

## Hugill, Connor

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**From:** Wray, Kate  
**Sent:** 15 June 2021 15:30  
**To:** Greg Altria  
**Cc:** Jackson, Catriona  
**Subject:** Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Greg,

I have reviewed the application and supporting information for the above site and require the following points addressing before I can duly make the application:

1. Air quality assessment
  - a) The air quality assessment only considers human receptors. Please submit a revised assessment which includes the predicted impacts at nearby ecological receptors as there are a number of Local Wildlife Sites and an Ancient Woodland within the relevant screening distances.
  - b) Provide NGRs for the emission points.
  - c) PM2.5 has been assessed against a limit of 25 µg/m<sup>3</sup>. The limit for PM2.5 is 20 µg/m<sup>3</sup> as per our guidance. Please amend the assessment to reflect this.
2. Please submit a Dust Emission Management Plan in line with the [guidance on dust management plans](#) on the Gov.uk website. With reference to Table 1.19 of the [Environment Agency charging scheme](#) a fixed charge of £1,241 is payable for this plan and assessment. Please note that the additional fee must be paid in full before we can class the application as 'duly made'.
3. The Odour Management Plan does not meet the requirements as set out in our [H4 odour guidance](#) and BAT 15 of the [BAT Conclusions](#). Please submit a revised Odour Management Plan in line with the guidance.
4. Confirm which sewage treatment works the lorry wash effluent will discharge to.
5. Please confirm when the boiler first came into operation.
6. In accordance with Section 2.1.1 of the [BAT Conclusions](#) please confirm what your current specific energy consumption is and demonstrate that you can meet the relevant specific energy consumption level outlined in Table 2 of that section.
7. Grinding - please include emissions from the grinder in section 6.1 of the 'Best Available Techniques Assessment' document and confirm whether you can comply with the BAT-AEL for new plant provided in Bat 17, Table 4 of the [BAT Conclusions](#).

I understand that you have arranged to meet the area officer, Catriona Jackson, at the site on 30/06/21. This will provide the opportunity to discuss any outstanding queries you have before submitting your response. Please be aware that I may need to request additional information, following the site visit if further issues are identified, before the application can be duly made.

Please provide the information detailed above by **02/07/21**. If we do not receive the information by this date we will return your application.

If we do receive the requested information we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:  
<https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

Please let me know if you have any queries in the meantime.

Kind regards

Kate

**Kate Wray**

Permitting Officer – Installations, National Permitting Service

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