Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Fine Organics Limited

Fine Organics Seal Sands Facility
Seal Sands Road
Middlesbrough
Cleveland
TS2 1UB

Variation application number

EPR/PP3439GG/V008

Permit number

EPR/PP3439GG

Fine Organics Seal Sands Facility
Permit number EPR/PP3439GG

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.

This variation permits the production, in batch reactions, of flocoumafen (FCM), a second-generation anti-coagulant rodenticide, within existing and modified development laboratories on site. A new release point to air related to this production process, A1/5, is now included in the permit. Emissions to air are abated by condensers, carbon filters and HEPA (high efficiency particulate air) filtration.

The existing permitted processes are unchanged by this variation notice.

Fine Organics Limited (part of the Lianhetech Group) produce on the site speciality organics fine chemicals for the agrochemical, pharmaceutical and speciality chemical sectors on part of a multi-operator installation. A wide range of organic chemical reactions are employed to meet customer toll synthesis requirements, including under a Multi-product Protocol. Steam for the production processes is supplied by three boilers.

The installation has emission points to air and discharges waste water under consent to sewer for treatment at Northumbrian Water's Bran Sands Waste Water Treatment Plant.

The site is located in the Seal Sands industrial area to the north of the river Tees (National Grid Reference NZ5338324367). The closest residential property is over 3km to the south. The Teesmouth and Cleveland Coast Special Protected Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI) are within 1km as well as a National Nature Reserve and Local Wildlife 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 BV5971IG	Received 15/08/2003	Duly made 05/09/2003
Request for additional information	Request dated 06/02/2004	
Response to request for information	By letter dated 26/01/2004	Revision to Table B1.1 of Form IPPC 1 Part B ("The Installation Table")
Additional information (unsolicited)	By letter dated 27/02/2004	Completion of Improvement Condition regarding potential for pollution arising from flooding, proposed as item 2.8.4 in Application
Additional information (unsolicited)	By letter 31/03/2004	Clarification of Schedule 1 Activities carried out within the Installation
Response to request for information	Request dated 28/04/2004	

Status log of the permit		
Description	**Date**	**Comments**
Response to request for information	Request dated 30/04/2004	
Response to request for information	By letter/Email dated 05/05/2004	Confirmation of chemical product description against Scheduled Activities in Table 1.1.1 of the Permit
Response to request for information	Email dated 13/05/2004	Rated thermal inputs of combustion; reference numbers for monitoring methods/procedures; further details of emission points to air
Response to request for information	Email dated 19/05/2004	Revised EP OPRA calculation; revised electronic version of site plan.
Permit BV5971IG	Issued 28/05/2004	
1st Variation GP3738SN	Determined 18/02/2005	Outstanding corrections from original permit issue included
2nd Variation EP3832SS	Issued 01/08/2005	Modification of the permit to refer to the pipeline to the Northumbria Water Ltd facility as a Private Sewer
Application for variation	Received 30/03/2005	Variation of permit to meet the requirements of WID
Request for additional information	Email dated 08/11/2005	Wastes classification and incinerator throughput
Response to request for information	Email/letter 10/11/2005	Wastes classification and incinerator throughput provided
Request for additional information	Email 29/11/2005	Throughput, calorific values and waste compositions
Request for additional information	Email 30/11/2005	Temperature measurement location, waste composition, water vapour measurement
Response to request for information	Email/letter 06/12/2005	Throughput, calorific values and waste compositions provided
Response to request for information	Email/letter 06/12/2005	Temperature measurement location, waste composition, water vapour measurement provided.
3rd Variation XP3930LC (EPR/BV5971IG/V004)	Determined 14/12/2005	
Application received	18/01/2007	
4th Variation AP3236MC (EPR/BV5971IG/V005)	Issued 21/05/07	To remove references to the BDF manufacturing process, include improvement conditions from the 2007 OMA, addresses the footnotes in the original PPC Permit and consolidates the previous variations for ease of reference.
Transfer Application EPR/PP3439GG/T001	Application received 01/09/2008	Application to transfer the permit in full to Fine Organics Limited from Laporte Industries Limited.
Transfer Determined EPR/PP3439GG/T001	Issued 24/10/2008	Full transfer of permit complete.
Application EPR/PP3439GG/T002	Duly made 18/10/2012	Application to transfer the operational control of the Incineration plant

Status log of the permit		
Description	**Date**	**Comments**
(part transfer of permit EPR/PP3439GG)		
Partial Transfer determined EPR/PP3439GG/T002	13/12/2012	Operational control of the Incineration plant to Fine Environmental Services Limited
Environment Agency variation determined EPR/PP3439GG/V003	29/05/2013	To implement the changes introduced by IED
Application EPR/PP3439GG/V004 (variation and consolidation)	Duly made 02/12/2014	Application to vary operating techniques, ELV's, monitoring methods and update the permit to modern conditions.
Variation determined EPR/PP3439GG/V004	02/04/2015	Varied and consolidated permit issued in modern condition format.
Application EPR/PP3439GG/V005	Received 03/12/2015	Application withdrawn by the operator on 18th August 2017.
Application EPR/PP3439GG/V006	Duly made 05/12/2017	Rerouting and removal of emission point A2/1 to new emission point A8/1. Re-commissioning of the ozone generation plant and addition of new associated emission point A3/4. Additional monitoring methods added to enable instrumental and manual monitoring for four parameters.
Variation determined EPR/PP3439GG/V006	17/04/2018	Varied and consolidated permit issued to Fine Organics Limited.
Application EPR/PP3439GG/V007	Duly made 12/12/2022	Additional production plant for 2 products, replacement and additional CHP, additional gas fired boiler, alignment installation boundary to the land ownership boundary, ELV for an existing point source emission to air for HBr.
Response to Schedule 5 notice dated 11/01/2023	Received 17/02/2023	Clarification and confirmation of application information including reviewing assessment of emissions to air.
Response to request for further information dated 17/03/2023	Received 03/04/2023	Further clarification of Volatile Organic Compounds emissions assessment
Submission of additional information	Received 23/06/2023	Further detail on abatement of LC900 process emissions (application section 10.6)
Submission of additional information	Received 11/06/2024	Change of application to remove LC900 and concentrate only on increase to FPM production
Response to Regulation 61 notice dated 12/06/2024	Received 06/08/2024	Information concerning Medium Combustion Plant Directive permit review to be integrated into variation EPR/PP3439GG/V007
Response to Schedule 5 notice dated 09/01/2025. Reissued 14/03/2025 to clarify requested information still outstanding	Received 28/02/2025 and 10/04/2025	Confirmation of final version of application including removal of all CHPs and submission of dispersion modelling for VOCs
Variation determined EPR/PP3439GG/V007	12/02/2026	Varied and consolidated permit issued to Fine Organics Limited
Application EPR/PP3439GG/V008 (variation and consolidation)	Duly made 12/06/2026	Application to add production facility for flocoumafen (FCM).

Status log of the permit		
Description	**Date**	**Comments**
Response to Schedule 5 notice dated 22/09/2026.	06/10/2026	Additional information on abatement; gaseous emissions; recovery/recycle of ethylene dichloride; emergency response and potential other than normal operating conditions (OTNOC).
Additional information	15/10/2026	Site plan showing emission point, A1/5.
Variation determined EPR/PP3439GG/V008	06/11/2026	Varied and consolidated permit issued to Fine Organics Limited.

Other Part A installation permits relating to this installation		
Operator	**Permit number**	**Date of issue**
Fine Environmental Services Limited	EPR/ZP3438CF	13/12/2012
Victrex Manufacturing Limited	EPR/NP3339MT	20/12/2006

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/PP3439GG

Issued to

Fine Organics Limited ("the operator")

whose registered office is

Seal Sands
Middlesbrough
Cleveland
TS2 1UB

company registration number 01532065

to operate part of a regulated facility at

Fine Organics Seal Sands Facility
Seal Sands Road
Middlesbrough
Cleveland
TS2 1UB

to the extent set out in the schedules.

The notice shall take effect from 06/11/2026.

Name	Date
Sandra Cavill	**06/11/2026**

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 as referenced in conditions 2.1.1, 2.3.6 and 3.5.5 is varied to add a new scheduled activity for the production of flocoumafen (AR11), add new Directly Associated Activity (AR20) for the abatement of gaseous releases from FCM production and renumber scheduled activities and directly associated activities.
- Table S1.2 as referenced in conditions 2.3.1 and 2.3.2 is varied to add new operating techniques for the production of flocoumafen.
- Table S1.3 as referenced in condition 2.4.1 is varied to record IP30 as 'complete' and add new improvement conditions, IP31 and IP32.
- Table S3.1 as referenced in conditions 3.1.1, 3.5.1 and 3.5.4 is varied to add new point source emission point, A1/5 with associated emission limit value and monitoring requirements.
- Table S4.1 as referenced in condition 4.2.3 is varied to add reporting for releases from A1/5.
- The site plan included at Schedule 7, as referenced by condition 2.2.1, is varied to include emission point A1/5.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/PP3439GG

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/PP3439GG/V008 authorising,

Fine Organics Limited ("the operator"),

whose registered office is

Seal Sands
Middlesbrough
Cleveland
TS2 1UB

company registration number 01532065

to operate part of an installation at

Fine Organics Seal Sands Facility
Seal Sands Road
Middlesbrough
Cleveland
TS2 1UB

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

Name	Date
Sandra Cavill	**06/11/2026**

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.

1.2 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.

1.5 Multiple operator installations

1.5.1 Where the operator notifies the Environment Agency under condition 4.3.1 (a) or 4.3.1 (c), the operator shall also notify without delay the other operators of the installation of the same information.

1.6 Multi product protocol

1.6.1 Where the operator proposes to make a change under a multi product protocol that is not otherwise the subject of an application for approval under the Regulations or this permit:

(a) the Environment Agency shall be notified of the proposed change;

(b) the notification shall contain a description of the change including: an assessment of its environmental impact; any relevant supporting assessments and drawings; and the proposed implementation date;

(c) the change shall not be implemented unless approved in writing by the Environment Agency;

(d) as from any approved implementation date, the operator shall operate in accordance with the changed multi product protocol in place of the previously approved version.

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”).

2.2 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, which surrounds, but excludes, the areas edged in red or blue on the site plan that represent the extent of the installation covered by the permits of the other operators of the installation.

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 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.

2.3.5 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.

2.3.6 For activity AR19 specified in Schedule 1 Table S1.1:

(a) the operator must keep periods of start-up and shut down of the combustion plant as short as possible.

(b) there shall be no persistent emission of 'dark smoke' as defined in section 3(1) of the Clean Air Act 1993.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

2.5 Pre-operational Conditions

2.5.1 The operations specified in schedule 1 table S1.4 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 and S3.2.

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 and S3.2.

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 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.5.5 For activity AR19 specified in Schedule 1 Table S1.1:

(a) For existing MCP, monitoring measurements shall be carried out within four months of the issue date of this notice.

(b) For new MCP, the first monitoring measurements shall be carried out within four months of the issue date of the permit or of the date when the MCP is first put into operation, whichever is later.

3.5.6 Monitoring of MCP shall not take place during periods of start-up or shut down.

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.

4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual operating hours for each MCP.

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 The operator shall submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive, by 31 January each year in respect of the previous year.

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 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.

4.3.4 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.

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

4.3.6 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:

(a) a decision by the Secretary of State not to re-certify the agreement;

(b) a decision by either the operator or the Secretary of State to terminate the agreement; and

(c) any subsequent decision by the Secretary of State to re-certify such an agreement.

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 "without delay, 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**	**Limits of specified activity**
AR1	Section 4.1 Part A (1) (a) (i) - producing organic chemicals such as hydrocarbons (linear or cyclic, saturated or unsaturated, aliphatic or aromatic)	Producing organic chemicals such as complex aromatic or aliphatic compounds, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR2	Section 4.1 Part A (1) (a) (ii) - producing organic chemicals such as organic compounds containing oxygen, such as alcohols, aldehydes, ketones, carboxylic acids, esters, ethers, peroxides, phenols, epoxy resins	Producing organic chemicals such as substituted benzophenones, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR3	Section 4.1 Part A (1) (a) (iii) - producing organic chemicals such as organic compounds containing sulphur, such as sulphides, mercaptans, sulphonic acids, sulphonates, sulphates and sulphones and sulphur heterocyclics	Producing organic chemicals containing S(ii) by thiolation or thionylation reactions and sulphur in higher oxidation states, for example, by sulphonation reactions, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR4	Section 4.1 Part A (1) (a) (iv) - producing organic chemicals such as organic compounds containing nitrogen, such as amines, amides, nitrous-, nitro- or azo-compounds, nitrates, nitriles, nitrogen heterocyclics, cyanates, isocyanates, di-isocyanates and di-isocyanate prepolymers	Producing organic chemicals such as alkoxyamines, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR5	Section 4.1 Part A(1)(a)(v)- producing organic chemicals such as organic compounds containing phosphorus, such as substituted phosphines and phosphate esters	Producing organic chemicals such as complex phosphate derivatives, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR6	Section 4.1 Part A(1)(a)(vi) - producing organic chemicals such as organic compounds containing halogens, such as halocarbons, halogenated aromatic compounds and acid halides	Producing organic chemicals such as oxalyl chloride, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.

Table S1.1 activities			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity**	**Limits of specified activity**
AR7	Section 4.1 Part A(1 (a)(vii) - producing organic chemicals such as organometallic compounds, such as lead alkyls, Grignard reagents and lithium alkyls	Producing organic chemicals such as substituted aryl magnesium and alkoxy magnesium derivatives, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR8	Section 4.1 Part A(1)(a)(viii) - producing organic chemicals such as plastic materials, such as polymers, synthetic fibres and cellulose-based fibres	Producing organic polymeric material, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR9	Section 4.4 Part A(1)(a) - producing plant health products or biocides	Producing plant health products and biocides, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR10	Section 4.4 Part A (1) (a) - producing plant health products or biocides	Production of FPM	Receipt of raw materials to storage of finished product.
AR11	Section 4.4 Part A (1) (a) - producing plant health products or biocides	Production of flocoumafen (FCM) not within the Multi-Product Protocol.	Receipt and storage of raw materials to production, storage and dispatch of finished product.
AR12	Section 4.5 Part A(1)(a) - producing pharmaceutical products	Producing pharmaceutical active ingredients, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR13	Section 4.7 Part A(1)(a) - any activity for the manufacture of a chemical which involves the use of ammonia or may result in the release of ammonia into the air other than an activity in which ammonia is only used as a refrigerant	Producing sulphonamides, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
	Directly Associated Activity		
AR14	Any manufacturing activity which may result in the release of carbon disulphide into the air	Producing compounds such as herbicide or pharmaceutical intermediates, subject to the requirements of the Multi Product Protocol.	Receipt of raw materials to storage of finished product.
AR15	Storage and handling of raw materials	Storage of solid, liquid and gaseous materials in bulk storage tanks, drums, IBC's, bags and other containers.	Receipt and storage of raw materials to transfer to batch preparation or other process areas.
AR16	Storage, handling and dispatch of intermediates,	Storage of solid and liquid materials in bulk storage	Internal & external storage of intermediates, by-

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Table S1.1 activities			
Activity reference	**Activity listed in Schedule 1 of the EP Regulations**	**Description of specified activity**	**Limits of specified activity**
	by-products, finished products, waste & other materials, including waste treatment and recycling	tanks, drums, IBC's, bags or other containers with segregated storage for waste materials prior to recycling or disposal.	products and finished products; storage of waste in designated areas and loading for transit off site or recycling.
AR17	Control & abatement systems for emissions to air, releases to a sewer and releases to controlled waters	Operation of site abatement systems for the control of releases to air, sewer and controlled waters.	Extraction and collection of waste gases and treatment in condensers, scrubbers and the thermal oxidiser; collection and treatment of process effluent and site surface water, including destruction of aqueous and organic substances.
AR18	Utilities and Services	Operation of site systems for the supply of utilities and services such as cooling water, nitrogen, compressed air, refrigeration systems, electricity and effluent treatment.	Site utility and services systems as far as the Installation boundary; site combustion units all individually < 20 MWth input.
AR19	Steam/Heat supply from operation of Schedule 25A Medium Combustion Plant	FB1 8.3 MWth gas and gas oil fired boiler MCP FB2 6.0 MWth gas fired boiler MCP FB3 6.7 MWth gas fired boiler MCP	From receipt of fuel to release of products of combustion to air. Annual operating hours for each >500 hours.
AR20	Abatement for gaseous releases from FCM production.	Operation of condensers, carbon bed and HEPA filters to abate gaseous releases from FCM production.	From receipt of gaseous discharges from FCM production to their abatement and discharge of abated releases to atmosphere through release point, A1/5.

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
Application	The response to questions 2.1 and 2.2 given in the application documents as follows: Sections 2.1 and 2.2 of Volume 1 on pages 6-53; Volume 3 (except Section "Impact Assessment using H1 Software in Appendix 3E, which is excluded); The Multi Product Protocol [MPP] in Appendix 9 of Volume 5, as amended.	15/08/2003
Application EPR/PP3439GG/V004	Responses to Parts C2 & C3 section 3 of the application form and referenced supporting documentation.	02/12/2014

Table S1.2 Operating techniques		
Description	**Parts**	**Date Received**
	Additional information received, revised non-technical summary and clarification on emission points to air. (Email dated 02/12/2014)	
Additional information requested 26/01/2015	Response to Schedule 5 request for information, a revised site plan showing the extent of the installation, excluding any other operations taking place within the boundary.	29/01/2015
Additional information requested 02/03/2015	Response to Schedule 5 request for information, details of a new emission point to air A9/1, associated risk assessment and revised site plan showing location of emission point.	19/03/2015
Application EPR/PP3439GG/V006	Parts C2 & C3 of the application documents and all referenced supporting information.	05/12/2017
Application EPR/PP3439GG/V007	Permit Variation Application for Fine Organics Limited (amended) Sections 3-5, 7, 9-11	11/06/2024
Application EPR/PP3439GG/V007	BAT assessment against BRef for Organic Fine Chemicals	28/02/2025
Final response to Schedule 5 notice dated 09/01/2025	Response to Questions 4 (emission points for VOCs); 5 (Combustion emissions); 7 (bunding details); 8 (BAT assessment)	10/04/2025
Application EPR/PP3439GG/V008	Operating Techniques described in document, “Permit Variation Application for Fine Organics Limited, PP3439GG_FOL_Variation Application V008”: - Section3, Non-Technical Summary. - Section 8, Environmental Risk Assessment. - Section 9, BAT Assessment. - Section 10, Technical Description of Proposed Changes to Permit Conditions and Controls. - Section 11, Accident and Fire Prevention and Management Plans. Operating Techniques described in document, “Environmental Permit Variation – BAT Conclusion Compliance Assessment”, reference 422.065617.00001 revision2.0, dated 13/04/2026.	Duly made 12/06/2026
Additional information submitted in response to Schedule 5 Notice dated 22/09/2026.	Operating techniques described in the responses to the Notice (including accompanying information): - Response to Q1 on operation of abatement. - Response to Q2 on operation of fume cupboards, airlocks and isolators to minimise potential for environmental releases. - Response to Q3(a) and Q3(c) on ensuring carbon beds and HEPA filters operate efficiently to abate gaseous releases. - Response to Q4 on operation of temperature alarms and trips. - Response to Q5 on handling, storage and disposal of equipment that may have come into contact with hazardous materials such as flocoumafen. - Response to Q6 on recovery/recycling of ethylene dichloride. - Response to Q9 on management of OTNOC (Other Than Normal Operating Conditions) relating to flocoumafen production.	06/10/2026

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IP24	**Controlling releases to the sewer** The Operator shall provide a written report to the Environment Agency on releases to sewer from release point D1, with particular reference to List I and List II substances and Substances of Potential Environmental Significance. The report shall identify substances released together with concentration, mass release and operational data sufficient to identify operational criteria which will further control and reduce overall releases, as appropriate, by the application of techniques such as those stated in section 2.2.2 of the Guidance for Speciality Organic Chemicals IPPC S4.02. The Operator shall also supply the Environment Agency with copies of the New Effluent Appraisal Protocol and the current Effluent Transfer Specification which defines the limits for substances to be transferred to the NWL effluent treatment plant.	Completed
IP25	**From the 2007 OMA:** Conduct a study to validate the method of weekly sampling of a weekly composite. Submit a summary of this validation work, with a timetable to implement any recommendations.	Completed
IP26	**From the 2007 OMA:** Conduct sampling and analysis concurrently with the Environment Agency's check monitoring exercise due in 2007. Review and contrast both sets of results to validate the sampling and analytical methods. Then consider whether any changes are required to the sample point locations when compared against the requirements of M1 guidance. Submit a summary of the findings to the Environment Agency including a timetable to implement any recommendations.	Completed
IP27	**From the 2007 OMA:** Conduct a BAT assessment of the calibration of rotameters used in the calculation of mass release rates. Submit a summary of the findings to the Environment Agency including a timetable to implement any recommendations.	Completed
IP28	**Methylene dichloride releases** The operator shall provide a written report to the Environment Agency on releases of methylene dichloride from release points A1/1, A1/2, A1/3 and A1/4. The report shall identify concentration data, mass release and operational data sufficient to identify operational criteria which will further control and reduce overall releases, as appropriate, by the application of techniques such as those stated in section 2.2.1 of the Guidance for Speciality Organic Chemicals IPPC S4.02.	Completed
IP29	The operator shall submit a written report to the Environment agency for approval. The report shall contain a full cost benefit analysis identifying the options that can be introduced at the installation to bring about further reductions to emission levels of Volatile Organic Compounds (VOCs) in line with Best Available Techniques.	Completed
IP30	**Confirmation of acceptable impact on ecological receptors** Once the variation changes are commissioned, the operator shall submit a written report to the Environment Agency for assessment and written approval. The report must contain: a) Monitoring results for emissions of oxides of nitrogen to air from combustion sources and from process sources.	Completed

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
	b) A modelling assessment of oxides of nitrogen concentrations, nutrient nitrogen deposition and acid deposition at the nearest points of Teesmouth and Cleveland Coast SSSI/SPA/Ramsar site. c) Alternative measures to reduce emissions if the report cannot confirm acceptable impacts. The operator must implement any proposals identified within the report in accordance with the Environment Agency's written approval and within the approved timescales.	
IP31	**Confirmation of insignificant particulate release from A1/5** The operator shall submit a report to the Environment Agency for technical assessment and written approval that includes the results of MCERTS monitoring of the release from A1/5 for particulate matter (total PM and PM_{10}). The report shall include the results of at least three rounds of sampling and testing carried out on different days. The report shall confirm that there are insignificant levels of particulate matter released from A1/5 or, should that not be the case, propose additional particulate abatement with timescales and/or additional routine or focused monitoring and/or demonstrate that emissions of particulates do not cause an unacceptable adverse impact on human health receptors. The operator shall implement any proposals identified within the report in accordance with the Environment Agency's written approval and within the approved timescales.	31/03/2027
IP32	**Scoping scheduled soil and groundwater monitoring** The operator shall submit a report to the Environment Agency for approval that contains the scope of the routine five-yearly monitoring of groundwater and ten-yearly monitoring of soil to be carried out in 2028. The scoping document must incorporate the findings of the updated Stage 1-3 Assessment submitted for permitting of the FCM production project, the relevant hazardous substances identified in FCM production in that document and any incidents of loss of containment of these substances occurring since operation of the FCM production process. The operator shall commence the 2028 groundwater and soil monitoring only after agreement on the scope has been received in writing from the Environment Agency.	01/01/2028

Table S1.4 Pre-operational measures for future development		
Reference	**Operation**	**Pre-operational measures**
PO 1	Operational activities suitable for authorisation as a minor operational change involving chemicals handling on the area of the installation expanded under variation EPR/PP3439GG/V007	At least 4 weeks before any chemical activities start, the operator shall submit a report for approval, including quantitative monitoring data if appropriate, describing the soil and groundwater condition of the area to be used and details of the operational activities and substances proposed. Where the proposed activities cannot be authorised as a minor operational change a permit variation application shall be submitted.

Table S1.4 Pre-operational measures for future development		
Reference	**Operation**	**Pre-operational measures**
		No operational activities shall commence without written approval from the Environment Agency of a minor operational change or granting of a permit variation, whichever the Environment Agency deems to be appropriate.

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	**Specification**
Gas Oil or an equivalent substitute to be agreed in writing with the Environment Agency	Sulphur Content 0.1% w/w max

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 (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
A1/1 on plan in Schedule 7	Multi Product Building (MPB)-1, Main Discharge Stack via abatement	Ammonia	10.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** non-isokinetic and isokinetic sampling into dilute H_2SO_4 analysis by IC (BS EN 14791)
		Dichloro-methane	10kg/hr (weekly average as required)	Average over sampling period	Monthly Note 3	Extractive sampling onto sorbent, solvent extraction and analysis by GC with appropriate detector (BS EN 13649)
		Hydrogen Chloride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic / non-isokinetic sampling and impingement analysis by titration, spectrometry or IC (BS EN 1911)
		Hydrogen Fluoride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic or non-isokinetic sampling and impingement analysis by ion selective electrode or ion chromatography (BS EN 15713)
		Hydrogen Bromide	Note 1	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) or non-isokinetic **or** isokinetic sampling and impingement

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
						analysis by ion chromatography (US EPA Method 26 (non-isokinetic) and 26A (isokinetic).
		Oxides of Nitrogen (expressed as NO_2)	200 mg/m^3	Average over sampling period	Note 2	Note 2
		Total Class A and B Volatile Organic Compounds (expressed as carbon)	MPB1-10kg/hour	Average over sampling period	Quarterly for 48 hours	Extractive sampling and FID analyser (BS EN 12619)
		Oxides of Sulphur (expressed as SO_2)	10.0 mg/m^3	Average over sampling period	Note 2	Note 2
		Ozone	No limit set	--	--	--
		Chlorine	No limit set	--	--	--
A1/2 on plan in Schedule 7	MPB-2 Main Discharge Stack via abatement	Ammonia	10.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** non-isokinetic and isokinetic sampling into dilute H_2SO_4 analysis by IC (BS EN 14791)
		Dichloro-methane	10kg/hr (weekly average as required)	Average over sampling period	Monthly Note 3	Extractive sampling onto sorbent, solvent extraction and analysis by GC with appropriate detector (BS EN 13649)
		Hydrogen Chloride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic / non-isokinetic sampling and impingement analysis by titration, spectrometry or IC (BS EN 1911)

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Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
		Hydrogen Fluoride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic or non-isokinetic sampling and impingement analysis by ion selective electrode or ion chromatography (BS EN 15713)
		Hydrogen Bromide	Note 1	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) or non-isokinetic **or** isokinetic sampling and impingement analysis by ion chromatography (US EPA Method 26 (non-isokinetic) and 26A (isokinetic).
		Oxides of Nitrogen (expressed as NO_2)	200 mg/m^3	Average over sampling period	Note 2	Note 2
		Total Class A and B Volatile Organic Compounds (expressed as carbon)	MPB2-20kg/hour	Average over sampling period	Quarterly for 48 hours	Extractive sampling and FID analyser (BS EN 126 19)
		Oxides of Sulphur (expressed as SO_2)	10.0 mg/m^3	Average over sampling period	Note 2	Note 2
		Ozone	No limit set	--	--	--
		Chlorine	No limit set	--	--	--
A1/3 on plan in Schedule 7	MPB-3 Main Discharge Stack via abatement	Ammonia	10.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** non-isokinetic and isokinetic sampling into dilute H_2SO_4

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
						analysis by IC (BS EN 14791)
		Dichloro-methane	10kg/hr (weekly average as required)	Average over sampling period	Monthly Note 3	Extractive sampling onto sorbent, solvent extraction and analysis by GC with appropriate detector (BS EN 13649)
		Hydrogen Chloride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic / non-isokinetic sampling and impingement analysis by titration, spectrometry or IC (BS EN 1911)
		Hydrogen Fluoride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic or non-isokinetic sampling and impingement analysis by ion selective electrode or ion chromatography (BS EN 15713)
		Hydrogen Bromide	Note 1	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) or non-isokinetic **or** isokinetic sampling and impingement analysis by ion chromatography (US EPA Method 26 (non-isokinetic) and 26A (isokinetic).
		Oxides of Nitrogen (expressed as NO_2)	200 mg/m^3	Average over sampling period	Note 2	Note 2

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
		Total Class A and B Volatile Organic Compounds (expressed as carbon)	MPB3-10kg/hour	Average over sampling period	Quarterly for 48 hours	Extractive sampling and FID analyser (BS EN 126 19)
		Oxides of Sulphur (expressed as SO_2)	10.0 mg/m^3	Average over sampling period	Note 2	Note 2
		Ozone	No limit set	--	--	--
		Chlorine	No limit set	--	--	--
A1/4 on plan in Schedule 7	MPB-4 Main Discharge Stack via abatement	Ammonia	10.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** non-isokinetic and isokinetic sampling into dilute H_2SO_4 analysis by IC (BS EN 14791)
		Dichloro-methane	10kg/hr (weekly average as required)	Average over sampling period	Monthly Note 3	Extractive sampling onto sorbent, solvent extraction and analysis by GC with appropriate detector (BS EN 13649)
		Hydrogen Chloride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic / non-isokinetic sampling and impingement analysis by titration, spectrometry or IC (BS EN 1911)
		Hydrogen Fluoride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic or non-isokinetic sampling and impingement analysis by ion selective

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Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
						electrode or ion chromatography (BS EN 15713)
		Hydrogen Bromide	Note 1	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) or non-isokinetic **or** isokinetic sampling and impingement analysis by ion chromatography (US EPA Method 26 (non-isokinetic) and 26A (isokinetic).
		Oxides of Nitrogen (expressed as NO_2)	200 mg/m^3	Average over sampling period	Note 2	Note 2
		Total Class A and B Volatile Organic Compounds (expressed as carbon)	MPB4-5kg/hour	Average over sampling period	Quarterly for 48 hours	Extractive sampling and FID analyser (BS EN 126 19)
		Oxides of Sulphur (expressed as SO_2)	10.0 mg/m^3	Average over sampling period	Note 2	Note 2
		Ozone	No limit set	--	--	--
		Chlorine	No limit set	--	--	--
A1/5 on plan in Schedule 7	FCM Production Discharge Stack via abatement	Ethylene dichloride Note 6	1mg/m^3	Average over sampling period	Quarterly for first six months of operation then every six months.	CEN TS 17638 or CEN TS 13649
		Methanol (as TVOC) Note 6	No limit set	Average over sampling period	Quarterly for first six months of operation then every six months.	EN ISO 12619 or EN ISO 13199
		Total particulate matter	Note 7	Note 7	Note 7	EN 13284-1 and the MID for EN 13284-1

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
		Particulate matter (PM_{10})	Note 7	Note 7	Note 7	EN ISO 23210
A2/2 on plan in Schedule 7	No current emissions.	--	--	--	--	--
A3/4 on plan in Schedule 7	Ozonolysis Scrubber Vent	Ozone	No limit set	--	--	--
A4/1 on plan in Schedule 7	Boiler FB1	Oxides of Nitrogen (NO and NO_2 expressed as NO_2)	200 mg/Nm^3	Periodically	Every 3 years Note 5	BS EN 14792 Note 4
		Carbon Monoxide	No limit set	Periodically	Every 3 years Note 5	BS EN 15058
A4/2 on plan in Schedule 7	Boiler FB2	Oxides of Nitrogen (NO and NO_2 expressed as NO_2)	200 mg/Nm^3	Periodically	Every 3 years Note 5	BS EN 14792
		Carbon Monoxide	No limit set	Periodically	Every 3 years Note 5	BS EN 15058
A4/3 on plan in Schedule 7	Boiler FB3	Oxides of Nitrogen (NO and NO_2 expressed as NO_2)	100 mg/Nm^3	Periodically	Every 3 years Note 5	BS EN 14792
		Carbon Monoxide	No limit set	Periodically	Every 3 years Note 5	BS EN 15058
A5/1 on plan in Schedule 7	MPB-2 V228 Hydrogenator Vent	No parameters set	No limit set	--	--	--
A8/1 on plan in Schedule 7	North side MPB-1 Process Scrubber stack	Ammonia	10.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** non-isokinetic and isokinetic sampling into dilute H_2SO_4

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
						analysis by IC (BS EN 14791)
		Dichloro-methane	10 kg/hr (weekly average as required)	Average over sampling period	Monthly Note 3	Extractive sampling onto sorbent, solvent extraction and analysis by GC with appropriate detector (BS EN 13649)
		Hydrogen Chloride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic / non-isokinetic sampling and impingement analysis by titration, spectrometry or IC (BS EN 1911)
		Hydrogen Fluoride	5.0 mg/m^3	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) **or** isokinetic or non-isokinetic sampling and impingement analysis by ion selective electrode or ion chromatography (BS EN 15713)
		Hydrogen Bromide	Note 1	Average over sampling period	Annual Note 3	Extractive sampling and FTIR analyser (TGN M22) or non-isokinetic **or** isokinetic sampling and impingement analysis by ion chromatography (US EPA Method 26 (non-isokinetic) and 26A (isokinetic).
		Oxides of Nitrogen (expressed as NO_2)	200 mg/m^3	Average over sampling period	Note 2	Note 2

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	**Source**	**Parameter**	**Limit (including unit)**	**Reference period**	**Monitoring frequency**	**Monitoring standard or method**
		Total Class A and B Volatile Organic Compounds (expressed as carbon)	MPB1-10kg/hour	Average over sampling period	Quarterly for 48 hours	Extractive sampling and FID analyser (BS EN 126 19)
		Oxides of Sulphur (expressed as SO_2)	10.0 mg/m^3	Average over sampling period	Note 2	Note 2
		Ozone	No limit set	--	--	--
		Chlorine	No limit set	--	--	--
		MIBK	No limit set	--	--	--
		n-Butanol	No limit set	--	--	--
A9/1 on plan in Schedule 7	MPB-1 V101 Hydrogenator Vent	No parameters set	No limit set	--	--	--

Note 1: The Operator shall submit a BAT/H1 impact assessment and a review of the monitoring location, prior to any release of hydrogen bromide. This Permit shall then be varied prior to any release of hydrogen bromide, to include a monitoring method, emission limit value and schedule. The reference measurements used shall be agreed in writing by the Environment Agency.

Note 2: Monitoring method and frequency as agreed in writing with the Environment Agency.

Note 3: Monitoring of emission with the stated frequency is required if and when there is potential to release the stated substance, unless otherwise agreed in writing with the Environment Agency.

Note 4: Operators should monitor on a mix of fuels representative of normal operation. Operators should record the % fuel mix used at the time of monitoring

Note 5: Monitoring every 3 years means from date of acceptance of first monitoring measurements under condition 3.5.5.

Note 6: To the extent possible, the measurements are carried out at the highest expected emission state under normal operating conditions.

Note 7: Limit, reference period and monitoring frequency to be set, if required, following completion of IP31.

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**
D1 on plan in schedule 7	Aqueous effluent balancing tanks	No parameters set	No limit set Note 1	--	--	--
Note 1: Limits set by trade effluent consent to discharge.						

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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**
Emissions to air Parameters as required by condition 3.5.1	A1/1, A1/2, A1/3, A1/4, A1/5, A8/1	Every 3 months	1 January, 1 April, 1 July, 1 October
Emissions to air (MCP) Parameters as required by condition 3.5.1	A4/1, A4/2, A4/3	Every 3 years from date of acceptance of first monitoring measurements under condition 3.5.5	1 January

Table S4.2: Annual production/treatment	
Parameter	**Units**
Total Site Production	tonnes

Table S4.3 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
Air quality impact • Methylene dichloride (Dichloromethane) release per tonne product • Volatile Organic Compound release per tonne product	Annually	tonnes/tonne
Releases to sewer • Total Chemical Oxygen Demand release per tonne product • Total Metals release per tonne product • Total List I Substances release per tonne product • Total List II Substances release per tonne product	Annually	Tonnes/tonne
Potable water use	Annually	m^3/tonne
Non potable water use	Annually	m^3/tonne
Waste Hazard Score	Annually	(no units)
Energy use: • per tonne product • delivered electricity	 Annually Annually	 MWh/tonne MWh

Table S4.3 Performance parameters		
Parameter	**Frequency of assessment**	**Units**
• primary electricity (delivered x 2.6)	Annually	MWh
• primary carbon dioxide (primary electricity x 0.166)	Annually	tonnes
• primary carbon dioxide per tonne product	Annually	tonnes/tonne
• delivered gas	Annually	MWh
• delivered gas oil	Annually	MWh
• delivered kerosene	Annually	MWh
Waste disposals: • Inert • Hazardous • Non hazardous	Annually	Tonnes

Table S4.4 Reporting forms		
Media/parameter	**Reporting format**	**Date of form**
Air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	01/09/2025
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	01/09/2025
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	01/09/2025
Other performance indicators	Other Performance Parameters Reporting Form or other form as agreed in writing by the Environment Agency	01/09/2025

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	
Substance(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	
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	
Substance(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.

“compliance date” means 01/01/2025 for existing MCPs with net rated thermal input of greater than 5MWth or 01/01/2030 for existing MCPs with a net rated thermal input of less than or equal to 5MWth.

“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 limit.

“existing medium combustion plant” means an MCP in operation before 20 December 2018.

“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.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

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

“Medium Combustion Plant” or ”MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Multi-Product Protocol” (MPP) - means a procedure written by an operator and approved by the Environment Agency, which is referenced in the operational techniques table of this permit. It describes the operator’s management process which can be used to request changes, within the limits in that document only, to the original permit without the need for a formal permit variation application.

“operating hours” means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods.

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

“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.

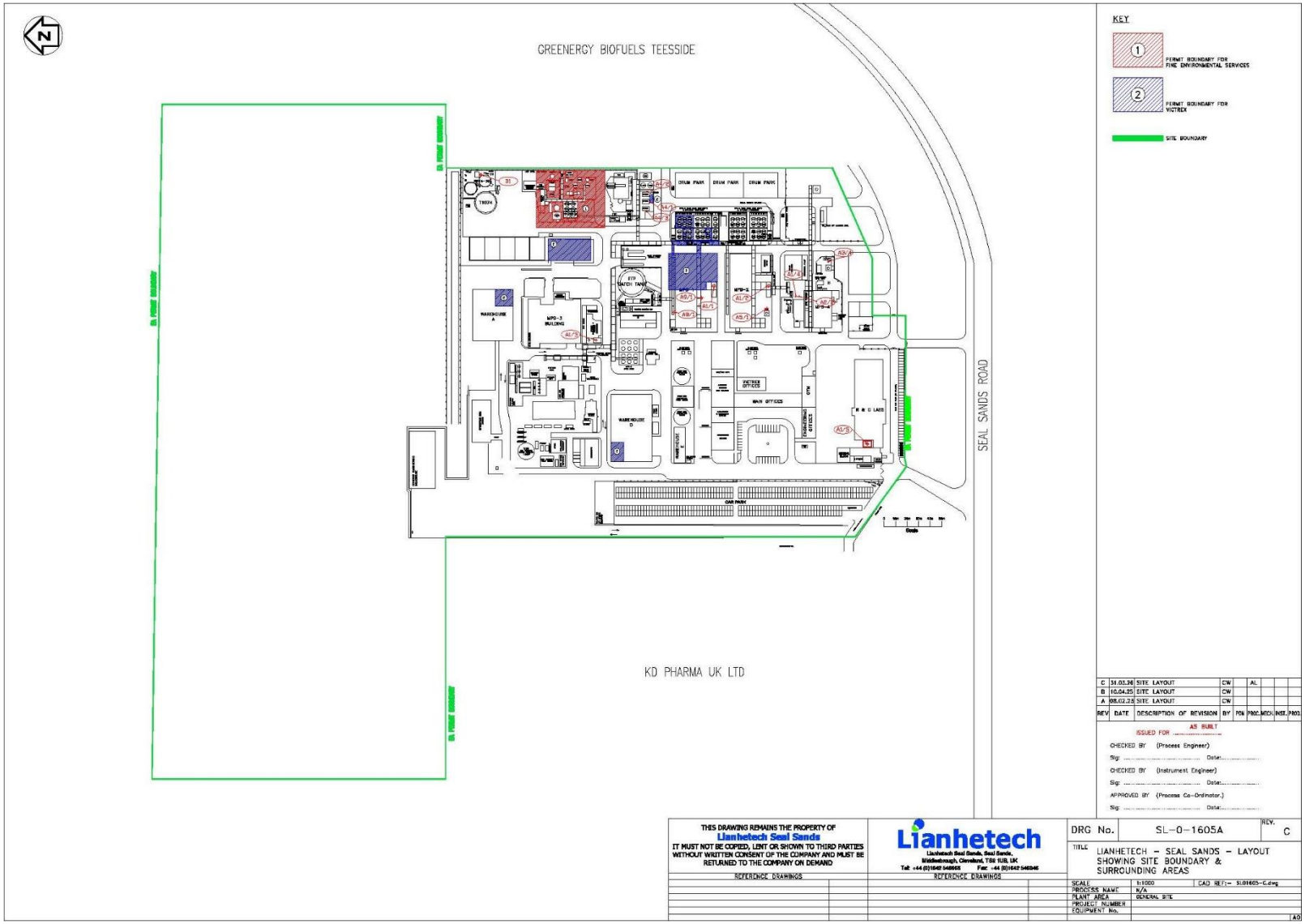
“year” means calendar year ending 31 December.

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.

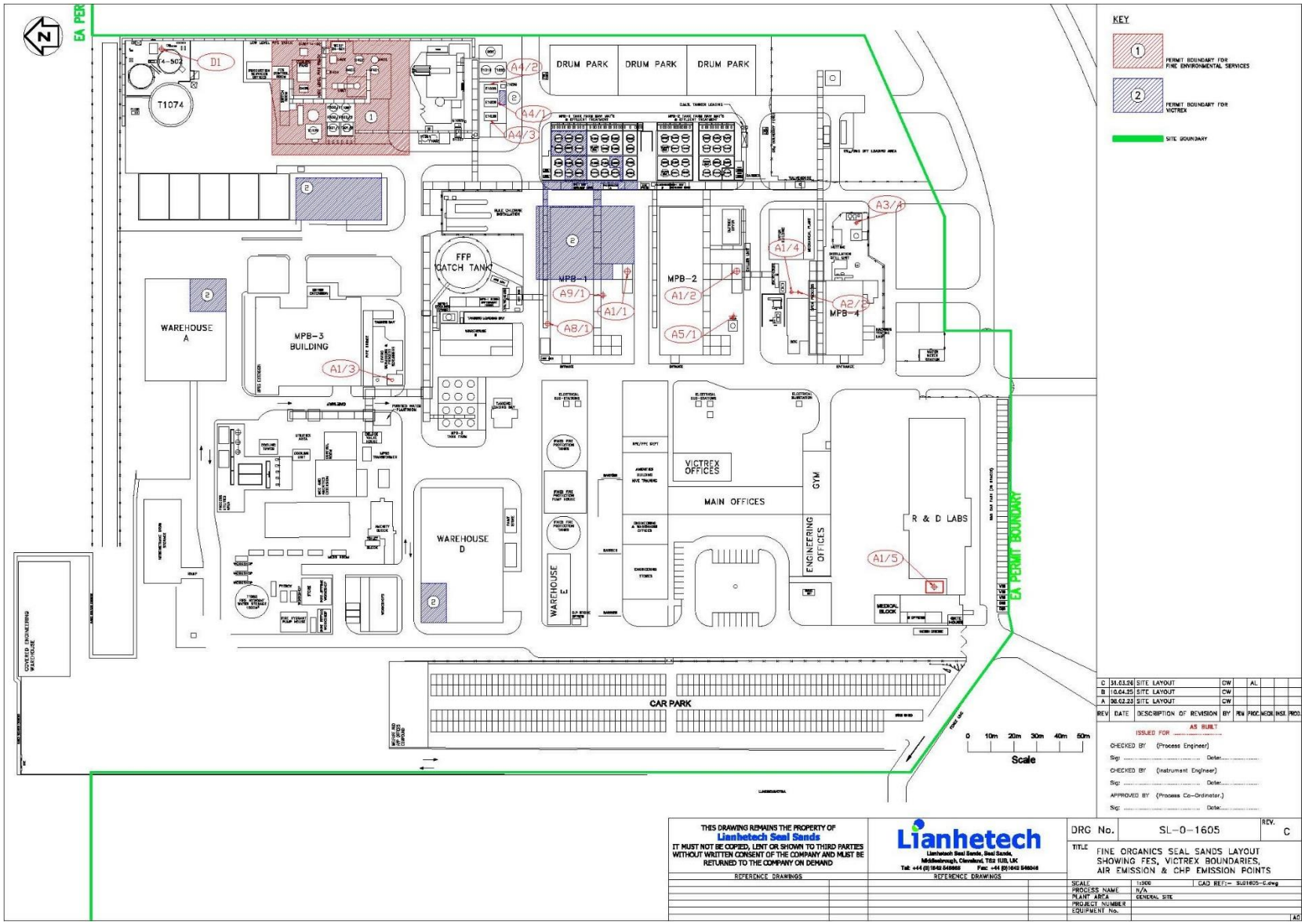
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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 other than gas engines or gas turbines, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous 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.

Schedule 7 – Site plan



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END OF PERMIT

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Emissions to Air Reporting Form

Permit number: **EPR/PP3439GG** **Operator: Fine Organics Limited**

Facility name: **Fine Organics Seal Sands Facility** **Emissions to Air Reporting Form: 01/09/2025**

Reporting of emissions to air for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Emission point	Substance / parameter	Emission Limit Value	Reference period	Test method [1]	Result [2]	Sample dates and times [3]	Measurement uncertainty [4]
[e.g. A1]	*[e.g. Oxides of nitrogen (NO and NO_2 expressed as NO_2)]*	*[e.g. 200 mg/m^3]*	*[e.g. daily average]*	*[e.g. BS EN 14181]*	*[State result]*	*[State relevant dates and time periods]*	*[State % uncertainty at 95% confidence interval]*

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your monitoring results.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

[1] Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
[2] Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
[3] For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
[4] Give the uncertainty associated with the quoted result at the 95% confidence interval. State any confidence intervals that are not 95%.

Water Usage Reporting Form

Permit number: **EPR/PP3439GG** **Operator: Fine Organics Limited**

Facility name: **Fine Organics Seal Sands Facility** **Water Usage Reporting Form: 01/09/2025**

Reporting of water usage for the year *[YYYY]*

Water source	Water usage (m^3)	Specific water usage (m^3/unit)
Mains water	*[insert annual usage in m^3 where mains water is used]*	*[insert annual usage in m^3/unit where mains water is used]*
Site borehole	*[insert annual usage in m^3 where water is used from a site borehole]*	*[insert annual usage in m^3/unit where water is used from a site borehole]*
River abstraction	*[insert annual usage in m^3 where abstracted river water is used]*	*[insert annual usage in m^3/unit where abstracted river water is used]*
Other – *[specify other water source where applicablel. Add extra rows where needed]*	*[insert annual usage in m^3 where applicable]*	*[insert annual usage in m^3/unit where applicable]*
Total water usage	*[insert total annual water usage in m^3]*	*[insert total annual water usage in m^3/unit]*

Operator's comments

Operator's comments

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual water usage.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

Energy Usage Reporting Form

Permit number: **EPR/PP3439GG** **Operator: Fine Organics Limited**

Facility name: **Fine Organics Seal Sands Facility** **Energy Usage Reporting Form: 01/09/2025**

Reporting of energy usage for the year *[YYYY]*

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) [2]
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	*[insert annual consumption in MWh where electricity is imported]*	*[insert annual consumption in MWh/unit where electricity is imported]*
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	*[insert annual consumption in MWh where electricity is imported]*	*[insert annual consumption in MWh/unit where electricity is imported]*
Natural gas	*[insert annual consumption in MWh where natural gas is used]*	*[insert annual consumption in MWh/unit where natural gas is used]*
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	*[insert annual consumption in MWh where gas oil is used]*	*[insert annual consumption in MWh/unit where gas oil is used]*
Imported heat	*[insert annual consumption in MWh where heat is imported]*	*[insert annual consumption in MWh/unit where heat is imported]*
Other – *[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]*	*[insert annual consumption in MWh where applicable]*	*[insert annual consumption in MWh/unit where applicable]*
Electricity exported	*[insert annual production in MWh where electricity is exported]*	Not applicable
Heat exported	*[insert annual production in MWh where heat is exported]*	Not applicable

Operator's comments

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report your annual energy usage.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

[1] Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.
[2] Divide energy consumption by an appropriate unit of raw material processed or product output.

Other Performance Parameters Reporting Form

Permit number: **EPR/PP3439GG** **Operator: Fine Organics Limited**

Facility name: **Fine Organics Seal Sands Facility** **Other Performance Parameter Reporting Form: 01/09/2025**

Reporting of other performance parameters for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Parameter	Units
[e.g. Total raw material usage]	*[e.g. tonnes per production unit]*

Operator's comments

Signed: *[Name]* **Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

Guidance for use: Use this form to report the performance parameters (other than water and energy) required by your permit.
Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. The parameters to report and units to be used can be found in the 'Performance parameters' table in schedule 4 of your permit. Add additional rows as necessary.