

Permitting Decisions- Environment Agency Initiated Variation

We have decided to issue an Environment Agency initiated variation for the Fridge Destruction Plant, Darlaston operated by European Metal Recycling Limited following a review of the permit in accordance with Environmental Permitting (England and Wales) Regulations 2016, regulation 34(1).

The variation number is EPR/GP3292FT/V010.

In addition to implementing the permit review, this variation also makes the changes to the permit that were applied for by the operator under permit variation application EPR/GP3292FT/V009.

Permit Review

This Environment Agency has a duty, under the Environmental Permitting (England and Wales) Regulations 2016 (EPR), regulation 34(1), to periodically review permits. Article 21(3) of the Industrial Emissions Directive (IED) also requires the Environment Agency to review conditions in permits to ensure that they deliver compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

With the exception of the existing fridge destruction plant which is due to be decommissioned, we have reviewed the permit for this regulated facility and varied the permit to make a number of changes to reflect relevant standards and best practice. These changes principally relate to the implementation of our technical guidance for [WEEE treatment and transfer and Treating metal waste in shredders](#), including the relevant requirements of the [BAT Conclusions for Waste Treatment](#) which have been incorporated into our guidance.

In this decision document, we set out the reasoning for the variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the operator in the operation and control of the plant and activities of the installation (operating techniques) against our technical guidance.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single

document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

Permit variation application

In addition to implementing the permit review, this variation also makes the following changes to the permit that were applied for by the operator under permit variation application EPR/GP3292FT/V009:

To add the new fridge destruction plant to the permitted activities by an amendment to Table S1.1 under:

- S5.4 A(1) (b) (iv) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving treatment in shredders of metal waste, including waste electrical and electronic equipment and end-of-life vehicles and their components;

The new plant is located approximately 50m to the North-East of the existing plant and has required an increase in the permitted area by adjusting the permit boundary of the adjacent EMR site (EPR/LP3492FA). A partial surrender application was made for EPR/LP3492LA and completed on 17/04/2024. The surrendered area is incorporated into new site plans for this permit.

Purpose of this document

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

- explains how the Environment Agency initiated variation has been determined;
- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account;
- highlights [key issues](#) in the determination.

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

Key issues of the decision

1. Joint determination

The Regulation 61 Notice for the site was sent to the operator on 20/04/2022 and a response was received on 29/08/2022 (GP3292FT/V010). The response included details of the existing fridge destruction plant (referred to as 'Green Plant' and 'Blue Plant') and the operator has confirmed that existing plant does not meet all the standards set out in our technical guidance. However, it was confirmed in the response to the Notice that an operator led variation had been submitted to the Environment Agency to replace the existing fridge destruction plant with a new one and this application (GP3292FT/V009) was 'duly made on 01/08/2023. The new fridge destruction plant will allow the site to comply with all the standards set out in our technical guidance. In the interim, and to allow for continued fridge recycling operations at the site, the new fridge destruction plant will be installed and commissioned while 'Green Plant' and 'Blue Plant' continue to operate. Once the new plant is commissioned and operational, the operator intends to decommission and deconstruct the existing plant.

Both applications V009 and V010 have been determined together. The Environment Agency Review has assessed all aspects of the operation against the relevant standards and best practice with the exception of the existing fridge destruction plant due to it being decommissioned. For the operator led variation, the new fridge plant has been assessed against the relevant standards and best practice. A pre operational condition has been added to the permit which requires the operator to submit a validation report to confirm and demonstrate that the plant has been successfully commissioned and satisfies the requirements of Section 2.1 Plant commissioning requirements of technical guidance Waste temperature exchange equipment: appropriate measures for permitting facilities, dated 13 July 2022.

A limit has been included in Table S1.1 of the permit for activities AR1 (existing Fridge Destruction Plant – Green Plant) and AR2 (existing Fridge Destruction Plant – Blue Plant) to cease treatment within 6 months of permit issue. An Improvement Condition (IC7) has also been added at table S1.5 requiring the Operator to submit a plant decommissioning plan for AR1 and AR2 which must include a timetable for completion of decommissioning and demonstrate it will meet the requirements set out in Section 2.6 Plant decommissioning requirements of technical guidance Waste electrical and electronic equipment (WEEE): appropriate measures for permitting facilities, dated 13 July 2022.

If the operator fails to meet the required deadline in Table S1.1, an application to vary the permit will be required to allow for the continued operation of the existing fridge destruction plant (AR1 and AR2) and the application will need to demonstrate that the plant can be operated in accordance with Appropriate Measures.

2. Regenerative Thermal Oxidiser

The operator proposes to use a Regenerative Thermal Oxidiser (RTO) for the treatment of recovered gases. The RTO is considered an alternative technology and is not listed in the Appropriate Measures guidance¹ as a treatment method. Section 5.2. point 14 of appropriate measures considers that on-site treatment of the recovered gases should demonstrate a 99.99% destruction of the gas.

The operator has confirmed that any VHC gases recovered at Stage 1 and Stage 2 of the installation process are oxidised in the RTO unit. This unit is designed to oxidise all gases entering the RTO into carbon dioxide and water vapour. As such it meets appropriate measures requirements for the treatment of WEEE (and WTEE) for point source emissions to air and will be demonstrated to show an efficiency rate of 99.99% conversion.

In accordance with appropriate measures, there are separate measuring points located before and after the RTO unit (MP3 and MP4 respectively). Both units will continuously monitor the concentrations of blowing agent gas recovered (MP3) and the concentration of gas not oxidised (MP4) exiting the RTO stack. The difference between these two gas concentrations, expressed as a percentage of the gas recovered $((MP3 - MP4) \div MP3) \times 100$ represents the destruction efficiency.

We are satisfied that the alternative treatment technology meets the standards set for destruction of the gas set out in the technical guidance.

Environment Agency led variation – permit review

We have carried out an Environment Agency initiated variation to the permit following a permit review as required by legislation to ensure that permit conditions deliver compliance with relevant legislative requirements and appropriate standards to protect the environment and human health.

The Industrial Emissions Directive (IED) came into force on 7 January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) Conclusions as described in the Commission Implementing Decision. Article 21(3) of the IED requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication of updated decisions on Best Available Techniques (BAT) Conclusions.

The BAT Conclusions for Waste Treatment (the BREF) was published on 17 August 2018 following a European Union wide review of BAT, implementing decision (EU) 2018/1147 of 10 August 2018. Relevant existing facilities were

¹ [Waste temperature exchange equipment: appropriate measures for permitted facilities - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/waste-temperature-exchange-equipment-appropriate-measures-for-permitted-facilities)

expected to be in compliance with the BAT Conclusions within 4 years (i.e. by August 2022).

On 13th July 2022 our WEEE (waste electrical and electronic equipment) appropriate measures guidance was published on gov.uk. This guidance includes additional appropriate measures for WTEE (waste temperature exchange equipment).

This technical guidance explains the standards (appropriate measures) that are relevant to regulated facilities with an environmental permit to treat or transfer WEEE (including WTEE) and incorporates the relevant requirements of the BAT Conclusions.

On 20th October 2021 our Treating metal waste in shredders appropriate measures guidance was published on gov.uk. This technical guidance explains the standards that are relevant to regulated facilities with an environmental permit to mechanically treat metal waste in shredders and incorporates the relevant requirements of the BAT Conclusions.

We issued a notice under regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 20/04/2022 requiring the operator to provide information to confirm that the operation of their facility currently meets, or how it will subsequently meet, the standards (appropriate measures) described in our technical guidance.

The notice required that where the revised standards are not currently met, the operator should provide information that:

- Describes the techniques that will be implemented to ensure operations meet the relevant standards and by when, or
- Explains why they are not applicable to the facility in question, or
- Justifies why an alternative technique is appropriate and will achieve an equivalent level of environmental protection to the standards described in our guidance

The standards described in our technical guidance are split into 7 chapters:

- General management appropriate measures
- Waste pre-acceptance, acceptance and tracking appropriate measures
- Waste storage, segregation and handling appropriate measures
- Waste treatment appropriate measures
- Emissions control appropriate measures
- Emissions monitoring and limits appropriate measures
- Process efficiency appropriate measures

The WTEE appropriate measures guidance, which supplements the WEEE technical guidance, includes an additional chapter on Process monitoring.

We have set emission limit values (ELVs) and monitoring requirements for relevant substances in line with our technical guidance and the BAT Conclusions for Waste Treatment, unless a tighter, i.e. more stringent, limit was previously imposed and these limits have been carried forward.

The Regulation 61 notice required the operator to confirm whether they could comply the standards described in each of these chapters. Table 1 below provides a summary of the response received and our assessment of it. The overall status of compliance with the standards (appropriate measures) is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (through improvement conditions set in permit)

NC – Not Compliant

In accordance with Article 22(2) of the Industrial Emissions Directive, the Regulation 61 notice asked the operator to provide a soil and groundwater risk assessment, along with a baseline report or summary report confirming the current state of soil and groundwater contamination, where listed activities are undertaken that involve the use, production or release of relevant hazardous substances.

The Regulation 61 notice also asked the operator to confirm whether they operate a medium combustion plant or specified generator (as per Schedule 25A or 25B of EPR 2016) and whether they had considered how their operations could be affected by climate changes (e.g. through a climate change adaptation plan).

Our assessment of the responses received from the operator regarding soil and groundwater risk assessment, medium combustion plant and specified generators, and consideration of climate change are also summarised in Table 1.

The Regulation 61 notice response from the Operator was received on 29/08/2022.

Although we were able to consider the Regulation 61 notice response generally satisfactory at receipt, we needed more information in order to complete our permit review assessment. We requested this by further information requests and the operator provided further information on 25/10/2023, 12/04/2024 and 20/05/2024. We made a copy of this information available on our public register.

Table 1 – Summary of our assessment of the operator’s Reg 61 response

Appropriate measures	Compliance status	Assessment of the installation's compliance with relevant standards (appropriate measures) and any alternative techniques proposed by the operator
General management appropriate measures	FC	<p>The operator confirmed that they currently meet the requirements of all appropriate measures in this section with the exception of Appropriate Measure Section 2.6 which requires decommissioning plan. The Operator has confirmed that plans for the decommissioning of the 'Green Plant' and 'Blue Plant' are currently being completed and will be in line with BAT and Appropriate Measures guidance.</p> <p>Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2. Improvement Condition IC7 has been added to the permit to require the decommissioning of the existing fridge destruction plant.</p>
Waste pre-acceptance, acceptance and tracking appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Waste storage, segregation and handling appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Waste treatment appropriate measures	FC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section in relation to general waste treatment other than the existing fridge destruction plant.</p> <p>Waste treatment appropriate measures for the new fridge destruction plant are covered by the Operator variation V009.</p> <p>Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p> <p>Table S1.1 includes a limit on the existing fridge plant (green line and blue line) being able to operate 6 months from permit issue. In addition, Improvement Condition IC7 has been added to the permit to require the decommissioning of the existing fridge destruction plant. If the existing plant is not decommissioned, the operator will need to vary the permit to permit it's continued operation and the application will need to demonstrate compliance with appropriate measures.</p>
Emissions control	FC	<p>The operator confirmed that the existing fridge destruction plant (green line) is not compliant with the appropriate</p>

<p>appropriate measures</p>		<p>measures in respect of assessing the point source emissions to air (point 3, Section 6.2). Table S1.1 includes a limit on the existing fridge plant (green line and blue line) being able to operate 6 months from permit issue. In addition, Improvement Condition IC7 has been added to the permit to require the decommissioning of the existing fridge destruction plant. If the existing plant is not decommissioned, the operator will need to vary the permit to permit it's continued operation and the application will need to demonstrate compliance with appropriate measures.</p> <p>Emissions control appropriate measures for the new fridge destruction plant are covered by the Operator variation V009.</p> <p>The operator confirmed that they currently meet the requirements of the appropriate measures in section 6.2. The operator has confirmed point 5 of Section 6.2 and points 12-19 of section 6.2 regarding fugitive emissions of odour and the need for an odour management plan is not applicable as the permitted wastes are unlikely to be and the site does not generate odour complaints. We are satisfied that appropriate measures do not apply to the installation.</p> <p>The applicability of Section 6.3 of the appropriate measures is restricted to cases where noise or vibration nuisance at sensitive receptors is expected and/or has been substantiated. The site does not generate noise/vibration complaints. We are satisfied that appropriate measures do not apply to the installation.</p> <p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section in relation to section 6.4 section 6.5 in respect of fugitive emissions to land and water.</p> <p>Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
<p>Emissions monitoring and limits appropriate measures</p>	<p>FC</p>	<p>The operator confirmed that the existing fridge destruction plant (green line) is not compliant with the appropriate measures in respect of meeting the relevant emission limits for point source emissions to air.</p> <p>Table S1.1 includes a limit on the existing fridge plant (green line and blue line) being able to operate 6 months from permit issue. In addition, Improvement Condition IC7 has been added to the permit to require the decommissioning of the existing fridge destruction plant. If the existing plant is not decommissioned, the operator will need to vary the permit to permit it's continued operation and the application will need to demonstrate compliance with appropriate measures.</p>

		<p>Emissions monitoring and limits appropriate measures for point source emissions to air for the new fridge destruction plant are covered by the Operator variation V009.</p> <p>The operator has provided information to support compliance with the appropriate measures in section 7.2 in respect of emissions to water. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with the guidance.</p> <p>Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Process efficiency appropriate measures	CC	<p>The operator confirmed that they currently meet the requirements of the appropriate measures in this section. Compliance with the appropriate measures in this section of the guidance has been incorporated into the varied permit through the updated operating techniques listed in Table S1.2.</p>
Process monitoring appropriate measures	FC	<p>The operator confirmed that they are not compliant with the WTEE process monitoring appropriate measures. The process monitoring appropriate measures for the new fridge destruction plant are covered by the Operator variation V009.</p> <p>Table S1.1 includes a limit on the existing fridge plant (green line and blue line) being able to operate 6 months from permit issue. In addition, Improvement Condition IC7 has been added to the permit to require the decommissioning of the existing fridge destruction plant. If the existing plant is not decommissioned, the operator will need to vary the permit to permit it's continued operation and the application will need to demonstrate compliance with appropriate measures.</p>
Reg 61 requirement Assessment of response received		
Soil and groundwater risk assessment	The operator has confirmed a site condition report in place	
Medium combustion plant and specified generators	Not applicable	
Summary of other changes made to the permit as a result of our assessment of the Reg 61 response		
	None	

Variation application made by operator

This section summarises the key issues that we considered in relation to permit variation application GP3292FT/V009, which was made by the operator on 01/08/2023 (duly made date) and separate to the permit review detailed above.

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.

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.

The site

The operator has provided plans which we consider to be satisfactory.

These show the extent of the site of the facility including the discharge points.

The plan is included in the permit.

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.

The decision was taken in accordance with our guidance.

Environmental risk assessment

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

The operator's risk assessment is satisfactory.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

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

Updating permit conditions during consolidation

We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

Changes to the permit conditions

We have varied the permit as stated in the variation notice.

Fire Prevention plan

We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance.

We have approved the fire prevention plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to represent all appropriate measures covering every circumstance throughout the life of the permit.

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

Dust management

We have reviewed the dust and emission management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and emission management plan is satisfactory and we approve this plan.

We have approved the dust and emission management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

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 plan has been incorporated into the operating techniques S1.2.

Improvement programme

We have included an improvement programme to ensure that the site is operated in accordance with the following appropriate measures

- Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities
- Waste temperature exchange equipment: appropriate measures for permitted facilities

Specifically that the existing fridge destruction plant (green line and blue line) is decommissioned in accordance with the guidance (IC7). The new fridge destruction plant can meet the process monitoring requirements of the appropriate measures (IP5 and IC9) and that the H1 risk assessment for the point source emissions to air submitted in support of the application remains valid once the new plant is operational (IC8).

The improvement conditions were considered necessary as the new fridge destruction plant is still in the commissioning phase and will need to demonstrate it can meet all the necessary appropriate measures required once operational.

Emission limits

Emission Limit Values (ELV's) and equivalent parameters or technical measures, based on Best Available Techniques (BAT), have been added for the following substances in respect of the new fridge destruction plant:

Dust	5 mg/m ³
CFCs	10 mg/m ³
Total VOCs (concentration)	15 mg/m ³
Total VOCs (mass emission)	Mass loss limit, set on a pro-rata basis, based upon a mass limit of 5g per 100 units treated per hour
Air flow	-
Brominated flame retardants	-
Dioxin-like polychlorinated biphenyls (PCBs)	-
Metals (As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Tl, V)	-
Dioxins and furans (PCDD/F)	-
Metals (As, Cd, Co, Cr, Cu, Mn, Ni, Pb, Sb, Se, Tl, V)	-

Oxides of nitrogen	130 mg/m ³
Carbon monoxide	-

We have included these limits based on the limits specified in the [Waste Treatment BAT Conclusions](#)/technical guidance.

Monitoring

We have decided that monitoring should be amended for the following parameters, using the methods detailed and to the frequencies specified:

Point Source Emissions to Air

The following sources/parameters have been added to the permit

The point source emission from the RTO new fridge destruction plant to be monitored for:

- Dust, CFCs, Total VOCs (concentration and mass emission), air flow, brominated flame retardants, PCBs, metals, dioxins and furans, oxides of nitrogen and carbon dioxide

Process Monitoring

Table S3.3 of the permit (process monitoring) has been amended to include all the process monitoring requirements set out in the Appropriate Measures guidance ²

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.

Reporting

We have specified reporting in the permit.

We made these decisions in accordance with Appropriate Measures guidance ^{2, 3}

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 100 of that Act in deciding whether to grant the variation of this permit.

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.”

² [Waste temperature exchange equipment: appropriate measures for permitted facilities - 6. Process monitoring appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](#)

³ [Waste electrical and electronic equipment \(WEEE\): appropriate measures for permitted facilities - 7. Emissions monitoring and limits appropriate measures - Guidance - GOV.UK \(www.gov.uk\)](#)

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:

Response received from Canal & River Trust.

Brief summary of issues raised: The Canal & River Trust are concerned that the adjacent canal has experienced some severe hydrocarbon pollution incidents in the past from a number of outfalls, although this cannot be directly attributed to the EMR site. It is recommended that

- Inspections of the interceptor and regular servicing/maintenance must be required.
- Ensuring that pollution response equipment is deployed in the event of failure is required.
- A Dissolved Oxygen meeting on site to go along visual inspection would also be beneficial.
- EMR should contact the Canal & River Trust in event of an incident. Details should be passed to the West Midlands Heritage & Environment Team at wmheritage.environment@canalrivertrust.org.uk.

Summary of actions taken:

Table S 3.2 of the permit requires the operator to monitor the discharge point into the canal for signs of visible oil and grease on a weekly basis and to report findings.

The operator has submitted an Accident Management Plan which includes actions taken in the event of a spillage. This includes isolating drains and only reopening them once the site is free from contamination. The management plan

states that they will maintain a supply of suitable absorbent materials, booms, drain bungs and other equipment. The plan has been incorporated into the operating techniques S1.2.

Response received from UKHSA

Brief summary of issues raised: We request that the Environment Agency takes account of the following concerns when considering appropriate permit conditions:

- The Risk Assessment of Emissions to Air was not provided with the consultation documentation. We could not identify specific emissions to air and predicted environmental concentrations at residential locations.
- We recommend that the Environment Agency ensures that they are satisfied that the existing Accident Management Plan will be updated as necessary in line with changes outlined in the variation.

Summary of actions taken:

AQMAU has completed an audit of the permit application. We agree that contributions from the plant are not likely to lead to an exceedance of the Environmental Standards at any location of exposure for human health.

We have assessed the Accident Management Plan as part of the permit determination and are satisfied it meets our standards. The plan has been incorporated into the operating techniques S1.2.