

Permitting Decisions- Bespoke Permit

We have decided to grant the permit for DEScycle Metals Recovery Installation operated by Argo Natural Resources Limited.

The permit number is EPR/XP3429LR/A001

The permit was granted on 13/08/2026.

The application is for a solvent-based metal recovery activity to recover materials from waste Printed Circuit Boards (PCBs). It is regulated under the Environmental Permitting Regulations 2016 ("the Regulations), specifically under the following activities:

- Section 2.2 A(1) (a) Producing non-ferrous metals from ore, concentrates or secondary raw materials by metallurgical, chemical or electrolytic activities
- Section 4.2 A(1) (a) (iii) Producing inorganic chemicals such as bases

Additionally, there is a waste treatment operation (shredding and micronising) that takes place ahead of the chemical process to prepare the waste printed circuit boards for entry into the recovery reaction vessels.

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 in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- highlights [key issues](#) in the determination
- 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.

Key issues of the decision

- Choice of scheduled activities – consideration of the “most apt” scheduled activity as a result of recovery of critical minerals from waste streams falling into several sections under *The Environmental Permitting (England and Wales) Regulations 2016* (“the Regulations” of “EPR”)
- Choice of Best Available Techniques (BAT) guidance documents
- Emissions to air from the use of waste containing hazardous substances
- Management of per- and polyfluoroalkyl substances (PFAS) and the use of an Improvement Programme in a new bespoke permit.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has been made.

We have accepted the claim for confidentiality.

We have excluded documents and parts of documents which contain detailed information on how the process can be replicated and the materials required which if released would prejudice the operator’s competitive position.

We consider that the inclusion of the relevant information on the public register would prejudice the applicant’s interests to an unreasonable degree.

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.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Environmental Protection
- Fire & Rescue
- Director of Public Health
- Health and Safety Executive
- UK Health Security Agency

The comments and our responses are summarised in the [consultation responses](#) section.

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

Process Summary

The operator receives waste PCBs classified under EWC 16 02 15* - hazardous components removed from discarded equipment. Upon receipt, the waste is visually inspected and manually sorted/treated to remove components such as batteries and magnets before being fed into an enclosed shredder, where the material is reduced to a particle size of less than 3mm.

The shredded material is transferred under vacuum to sealed drums before undergoing further size reduction in a microniser to produce a powder with a particle size of less than 0.1mm. There are no emission points on either the shredder or microniser. The material is further transferred by vacuum system into drums and stored pending further treatment.

Samples of the micronised material are analysed to determine metal content and composition prior to chemical processing. The material is then treated in a series of solvent-based process vessels to recover precious metals and mixed metal hydroxides.

Process solvents are recovered and reused back into the process. Non-metallic fractions, principally plastics and glass along with liquid waste streams generated by the process are sent offsite for disposal by third party contractor.

There are two emission point sources to air from the installation:

- A1 - serves the process vessels (slurry vessel, DES1 vessel, DES2 vessel) and is fitted with activated carbon abatement
- A2 - serves the dryer/hood extraction system.

There are no discharges to groundwater, surface waters or sewers.

We considered the extent and nature of the facility at the site in accordance with:

- Regulatory Guidance Note (RGN)2 *Understanding the meaning of regulated facility*
- Appendix 2 of RGN2 *Defining the scope of the installation*
- Appendix 1 of RGN 2 *Interpretation of Schedule 1*

- Best Available Techniques (BAT) Reference Document for the Non-Ferrous Metals Industries (2017)
- Waste batteries: appropriate measures for permitted facilities (May 2026)

The recovery of materials from shredded printed circuit boards (PCBs) using hydrometallurgical processes is not regulated as a single holistic activity under the Regulations. The need to recover critical materials for use in the manufacture of new materials is an emerging sector; in this case, the “raw” materials are wastes and the solvent-based recovery process is considered to be novel and currently confidential.

With no definitive activity description, we must consider the “most apt” description for the stages of processing and to do this, we consider the intent of the process in terms of the outputs at the end of all recovery stages and if any intermediate, saleable products result part way through the process. For this application, there are metal hydroxides and elemental metals that fall under activity descriptions in EPR Schedule 1, Part 2, Chapters 2 (Metals) and 4 (Chemicals):

- Section 2.2 A(1) (a) Producing non-ferrous metals from ore, concentrates or secondary raw materials by metallurgical, chemical or electrolytic activities
- Section 4.2 A(1) (a) (iii) Producing inorganic chemicals such as bases

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 emission points.

The plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

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. The following sites lie within our screening distance:

- North York Moors Special Area of Conservation (SAC) – 7.5km to the south east
- Teesmouth and Cleveland Coast Special Protection Area (SPA)/Ramsar – 4km to the north east
- Lovell Hill Pools Site of Special Scientific Interest (SSSI) - 2km to the south
- Wilton Wood Ancient Woodland - 1km to the south

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.

The operator provided an assessment of emissions on these habitat sites. They concluded that the process concentrations (PC) are insignificant at all designated ecological sites. We have audited the consultant's assessment and undertook our own audit modelling and sensitivity analyses and agree with the applicant's conclusions. In addition, we modelled additional receptors to represent exposure at an unnamed ancient woodland 500m south of the installation.

The operator did not assess nutrient nitrogen or acid deposition. We undertook our own assessment and considered predicted emissions will have an insignificant impact on protected conservation designations.

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

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.

General 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 table S1.2 in the environmental permit.

Choice of Best Available Techniques reference document (BRef):

The applicant proposed that the following guidance documents are relevant for their activities:

- Waste Treatment BAT Reference Document (WT BREF)
- Waste batteries: appropriate measures for permitted facilities
- Waste electrical and electronic equipment (WEEE): appropriate measures for permitted facilities
- Treating metal waste in shredders: appropriate measures for permitted facilities
- Inorganic Chemicals Sector Guidance (EPR 4.03)
- Non-Ferrous Metals Industries BREF (including BAT conclusions)
- Speciality Inorganic Chemicals BREF

We have also considered the Environment Agency's Sector Guidance Note *S5.06: Recovery and Disposal of hazardous and non-hazardous waste* and whether the operator had considered the wider BAT expectations contained within the guidance:

- Prevention and minimisation of emissions.
- Selection and performance of abatement systems.
- Monitoring of key pollutants.
- Protection of sensitive ecological receptors.
- Demonstration that emissions do not result in unacceptable environmental impacts.

We consider the *Non-Ferrous Metals (NFM) BREF* (2018) to be relevant to the assessment of this proposal as it contains BAT conclusions and supporting information for hydrometallurgical and pyrometallurgical processes, which are more representative of the proposed PCB recovery activities than the *Sector Guidance Note for the Inorganic Chemicals sector (EPR 4.3)* or the *Speciality Inorganic Chemicals BREF*.

The NFM BREF provides information on potential air emissions associated with hydrometallurgical operations, including particulate matter, metal compounds and acid gases, together with applicable emission prevention and abatement techniques. However, whilst the document is relevant for understanding the process and available control measures, it does not provide any additional information that materially alters the conclusions of the air quality assessment or the determination of appropriate emission limits for the installation.

Operating techniques for emissions that do not screen out as insignificant

Modelling was carried out using the most appropriate emission limit values (“ELVs”) derived from BAT conclusions documents, the Industrial Emissions Directive and relevant Sector guidance or Guidance Notes (see *Choice of Best Available Techniques reference document (BRef)* above).

It should be noted that for long-term concentrations, the maximum Process Contribution (PC) has been adjusted in accordance with the EA’s guidance on operating modes. It is assumed that the Installation will operate a maximum of 12 hours a day, 5 days a week for 48 weeks per year, i.e. 2,880 hours out of 8,760.

We have audited the modelling and also predict a short term exceedance of 1, 3 butadiene using the assessment assumptions however agree the pilot plant evidence indicated emissions are likely to be substantially lower with no significant human health impact. The PC exceeded the short-term environmental standard (ES) at the most impacted human receptor and the point of maximum ground level concentration. The assessment assumed an emissions concentration of 5mg/m³ however stated bench scale pilot testing indicates actual emissions are much lower, suggesting the modelling assumption is conservative.

The proposed techniques/emission levels for emissions that do not screen out as insignificant are in line with the techniques and benchmark levels contained in the technical guidance and we consider them to represent appropriate techniques for the facility.

We also undertook our own audit modelling and sensitivity analyses and consider the assessment conclusions to be suitable for informing permit determination.

We have included an Improvement Programme which requires verification of all assumptions and modelling predictions through a comprehensive monitoring programme and submission of a revised risk assessment for air emissions. We further require that emission limits be proposed for those substances where there are no emission limits associated with substances likely to be released from recovery processes of this nature.

Operating techniques for emissions that screen out as insignificant

Emissions of Particulate Matter (PM₁₀), VOCs (as benzene) brominated flame retardants (as bromine), arsenic, cadmium, Chromium (III), copper, lead, manganese, mercury, nickel, selenium, vanadium and zinc have been screened out as insignificant, and so we agree that the applicant’s proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

Management of per- and polyfluoroalkyl substances (PFAS) and the use of an Improvement Programme in a new bespoke permit

The Government's PFAS Plan, published in February 2026, recognises that PFAS are persistent substances which may pose risks to human health and the environment and sets out a long-term approach to improve understanding of PFAS sources, pathways and exposures whilst reducing environmental releases. The Plan also confirms that action to manage PFAS risks should not be unnecessarily delayed where scientific uncertainty remains.

The Environment Agency considers that waste printed circuit boards may contain PFAS and that the proposed recovery process provides an opportunity to improve the evidence base for PFAS management within the waste treatment sector. The Improvement Programme included within this permit requires the operator to characterise PFAS, develop a PFAS mass balance, undertake an environmental risk assessment and implement a PFAS Management Plan. These measures will improve understanding of PFAS within the process and ensure that emissions and environmental risks are identified, assessed and managed using the best available information.

The Environment Agency considers that this approach is proportionate, consistent with the principles and direction set out in the Government's PFAS Plan and provides an appropriate mechanism to secure environmental protection whilst supporting the development of innovative resource recovery technologies.

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.

Fire Prevention Plan

We have assessed the fire prevention plan and are not satisfied that it meets the measures and objectives set out in the Fire Prevention Plan (FPP) guidance.

The operator applied to include a broad range of activities including large quantities of non-hazardous waste. However, the information supplied within their FPP did not adequately demonstrate how these would be managed in practice and was not considered representative of operations. As detailed below the permit has been restricted to the waste type and quantity for which sufficient information has been provided and assessed.

As such, we consider the fire risk to be low and have included our standard fire condition within the permit.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable.

We have excluded the following wastes for reasons described below:

- EWC 16 02 14 discarded equipment other than those mentioned in 16 02 09 and 16 02 13.

The operator considered waste PCBs could be designated non-hazardous waste if they had been produced without brominated flame retardants, PFAS chemicals or any hazardous substances.

We asked the operator to provide details of how they would assess incoming waste to ensure it did not contain hazardous substances. They provided an outline of the analytical techniques that screen for the presence of chlorinated and brominated substances (gas chromatography-mass spectrometry and energy dispersive X ray spectroscopy) but not a complete waste classification or robust pre-acceptance procedure.

They stated their early tests using these methods indicate hazardous components have been found and at present the tests are not accurate enough to prove the absence of hazardous substances such as PFAS and that the waste is therefore non-hazardous.

We consider it is reasonable to expect PCBs to contain PFAS and should be coded as hazardous waste EWC 16 02 15*. As such we have restricted the permit to this waste code only. We made these decisions with respect to waste types in accordance with the List of Waste Regulations 2005.

Pre-operational conditions

We have not considered it necessary to include any Pre-Operational conditions.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme (see Table 3.1 below). We have included an improvement programme to ensure that assumptions made with regards to predicted emissions are verified once operations commence.

In addition, PFAS are expected to be present within the printed circuit board feedstock. As this is an emerging technology, improvement conditions have been included requiring the operator to investigate the presence, distribution and fate of PFAS within the process, undertake a PFAS mass balance for inputs and outputs, and assess the risks associated with PFAS across all permitted activities, including potential emissions to air, water and land.

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1 Proposed air emissions monitoring programme	The operator shall submit a written report to the Environment Agency for technical assessment and written approval that proposes a monitoring programme to fully characterise and assess the facility's point source emission(s) to air from activities AR1 and AR2 (solvent-based material recovery activities from shredded WEEE waste). The report shall: a) detail the monitoring methods and frequencies to be used and justify any alternatives to the methods set out in Schedule 3, Table S3.1 for monitoring the listed parameters; b) confirm with supporting evidence that the monitoring will be representative of worst-case conditions (e.g. operating with typical waste streams at maximum plant throughput); c) establish a timetable for undertaking the monitoring. The monitoring programme shall be carried out in line with the timescales approved by the Environment Agency.	1 month from completion of the commissioning programme required under PO1 in Table S1.4
IC2 Emissions inventory to air	Following completion of IC1 the Operator shall submit a report to the Environment Agency for technical assessment and written approval. The report shall: a) present the results of monitoring undertaken from the point source emissions to air from activities AR1 and AR2 to fully characterise and confirm emissions from the treatment processes to inform an emissions inventory; b) include proposals for an ongoing monitoring programme, including frequency of monitoring, which, as a minimum, shall include the parameters listed in Schedule 3, Table S3.1 and any other parameters identified in the emissions inventory required by a) above. Where a parameter identified in the emissions inventory is not included in an ongoing monitoring proposal, you must present conclusive evidence to justify its omission. The ongoing monitoring programme shall be implemented in line with the timescales approved by the Environment Agency.	6 months from completion of IC1

IC3a Updated Environmental Risk Assessment	Following completion of IC2 the operator shall submit a report to the Environment Agency for technical assessment and written approval. The report shall include: - the results and conclusions from an environmental risk assessment to air, land and water, including sensitive receptors (human health and ecological), from the emissions of all relevant parameters identified in the approved emissions inventory using monitoring data gathered under IC2. The assessment must be carried out using the Environment Agency's 'H1 Environmental Risk Assessment' tool (or equivalent as agreed with the Environment Agency) and detailed emissions modelling if required, following our guidance: <u>Risk assessments for your environmental permit - GOV.UK</u> 1. Where there are no published Environment Assessment Levels (EALs), you should derive EALs in accordance with our guidance: <u>Methodology for the scientific derivation of environmental assessment levels - GOV.UK</u> - a proposal of the method(s) to be taken to reduce or abate emissions where detailed assessment shows likely breaches of EALs, critical loads or critical levels at the receptors, including timescales for completion. 2. The Operator shall implement any agreed method(s) identified within the report in accordance with the Environment Agency's written approval and within the approved timescales.	3 months from completion of IC2
IC3b	Following completion of IC3a the operator shall submit a report to the Environment Agency for assessment and written approval. The report shall include: a proposal for emission limit values for any parameters identified in the updated risk assessment to be included in Emissions Table S3.1.	3 months from completion of IC2

IC4 PFAS Characterisation, and Mass Balance	The Operator shall provide a per- and polyfluoroalkyl substances (PFAS) mass balance methodology to the Environment Agency for technical assessment and written approval. The methodology shall include: a) Identification of speciated PFAS to be included in an assessment including justification for their inclusion; b) Identification of all relevant process inputs, intermediate process streams, outputs, products, residues, waste streams and emissions to be assessed; c) Methodology for quantifying and assessing PFAS entering, leaving, being recovered, emitted, transformed, destroyed or potentially accumulating within the process. The methodology should also include a sampling and monitoring programme, sampling locations, monitoring frequencies, analytical methods and limits of detection d) Timescales for implementing the methodology. The Operator shall implement the methodology to timescales agreed with the Environment Agency	3 months from the date of issue of permit EPR/XP3429LR/A001
IC5 PFAS Environmental Risk Assessment	The Operator shall provide a risk assessment to the Environment Agency for technical assessment and written approval, based on the findings of IC4. The risk assessment shall include: a) assessment of the environmental risks to air, land and water associated with PFAS throughout the permitted operations; b) identification of any uncertainties, limitations or data gaps relevant to the assessment; c) proposals for any further monitoring or investigation; d) proposals for control measures necessary to minimise environmental risk including timescales for their implementation. The Operator shall implement the proposals to timescales agreed with the Environment Agency.	6 months from completion of IC4

IC6 PFAS Management Plan	The Operator shall provide a PFAS Management Plan to the Environment Agency for assessment and written approval. The Plan shall include proposals for the frequency at which the emissions inventory and mass balance shall be reviewed and other criteria where changes would trigger a review. These changes shall include but not be limited to: • feedstock composition • process operation • performance of abatement systems • monitoring results that indicate an adverse trend in emissions • regulatory requirements The PFAS Management Plan shall form part of the Environmental Management System and shall be used to demonstrate the ongoing identification, characterisation and control of PFAS emissions, transfers and accumulation within the installation.	1 month from completion of IC5
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Emission Limits

Emission Limit Values (ELVs) based on Best Available Techniques (BAT) have been added for the following substances:

- Total VOCs (as mgC/Nm³)
- Total particulate matter (dust)
- Metals and metalloids excluding mercury (including As, Cd, Co, Cr, Cu, Li, Mn, Ni, Pb, Sb, Se, Ti, V, Zn)
- Dioxin-like polychlorinated biphenyls (PCBs)
- Dioxins and furans (PCDD/F)

These substances have ELVs associated with the BAT conclusions outlined in relevant sector guidance used to determine this permit.

For a series of other pollutants reasonably expected to be present in the shredded waste materials, we have included them in the permit, subject to verification improvement conditions which will enable achievable emission limit values to be set with the agreement of the Environment Agency upon completion. Revised risk assessments and derivation of relevant environmental assessment levels (EALs) are also required for each substance.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

These monitoring requirements have been included in order to aid proposals from the operator as part of the Improvement Programme to set emission limit values that are appropriate for this process.

We made these decisions in accordance with the relevant technical guidance listed in the section above *Choice of Best Available Techniques reference document (BRef)*.

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 and where there are no or limited, standards or accreditations currently available (e.g. monitoring for lithium or PFAS) that the operator is required to justify their choice of monitoring method according to best endeavours and published guidance which are subject to assessment and written approval by the Environment Agency.

Reporting

We have specified reporting in the permit.

We have included as part of the Improvement Programme a series of ICs that relate to the management of PFAS in line with relevant waste sector guidance that sets out a requirement to develop and maintain an emissions inventory for substances known to be present in waste streams. In developing the emissions inventory, the operator is required to characterise the accepted waste stream, propose a monitoring programme and carry out a PFAS mass balance. To ensure a review of PFAS entering the process is not limited to completion of a one-off improvement condition, we have include a reporting requirement where a review of the emissions inventory takes place on a frequency to be defined by the operator, or when criteria may trigger a review (criteria also to be defined by the operator) that reviews the need to repeat a PFAS mass balance to inform a revised risk assessment.

We made these decisions in accordance with the government's published PFAS plan (February 2026).

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.

Technical Competence

Technical competence is required for the waste activities permitted.

The operator is a member of the CIWM scheme

We are satisfied that the operator is technically competent.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

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.

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 UKHSA.

Brief summary of issues raised: No significant concerns regarding risks to health of the local population due to the distance to receptors however they raised the following recommendations for consideration during determination:

- **Air emissions:** Confirm the stack height used in modelling is appropriate, provide more detail on abatement, and verify emissions are not significant once operational. Total VOC emissions are approaching the ELV.
- **Water emissions:** Consider widening the scope of testing to include the sum of 48 PFAS compounds, not just PFOS and PFOA, and confirm emissions are not significant during operation.
- **Odour:** Assess whether further consideration of odorous emissions is required and implement a complaints procedure.
- **Management systems:** Complete the Environmental Management System and Accident Management System.
- **COMAH/Hazardous Substances:** Confirm whether the site requires hazardous substances consent or falls within COMAH scope.

Summary of actions taken: We have audited the operators Air Emissions Risk Assessment and conclude that emissions are insignificant (with the exception of 1,3 butadiene (Operating techniques for emissions that do not screen out as insignificant)).

There are no effluent emissions to water from the installation. Process waters and spent solvent will be removed from site for third part disposal.

We do not consider odour emissions will be a concern beyond the site boundary. Chemicals and waste are stored in sealed containers with air emissions abated by carbon filter.

We consider the operator has appropriate management arrangements in place and can develop and implement an EMS that meets permit requirements. It is not approved at permit issue and will continue to develop during operation of the site.

No further responses were received from any other external consultees.