of the land and groundwater.

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

4.2 Reporting

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

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

(a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;

(b) the annual production /treatment data set out in schedule 4 table S4.2; and

(c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

(a) in respect of the parameters and emission points specified in schedule 4 table S4.1;

(b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and

(c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

4.3.1 In the event:

(a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—

(i) inform the Environment Agency,

(ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and

(iii) take the measures necessary to prevent further possible incidents or accidents;

(b) of a breach of any permit condition the operator must immediately—

(i) inform the Environment Agency, and

(ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;

(c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

(a) any change in the operator's trading name, registered name or registered office address; and

(b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

(a) any change in the operator's name or address; and

(b) any steps taken with a view to the dissolution of the operator.

In any other case:

(a) the death of any of the named operators (where the operator consists of more than one named individual);

(b) any change in the operator's name(s) or address(es); and

(c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

(a) the Environment Agency shall be notified at least 14 days before making the change; and

(b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “immediately” in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity and WFD Annex I and II operations**	**Limits of specified activity and waste types**
AR1 (production line 1) AR2 (production line 2) AR3 (production line 3)	S5.3 Part A (1)(a)(vi) Disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day: recycling or reclamation of inorganic materials other than metals or metal compounds.	R5: Recycling/reclamation of other inorganic materials.	From the receipt of waste to the dispatch of aggregates from the installation. Treatment of hazardous waste to produce aggregates by carbonation reactions (using carbon dioxide) between APCr, IBA, fillers, binders and water, including blending and pelletising in the installation production lines 1, 2 and 3. Treatment shall only take place on an impermeable surface with a managed drainage system. Treatment operations to be undertaken in sealed vessels. There are to be no visible emissions of dust from the high level fans. No more than 520 tonnes of waste to be treated per day over production lines 1, 2 and 3. Waste types specified in table 2.1.
AR4	S5.6 Part A (1)(a) Temporary storage of hazardous waste with a total capacity exceeding 50 tonnes pending any of the activities in S5.3.	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage pending collection, on the site where it is produced).	No more than 2,375 tonnes of waste shall be stored at any one time. Waste to be stored in designated silos, which are located on an impermeable surface with a managed drainage system, as shown on the site plan, titled: "Site Layout Plan and Permit Boundary," in Schedule 7 of this permit. There are to be no visible emissions of dust from the silo dust vents. Waste shall not be stored for more than 6 months from the date of receipt. Waste types specified in table 2.1.
	Directly Associated Activity		
AR5	Management of processed materials.	Handling and storage of screened and treated materials produced by activities AR1, AR2 & AR3.	Handling and storage of processed materials shall only be undertaken on areas with an impermeable surface and sealed drainage system.
AR6	Storage of raw materials.	Storage of raw materials serving activities AR1, AR2 & AR3.	Raw materials limited to fillers, binders, water and carbon dioxide – all serving the aggregate manufacturing process. Handling and storage of raw materials shall only be undertaken on areas with an impermeable surface and sealed drainage system.

Table S1.1 activities			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity and WFD Annex I and II operations**	**Limits of specified activity and waste types**
AR7	The handling and storage of wastes.	R13 Storage prior to treatment of non-hazardous wastes.	Handling and storage of wastes shall only be undertaken in areas with an impermeable surface and sealed drainage system.
AR8	Management of surface water for reuse.	Surface water collection and storage from areas serving activity AR4.	Surface water from the silo pad to be collected in a closed man-hole and reused in the aggregate manufacturing process.
AR9	Management of surface water for discharge to sewer.	Collection, storage and discharge to sewer of clean, uncontaminated surface water run-off from the aggregate stock yard, screening area and clean areas around the silos.	From the collection of surface water run-off to disposal to foul sewer. Temporary storage of clean, uncontaminated surface water run-off in an attenuation tank prior to discharge. Discharged water shall be clear of visible oily residues.
AR10	-	Process trials for Treatment Stage 1	As agreed in response to condition 1 in table S1.3. Waste types as specified in table S2.3. Following successful process trials and approval from the Environment Agency, approved waste types may be accepted on site for the purposes of treatment stage 1, without the need for further permit variations.
AR11	-	Process Trials for Treatment Stage 2	As agreed in response to condition 1 in table S1.3. Waste types as specified in table S2.4. Following successful process trials and approval from the Environment Agency, approved waste types may be accepted on site for the purposes of treatment stage 2, without the need for further permit variations.

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
Application EPR/TP3737YG/A001	Responses to question 3 – Operating Techniques and Appendix 5 of part B3 of the application form and referenced supporting documentation: • Leeds Aggregate Manufacturing Facility: Best Available Technique Assessment.	Duly made 21/07/17
Responses to the Schedule 5 Notice, issued on 30/10/17	Responses to questions 6, 7 and 9 of the Schedule 5 Notice that provide additional information on: • Carbon8's waste sampling procedure (OP_GEN_401); • details of the storage silo vents; and the emergency plan (document reference: EP_AVO_000).	14/11/17
Responses to the second schedule 5	Responses to questions 1, 5, 6 and 7 of the Schedule 5 Notice that provide additional information on:	05/01/2018

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
notice issued on 07/12/17	• details of the installation's sewage discharge point; • confirmation of quality and technical managers qualifications; • point source emissions to air; and overview of the reaction chemistry involved in the ACT process.	
Responses to the extended schedule 5 issued on 18/01/18	Responses to questions 1 and 3 of the Schedule 5 Notice that provide additional information on: • process description.	23/01/2018
	• site plan.	29/01/2018
Application EPR/TP3737YG/V002	• Variation supporting document November 2018	20/11/2018
Application EPR/TP3737YG/V004	• Appendix F – Procedure for carrying out trials on new waste types. This procedure must be followed. • Only wastes from Tables S2.3 and S2.4 subject to successful trial in accordance with this procedure are permitted to be accepted for treatment.	01/04/2020
Application EPR/TP3737YG/V005	• Supporting statement, including response to application questions.	11/06/2020
Application EPR/TP3737YG/V005	• Response to questions 2-5 and 7 of the email dated 26/02/2021 confirming: I. Updated site layout plan; II. Site drainage arrangements; and III. Additional site measures to control noise and dust.	03/03/2021

Table S1.3 Pre-operational measures for future development		
Reference	**Operation**	**Pre-operational measures**
1	Trials using wastes specified in tables S2.3 and S2.4 of this permit	A written proposal shall be submitted to the Environment Agency and agreed with the Environment Agency. The proposal shall include the following information as a minimum: 1. Description of trials – including: • The length of time the trials will run; • A comparison of the process against BAT; • Measures taken to prevent accidents and mitigate their consequences; • Success criteria. 2. Waste storage arrangements: 3. Proposed trial capacity: • Per batch/run; • Per day; • Total. 4. Proposed waste types: • Generic waste description, waste producer and process; • EWC codes; • Chemical composition;

Table S1.3 Pre-operational measures for future development		
Reference	**Operation**	**Pre-operational measures**
		• Hazards that the process is targeting; • Other hazards not being targeted. 5. Proposed raw material types: • Generic description; • Chemical composition. 6. Description of any changes to emissions, including emission points, concentrations and quantities to air and water and to those described in the application. (including a review of the existing environmental risk assessment).

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	**Specification**
-	-

Table S2.2 Permitted waste types and quantities for hazardous waste treatment and storage	
Maximum quantity	**Maximum throughput of waste accepted for treatment or storage under activities AR1, AR2, AR3 & AR7 shall not exceed 120,000 tonnes per year.**
Waste code	**Description**
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**
01 04	**wastes from physical and chemical processing of non-metalliferous minerals**
01 04 09	waste sand and clays
10	**WASTES FROM THERMAL PROCESSES**
10 01	**wastes from power stations and other combustion plants (except 19)**
10 01 02	coal fly ash
10 01 14*	bottom ash, slag and boiler dust from co-incineration containing dangerous substances (bottom ash sourced from biomass, energy from waste plants only)
10 01 16*	fly ash from co-incineration containing dangerous substances
10 01 18*	wastes from gas cleaning containing dangerous substances
10 13	**wastes from manufacture of cement, lime and plaster and articles and products made from them**
10 13 04	wastes from calcination and hydration of lime
10 13 06	particulates and dust (except 10 13 12 and 10 13 13)
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**
17 05	**soil (including excavated soil from contaminated sites), stones and dredging spoil**
17 05 04	soil and stones other than those mentioned in 17 05 03
17 05 06	dredging spoil other than those mentioned in 17 05 05
19 01	**wastes from incineration or pyrolysis of waste**
19 01 07*	solid waste from gas treatment
19 01 11*	bottom ash and slag containing dangerous substances
19 01 13*	fly ash containing dangerous substances
19 01 14	fly ash other than those mentioned in 19 01 13 (if mixed with APC residues)
19 01 15*	boiler dust containing dangerous substances
19 01 17*	pyrolysis wastes containing dangerous substances
19 04	**vitrified waste and wastes from vitrification**
19 04 02*	fly ash and other flue-gas treatment wastes
19 11	**wastes from oil regeneration**
19 11 07*	wastes from flue-gas cleaning

Table S2.3 Potentially acceptable waste for treatment stage 1, pending successful trial and approval from the Environment Agency		
Maximum quantity	**Maximum throughput to be confirmed following approval of a submitted proposal to the Environment Agency.**	
Waste code	**Description**	**Detail**
10	**WASTES FROM THERMAL PROCESSES**	
10 01	**wastes from power stations and other combustion plants (except 19)**	
10 01 01	bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)	Suitable for use in the manufacture of carbonated aggregate.
10 01 02	coal fly ash	Suitable for use in the manufacture of carbonated aggregate.
10 01 03	fly ash from peat and untreated wood	Suitable for use in the manufacture of carbonated aggregate.
10 01 05	calcium-based reaction wastes from flue-gas desulphurisation in solid form	Suitable for use in the manufacture of carbonated aggregate.
10 01 15	bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14	Suitable for use in the manufacture of carbonated aggregate.
10 01 17	fly ash from co-incineration other than those mentioned in 10 01 16	Suitable for use in the manufacture of carbonated aggregate.
10 01 19	wastes from gas cleaning other than those mentioned in 10 01 05, 10 01 07 and 10 01 18	Suitable for use in the manufacture of carbonated aggregate.
10 01 24	Sand from fluidised beds	Suitable for use in the manufacture of carbonated aggregate.
10 02	**wastes from the iron and steel industry**	
10 02 01	wastes from the processing of slag	Suitable for use in the manufacture of carbonated aggregate.
10 02 07*	solid wastes from gas treatment containing hazardous substances	Suitable for use in the manufacture of carbonated aggregate.
10 02 08	solid wastes from gas treatment other than those mentioned in 10 02 07	Suitable for use in the manufacture of carbonated aggregate.
10 03	**wastes from aluminium thermal metallurgy**	
10 03 29*	wastes from treatment of salt slags and black drosses containing hazardous substances	Suitable for use in the manufacture of carbonated aggregate.
10 11	**wastes from manufacture of glass and glass products**	
10 11 15*	solid wastes from flue-gas treatment containing hazardous substances	Suitable for use in the manufacture of carbonated aggregate.
10 11 16	solid wastes from flue-gas treatment other than those mentioned in 10 11 15	Suitable for use in the manufacture of carbonated aggregate.
10 12	**wastes from manufacture of ceramic goods, bricks, tiles and construction products**	
10 12 09*	solid wastes from gas treatment containing hazardous substances	Suitable for use in the manufacture of carbonated aggregate.

Table S2.3 Potentially acceptable waste for treatment stage 1, pending successful trial and approval from the Environment Agency		
Maximum quantity	**Maximum throughput to be confirmed following approval of a submitted proposal to the Environment Agency.**	
Waste code	**Description**	**Detail**
10 12 10	solid wastes from gas treatment other than those mentioned in 10 12 09	Suitable for use in the manufacture of carbonated aggregate.
10 13	**wastes from manufacture of cement, lime and plaster and articles and products made from them**	
10 13 04	wastes from calcination and hydration of lime	Suitable for use in the manufacture of carbonated aggregate.
10 13 06	particulates and dust (except 10 13 12 and 10 13 13)	Suitable for use in the manufacture of carbonated aggregate.
10 13 11	wastes from cement-based composite materials other than those mentioned in 10 13 09 and 10 13 10	Suitable for use in the manufacture of carbonated aggregate.
10 13 12*	solid wastes from gas treatment containing hazardous substances	Suitable for use in the manufacture of carbonated aggregate.
10 13 13	solid wastes from gas treatment other than those mentioned in 10 13 12	Suitable for use in the manufacture of carbonated aggregate.
10 13 14	waste concrete and concrete sludge	Granular material only, probably pre-treated elsewhere to ensure the physical characteristics are acceptable. Sludge wastes will not be accepted.
15	**WASTE PACKAGING, ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED**	
15 02	**absorbents, filter materials, wiping cloths and protective clothing**	
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances	Granular material only (only mineral based absorption media e.g. calcium carbonate or silica powder) used for gas filtration, no textiles or fibre-based materials.
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02	Granular material only (only mineral based absorption media e.g. calcium carbonate or silica powder) used for gas filtration, no textiles or fibre-based materials.
16	**WASTES NOT OTHERWISE SPECIFIED IN THE LIST**	
16 08	**spent catalysts**	
16 08 03	spent catalysts containing transition metals or transition metal compounds not otherwise specified	Suitable for use in the manufacture of carbonated aggregate.
16 08 04	spent fluid catalytic cracking catalysts (except 16 08 07)	Suitable for use in the manufacture of carbonated aggregate.
16 08 07*	spent catalysts contaminated with hazardous substances	Suitable for use in the manufacture of carbonated aggregate.
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**	
19 01	**wastes from incineration or pyrolysis of waste**	
19 01 12	bottom ash and slag other than those mentioned in 19 01 11	Suitable for use in the manufacture of carbonated aggregate.

Table S2.3 Potentially acceptable waste for treatment stage 1, pending successful trial and approval from the Environment Agency		
Maximum quantity	**Maximum throughput to be confirmed following approval of a submitted proposal to the Environment Agency.**	
Waste code	**Description**	**Detail**
19 01 14	fly ash other than those mentioned in 19 01 13	Suitable for use in the manufacture of carbonated aggregate.
19 01 16	boiler dust other than those mentioned in 19 01 15	Suitable for use in the manufacture of carbonated aggregate.
19 01 18	pyrolysis wastes other than those mentioned in 19 01 17	Suitable for use in the manufacture of carbonated aggregate.
19 01 19	sands from fluidised beds	Suitable for use in the manufacture of carbonated aggregate.

Table S2.4 Potentially acceptable waste for treatment stage 2, pending successful trial and approval from the Environment Agency		
Maximum quantity	**Maximum throughput to be confirmed following approval of a submitted proposal to the Environment Agency.**	
Waste code	**Description**	**Detail**
01	**WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS**	
01 01	**wastes from mineral excavation**	
01 01 01	wastes from mineral metalliferous excavation	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials. Non-hazardous materials from mineral processing.
01 01 02	wastes from mineral non-metalliferous excavation	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials. Including materials such as overburden etc.
01 03	**wastes from physical and chemical processing of metalliferous minerals**	
01 03 06	tailings other than those mentioned in 01 03 04 and 01 03 05	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials. Non-hazardous materials from the separation of ore.
01 03 08	dusty and powdery wastes other than those mentioned in 01 03 07	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials. Non-hazardous materials from the separation of ore.
01 04	**wastes from physical and chemical processing of non-metalliferous minerals**	
01 04 08	waste gravel and crushed rocks other than those mentioned in 01 04 07	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.
01 04 09	waste sand and clays	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.

Table S2.4 Potentially acceptable waste for treatment stage 2, pending successful trial and approval from the Environment Agency		
Maximum quantity	**Maximum throughput to be confirmed following approval of a submitted proposal to the Environment Agency.**	
Waste code	**Description**	**Detail**
01 04 10	dusty and powdery wastes other than those mentioned in 01 04 07	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.
01 04 13	wastes from stone cutting and sawing other than those mentioned in 01 04 07	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.
10	**WASTES FROM THERMAL PROCESSES**	
10 03	**wastes from aluminium thermal metallurgy**	
10 03 30	wastes from treatment of salt slags and black drosses other than those mentioned in 10 03 29	Suitable for use in the manufacture of carbonated aggregate.
10 11	**wastes from manufacture of glass and glass products**	
10 11 05	particulates and dust	Granular materials only. Suitable for use in the manufacture of carbonated aggregate.
10 11 12	waste glass other than those mentioned in 10 11 11	Granular materials only, suitable for use as a sand replacement.
10 12	**wastes from manufacture of ceramic goods, bricks, tiles and construction products**	
10 12 03	particulates and dust	Granular materials only. Suitable for use in the manufacture of carbonated aggregate.
10 12 08	waste ceramics, bricks, tiles and construction products (after thermal processing)	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.
17	**CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)**	
17 05	**soil (including excavated soil from contaminated sites), stones and dredging spoil**	
17 05 04	soil and stones other than those mentioned in 17 05 03	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials. Soils will not be processed.
17 05 06	dredging spoil other than those mentioned in 17 05 05	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials. Soils and sludges will not be processed.
19	**WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE**	
19 04	**vitrified waste and wastes from vitrification**	
19 04 01	vitrified waste	Granular material only. Secondary waste derived from others already listed.
19 12	**wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified**	
19 12 05	glass	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.

Table S2.4 Potentially acceptable waste for treatment stage 2, pending successful trial and approval from the Environment Agency		
Maximum quantity	**Maximum throughput to be confirmed following approval of a submitted proposal to the Environment Agency.**	
Waste code	**Description**	**Detail**
19 12 09	minerals (for example sand, stones)	Granular materials only, suitable for use as a sand replacement, to avoid consumption of virgin materials.

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (incl. unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
High level fans on the first stage mixer housing, labelled A1 and A2 as shown on the site plan, titled: “Site Layout Plan and Permit Boundary,” dated 29/01/18.	Residues (incoming raw materials) from the high level fans on the first stage mixer housing.	No parameters set	No limits set	-	-	-
Vents on the storage silos labelled A3 – A10 as shown on the site plan, titled: “Site Layout Plan and Permit Boundary,” dated 29/01/18.	Residues (wastes to be treated) from silo vents, via filters.	No parameters set	No limits set	-	-	-
Vents on the binder storage silos, labelled A11 and A12 as shown on the site plan, titled: “Site Layout Plan and Permit Boundary,” dated 29/01/18.	Residues (binder materials) from silo vents, via filters.	No parameters set	No limits set	-	-	-

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (incl. Unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
Point marked “IL 32.15” discharge to sewer as shown on the site plan, titled: “Site Layout Plan and Permit Boundary,” dated 29/01/18.	Uncontaminated surface run off, via wedge pit, from aggregate stock yard, screening area and clean area around the storage silos.	No parameter set	No limits set	-	-	-

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	**Parameter**	**Monitoring frequency**	**Monitoring standard or method**	**Other specifications**
“Wedge pit” as shown on the site plan, titled: “Site Layout Plan and Permit Boundary,” dated 29/01/18.	Suspended solids.	Weekly	Visual inspection	In the event of a build-up of suspended solids, clean out the settlement and silt trap.

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	**Emission or monitoring point/reference**	**Reporting period**	**Period begins**
Process monitoring (suspended solids). Parameters as required by condition 3.5.1.	Wedge pit	Every 6 months	1 January, 1 July

Table S4.2 Annual production/treatment	
Parameter	**Units**
Production of aggregate	tonnes
Other wastes taken off site (treated materials that fail to meet end-of-waste criteria).	tonnes

Table S4.3 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
Water usage	Annually	tonnes
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Water usage.	Form water usage 1 or other form as agreed in writing by the Environment Agency.	01/03/18
Energy usage.	Form energy 1 or other form as agreed in writing by the Environment Agency.	01/03/18
Process monitoring (suspended solids).	Form process monitoring 1 or other form as agreed in writing by the Environment Agency.	01/03/18
Total raw material used.	Form performance 1 or other form as agreed in writing by the Environment Agency.	01/03/18
Waste returns.	E-waste Return Form or other form as agreed in writing by the Environment Agency	---

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	**Notification period**

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“disposal” means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex lll of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or

- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

“year” means calendar year ending 31 December.

When the following terms appear in the waste code list in Schedule 2, table 2.2, table 2.3 and table 2.4, for those tables, they have the meaning given below:

“hazardous substance” means a substance classified as hazardous as a consequence of fulfilling the criteria laid down in parts 2 to 5 of Annex I to Regulation (EC) No 1272/2008.

“heavy metal” means any compound of antimony, arsenic, cadmium, chromium (VI), copper, lead, mercury, nickel, selenium, tellurium, thallium and tin, as well as these materials in metallic form, as far as these are classified as hazardous substances.

“PCBs” means:

- polychlorinated biphenyls;
- polychlorinated terphenyls;
- monomethyl-tetrachlorodiphenyl methane, Monomethyl-dichloro-diphenyl methane, Monomethyldibromo-diphenyl methane;
- any mixture containing any of the above mentioned substances in a total of more than 0.005% by weight.

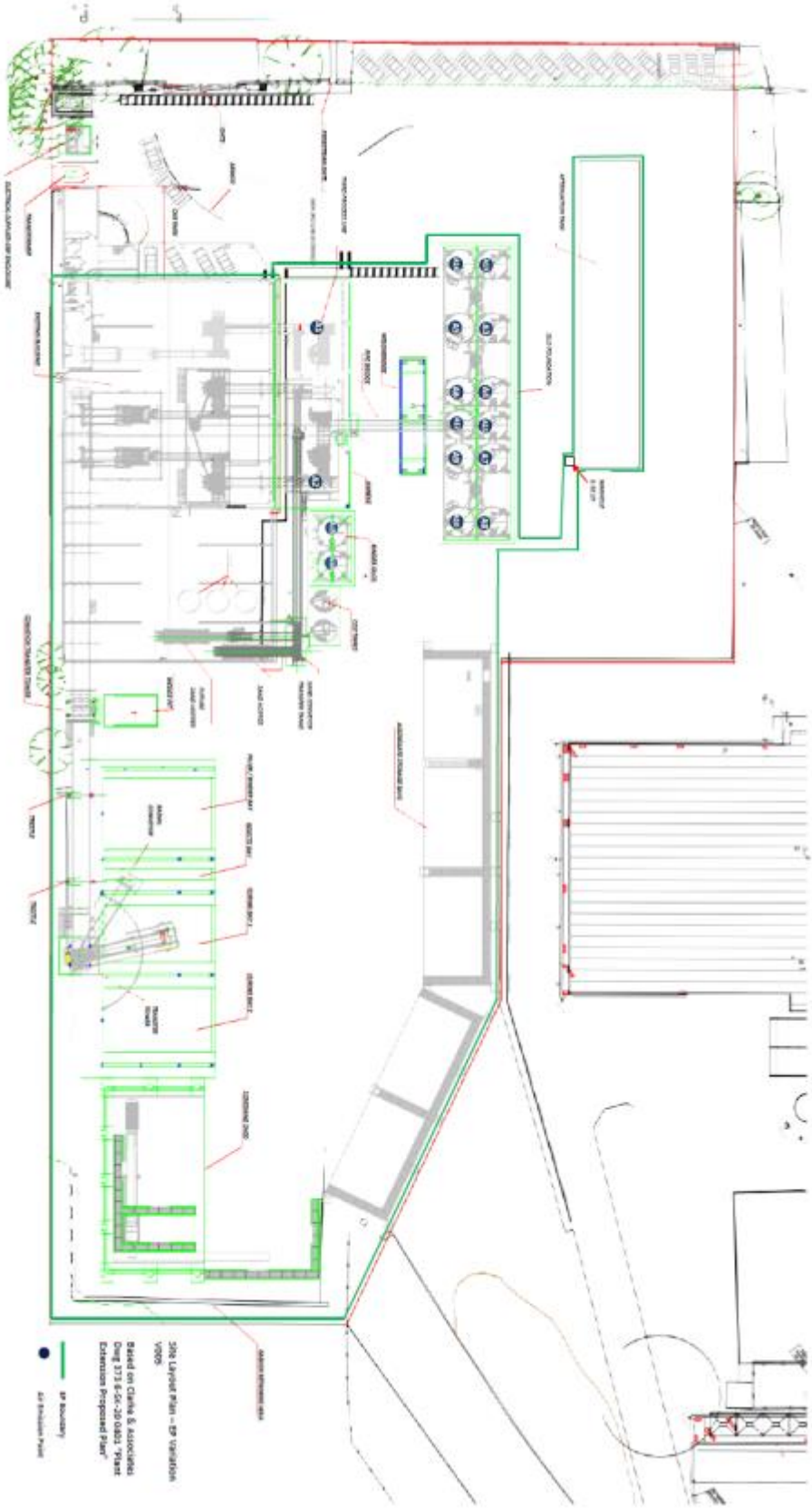
“transition metals” means any of the following metals: any compound of scandium, vanadium, manganese, cobalt, copper, yttrium, niobium, hafnium, tungsten, titanium, chromium, iron, nickel, zinc, zirconium, molybdenum and tantalum, as well as these materials in metallic form, as far as these are classified as hazardous substances.

“stabilisation” means processes which change the hazardousness of the constituents in the waste and transform hazardous waste into non-hazardous waste.

“solidification” means processes which only change the physical state of the waste by using additives without changing the chemical properties of the waste.

“partly stabilised wastes” means wastes containing, after the stabilisation process, hazardous constituents which have not been changed completely into non-hazardous constituents and could be released into the environment in the short, middle or long term.

Schedule 7 – Site plan



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