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ENDLESS ENERGY LIMITED

ENDLESS ENERGY FACILITY

HABITATS RISK ASSESSMENT

SEPTEMBER 2018

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Drawings

SH11087-030 Site Location

1 INTRODUCTION

- 1.1.1 Endless Energy Limited will operate a Endless Energy Facility at Keighley. The site location is shown on drawing SH11087-030. The land is designated as a brownfield site and covers an overall area of 3.5 hectares. The site is bounded by industrial developments to the west, the A650 dual carriageway to the north and east, and a railway line to the south. The River Aire runs 185 north of the site.
- 1.1.2 The facility is expected to process 148,800 tonnes of waste per year. Waste at the site will be thermally treated, with heat recovered from flue gases by means of an integral water tube boiler, which will in turn create steam to drive a turbine to generate power.
- 1.1.3 The waste types accepted at the site are non-hazardous consisting of residual, commercial and industrial wastes of a similar nature to municipal solid waste.
- 1.1.4 The site will have comprehensive pollution control systems in place. All waste treatment operations will take place within a building, on an impermeable surface with a sealed drainage system. All process water is recirculated and reused on site. Roof water and water from clean areas of the site is discharged to the surface water drain.
- 1.1.5 There are a number of protected sites within 10km of the facility. These comprise a number of SSSIs, Local Nature Reserves, a Biodiversity Action Plan (BAP) site, a Special Area of Conservation (SAC), a Special Protection Area (SPA) and an Area of Outstanding Natural Beauty, as well as other receptors such as small areas of Ancient Woodland. It is important that controls are in place to ensure that operational activities conducted at the Energy from Waste facility do not impact or cause any damage to any of these protected sites.
- 1.1.6 This report describes the protected habitats and considers the potential impact that the installation may cause due to noise, dust, litter, toxic contamination, nutrient enrichment or acid deposition. It will show that measures are in place to control all of these potential impacts and that the site will not cause any detriment to local wildlife sites.

1.1.7 Air quality modelling has been completed which shows that there is no significant impact on sensitive ecological receptors.

2 PROTECTED SITES

2.1.1 The protected sites that lie within 10km of the installation are described in this section.

Special Areas of Conservation (SAC)

2.1.2 There is one recorded SAC within 10km of the Keighley facility:

- South Pennine Moors (2.5km north).

2.1.3 The South Pennine Moors have been designated as a SAC as they form an important area of European dry heath, blanket bogs and old sessile oak woods. These habitats are likely to include bryophyte communities amongst the higher plants and may therefore be particularly susceptible to damage by air pollution.

Special Protected Areas (SPA)

2.1.4 There is one recorded SPA within 10km of the Keighley facility:

- South Pennine Moors Phase 2 (2.5km north).

2.1.5 The SPA has been designated as the South Pennine Moors provide an important habitat for a number of protected bird species, supporting breeding populations of merlin, golden plover, short eared owl, peregrine falcon and dunlin.

Site of Special Scientific Interest (SSSI)

2.1.6 There are three SSSIs within 10km of the Keighley facility:

- South Pennine Moors (2.5km north);
- Bingley South Bog (4km south east); and
- Trench Meadows (6km south east).

2.1.7 The South Pennine Moors SSSI has been designated for the rich assemblage of moorland, acid grassland and blanket bog plant species, including a number of rarer species, as well as the important bird populations that are supported by this habitat. There are also 3 areas of geological interest within the SSSI.

2.1.8 Bingley South Bog comprises a small mire with transitional fen and neutral grassland. This environment provides for a diverse flora including a number of locally uncommon or rare species.

2.1.9 Trench Meadows have been allocated SSSI status because of the rich flora associated with this area of neutral grassland which is of special interest.

Local Nature Reserves

2.1.10 There are two Local Nature Reserves (LNR) identified within 10km of the Keighley facility. The recorded Local Nature Reserve sites include:

- Ben Rhydding Gravel Pits (9.4km north east); and
- Sun Lane Burley in Wharfedale (9.4km north east).

2.2 Biodiversity Action Plan (BAP) Sites

2.2.1 There are numerous patches of Woodland and Pasture BAP Priority Habitat surround the site, including significant areas 250m south, 3.7km east, 9.7km north east, 9.4km north east and 9.4km south east of the site.

2.3 Priority Species

2.3.1 In addition to the protected habitats a number of BAP priority species are present in the area. These include sightings of dunnoek, song thrush and common toad on the site of the installation. These species were all identified within the planning application and strategies have been put in place to mitigate the impact of the development on these populations.

2.3.2 The following birds are known to be present close to the site:

- Curlew;
- Grey Partridge; and
- Lapwing.

2.3.3 A number of protected birds are present further away but still within 10km of the site, including:

- Redshank (3.5km north east);
- Snipe (3.5km north east);
- Turtle Dove (7km south);
- Twite (7.4km south);

- Yellow Wagtail (9km north east / 10km north west); and
- Tree Sparrow (9km north east, 10km north west).

3 POTENTIAL RISKS AND MITIGATION MEASURES

3.1.1 The facility will accept a range of non-hazardous waste materials that will undergo incineration in order to generate power. If not properly managed the activities conducted during these operations may generate dust and litter or attract vermin. The operation could also cause emissions to air which may be toxic, lead to acid deposition or lead to nutrient nitrogen deposition if they are not subject to proper abatement.

3.1.2 Dust and litter may have a direct impact on flora and fauna. Without proper controls there is also the potential for toxins to be introduced into the air or into water bodies close to the site causing direct damage.

3.1.3 Emissions from the stack may contain nitrogen oxides or ammonia, which can lead to deposition of nutrient nitrogen. This means that they may fertilise soils allowing common species of plant to out compete rarer species that often thrive in low nutrient conditions.

3.1.4 Nitrogen oxides, sulphur dioxide and hydrogen chloride may also be released in emissions to air. These species form acids when they dissolve in rain water and so contribute to acid deposition or “acid rain”, which can damage plant populations.

3.1.5 In order to mitigate against these effects, the site is fitted with effective abatement equipment and robust site infrastructure. In combination with the management systems that will be in place these will achieve good control of emissions and the potential for impacts will be very low.

3.2 Prevention of Emissions to water

3.2.1 The site is constructed with impermeable concrete surfacing to all waste storage and processing areas, and a sealed drainage system. This means that any contaminated run-off from the site will be unable to drain into the ground or escape off site.

- 3.2.2 All liquids stored on site will be kept in appropriate leak proof tanks or containers and will be provided with drip trays or bunding appropriate to the quantity of liquid stored in the tank.
- 3.2.3 All silos will be located over the impermeable pavement and within the sealed drainage system so that in the event of a leak or spill the contents are contained on site.
- 3.2.4 There will be no discharges to surface water other than clean roof water or drainage from clean areas of the site, which are not used for waste storage or processing. Process water will be recirculated and reused on site. Spent boiler water will be discharged to foul sewer when necessary.
- 3.2.5 The waste bunker has been designed such that should there be a fire on site fire water will be retained within the bunker and cannot run off to local surface water courses.
- 3.2.6 Regular inspections and continued maintenance will ensure that the drainage system is operating efficiently. With the exception of air pollution control residues, which are stored in a sealed silo, all waste storage and treatment operations will be undertaken within a building, which will further limit the chances of leachate or other waste products causing contamination outside of the site.

3.3 Control of Emissions to Air

- 3.3.1 Emissions to air will be controlled using Best Available Techniques (BAT).
- 3.3.2 The first stage of minimising emissions is to ensure proper control of the combustion process. The furnace has been subject to proper design including CFD modelling to demonstrate that all gases will be subject to a minimum of 2 seconds exposure to temperatures of 850°C or more. This ensures that complete combustion occurs and limits emissions of CO and other products of partial combustion. In accordance with chapter IV of the Industrial Emissions Directive the furnace will be provided with auxiliary burners. Diesel will be provided as a back-up fuel and will be utilised should the temperature start to fall so that this requirement is met.
- 3.3.3 The temperature within the exhaust gas system will also be controlled with appropriate heat exchangers to allow rapid cooling of the exhaust air and minimise

formation of dioxins and furans (which is known to occur at temperatures approximately between 250°C and 400°C).

- 3.3.4 Calcium oxide (quick lime) and pulverised activated carbon (PAC) will be introduced into the gas stream. Calcium oxide acts to neutralise acid forming gases whilst activated carbon has a large surface area to which metals and other contaminants will adsorb.
- 3.3.5 The exhaust air will then pass into a bag filter which is pre-coated with lime to further neutralise acid forming gases. The bag filters will trap dust, PAC with adsorbed pollutants and reaction products from the neutralisation reaction.
- 3.3.6 Periodically a pulse of compressed air will be used to clear the debris from the inside of the filter. This will fall into a collection area, from where it can be sent to the recirculation and regeneration system (which allows reuse of the pollution control chemicals) or be conveyed by an enclosed system to the air pollution control residue silo pending disposal at an appropriate facility.
- 3.3.7 The gas will then pass through a Selective Non-Catalytic Reduction Unit. Here ammonia is introduced to the gas. The ammonia reacts with nitrogen oxides forming nitrogen and water that can be safely released to the atmosphere.
- 3.3.8 Finally, the treated exhaust gas will be vented to atmosphere via a 60m stack to allow adequate dispersion.
- 3.3.9 Through-out the system is subject to close monitoring and control. Monitoring will be carried out in full compliance with Annex VI of the Industrial Emissions Directive. In addition, monitoring will include dioxin like PCBs and, because it is used for pollution control, ammonia, to make sure that it is fully reacted and there is no ammonia slip. A summary of the monitoring programme is provided in the Monitoring Report.
- 3.3.10 The system is computer controlled and dosing of lime, PAC and ammonia will be adjusted automatically to ensure that the emissions remain within the set criteria and are fully compliant with the conditions of the environmental permit.

- 3.3.11 In addition, differential pressure will be monitored at the filter bags and an alarm will be raised should a bag be damaged, allowing swift repairs to be made.
- 3.3.12 To control other emissions to air combustion air will be drawn from above the waste pit, so that odours and airborne dust are taken from the tipping hall into the incineration line, ensuring that they are destroyed within the surface and do not cause fugitive emissions.
- 3.3.13 Good operational management systems that include regularly sweeping of paved areas will prevent a build-up of dust or debris in external areas. All spillages will be cleaned up immediately. Dusty materials will be cleared by vacuuming and dry sweeping will not be used.
- 3.3.14 The silos for the pollution control compounds and air pollution control residues will be vented via dust filters to prevent any fugitive emissions of dust due to displaced air when the silos are filled. Written filling and emptying procedures will apply to minimise the risk of leaks or spills during delivery and collection.

3.4 Litter and pests

- 3.4.1 All waste will be unloaded directly into the bunker, minimising the opportunity for emissions of dust or litter during off-loading. The site will be inspected daily, and any loose waste noted will be collected and returned to the bunker.
- 3.4.2 Waste within the bunker will be mixed to provide aeration and minimise decomposition or self-combustion. Doors will be kept closed other than when needed for access or egress, limiting the opportunity for access by pests and preventing pests from breeding.
- 3.4.3 The installation will be inspected on a regular basis and a pest control contractor will be retained and will make regular visits to ensure that infestations do not occur.

3.5 Maintenance

- 3.5.1 All pollution control systems will be subject to regular inspection and maintenance in accordance with a planned preventative maintenance programme in order to ensure that they remain fit for purpose and function correctly at all times.

3.5.2 These measures will minimise emissions associated with operational handling, and processing of waste, protecting the local environment and any protected habitats nearby.

4 AIR QUALITY MODELLING

4.1.1 In order to demonstrate that emissions from the site will not impact human health or local habitats in depth modelling has been carried out. The air quality model predicted air quality at the protected habitats and also predicted likely acid deposition and nutrient deposition. The model took account of the likely emissions from the facility.

4.1.2 The air quality model was used to forecast levels of released substances at European and nationally designated habitat sites within 10 km of the proposed facility.

4.1.3 Critical levels and critical loads have been set for different types of protected habitat and are available from the Air Pollution Information System (www.APIS.ac.uk) supported by the Joint Nature Conservation Committee, the Environment Agency and others. The critical levels and critical loads set out the levels at which air pollutants may start to impact on sensitive plant communities. These levels have been used to assess the impact of emissions from the site.

4.1.4 Air Quality is assessed against critical levels to demonstrate that they will not impact flora and fauna at protected habitats sites. Deposition is measured against critical loads.

4.1.5 Table 4:1 below, sets out the critical levels and critical loads applicable in this case and provides the results of the air quality model.

Table 4:1 Maximum deposition rate benchmarks for released substances	
Substance	Maximum deposition rate (mg/m ² -day)
Arsenic	0.02
Cadmium	0.009
Chromium	1.5
Copper	0.25
Lead	1.1
Mercury	0.004
Nickel	0.11

4.1.6 The results show that at the SAC, SPA and SSSIs the process contribution of NO_x, SO₂ and NH₃ will be less than 0.53% of the critical level and the impact could therefore be considered insignificant. The worst-case impacts are predicted to occur at South Pennine Moors SSSI/SAC/ SPA: Ilkley Moor section where the results showed levels would be less than 0.80%. When considered in combination with background levels the air quality at every protected site was well within the critical level.

4.1.7 It is understood that no planning permission has been granted, or valid applications made, for developments in the vicinity of the proposed facility which could be considered as having a potential cumulative impact with the proposed facility.

4.1.8 Air pollution can be deposited in soils, either as particulates or dissolved in rain. The model therefore also considered nutrient nitrogen deposition and acid deposition as a result of stack emissions from the facility. It was demonstrated that at the SAC, SPA and SSSIs the process contribution of nutrient nitrogen would be less than 1% of the critical load. It can therefore be concluded that emissions from the site will not impact on local habitats as a result of nutrient deposition or acid deposition.

4.1.9 The results of the model show that the facility will not impact on local habitats either alone or in combination with other facilities that may emit similar pollutants. It can therefore be concluded that the installation will not cause damage to vegetation within any protected habitat, either directly, via air pollution, or via deposition on to plants and soils. All emissions are well within the recommended limits.

4.1.10 The full results are included in the Air Quality Impact Assessment Report.

5 STAGE 1 – RELEVANCE

- 5.1.1 In assessing the impact of an installation on protected habitats there are a number of stages. Stage one determines whether an assessment is relevant by screening for habitats within a given distance of the installation. In the case of an energy from waste plant the set distance is 10km.
- 5.1.2 Stage one screening identified a number of protected sites, discussed above, which require further consideration to demonstrate that they have been fully protected. In accordance with the guidance a stage two assessment has been carried out by completing a risk assessment matrix to determine whether there will be any significant effects on the features of interest.

6 STAGE 2 – SIGNIFICANT EFFECTS

- 6.1.1 Where there are protected sites within 10km of the installation stage 2 is to assess whether there are any emissions from the installation that may cause a significant effect. Where this is the case stage 3 and 4 allow for a more in-depth analysis of the impact and recommendations regarding further mitigation. Where stage 2 concludes that there will be no significant impact, as is the case in this instance, then no further assessment is required, and it can be concluded that the site will not cause any detriment to local habitats.
- 6.1.2 All potential hazards from the facility have been considered for possible significant effects on the SSSI, SAC, SPA, BAP areas and Local Nature Reserves areas identified in the Stage 1 screening. The issues considered are summarised in Table 2.
- 6.1.3 Table 6:1 provides a qualitative assessment that shows activities undertaken will not have any significant effects on the SAC, SPA SSSIs, BAP sites or Local Nature Reserves.

Table 6.1: Potential Impact of Installation Activities

Hazard	Surface Water	Plant Communities	Animal Communities
Toxic contamination	<p>Insignificant impact</p> <p>Waste will be deposited and stored in a reinforced waterproof concrete waste bunker and processed in an enclosed building. Any diesel or oils will be stored in appropriate tanks or containers with appropriate secondary containment in accordance with the Oil Storage Regulations. Operations occur on an impermeable pavement with sealed drainage, ensuring that leachate or pollutants are not allowed to escape.</p>	<p>Insignificant impact</p> <p>Impermeable surfacing and sealed drainage prevent uncontrolled emissions to water or land. Waste storage and treatment will be carried out in buildings or in sealed containers minimising windblown dust. Emissions are in accordance with Annex VI of the Industrial Emissions Directive (IED). Effective abatement is in place to control emissions to air. Air dispersion modelling has been completed to demonstrate that air quality standards will not be at risk.</p>	<p>Insignificant impact</p> <p>Impermeable surfacing and sealed drainage prevent uncontrolled emissions to water or land. Waste storage and treatment will be carried out in buildings or in sealed containers minimising windblown dust. Emissions are in accordance with Annex VI of the Industrial Emissions Directive (IED). Effective abatement is in place to control emissions to air. Air dispersion modelling has been completed to demonstrate that air quality standards will not be at risk.</p>
Acid Deposition	<p>Insignificant Impact</p> <p>Sealed surfacing and drainage and appropriate storage with secondary containment will prevent emissions to water that could cause acidification.</p>	<p>Insignificant Impact</p> <p>Air quality modelling has been undertaken. This showed that acid deposition was well within the critical loads and emissions from the site would not impact local habitats.</p>	<p>Insignificant Impact</p> <p>Air quality modelling has been undertaken. This showed that acid deposition was well within the critical loads and emissions from the site would not impact local habitats.</p>
Nutrient enrichment	<p>Insignificant impact</p> <p>Waste will be deposited and stored in a reinforced waterproof concrete waste bunker and processed in an enclosed building. Any diesel or oils will be stored in appropriate tanks or containers with appropriate secondary containment in accordance with the Oil Storage Regulations. Operations occur on an impermeable pavement with sealed drainage, ensuring</p>	<p>Insignificant impact</p> <p>Impermeable surfacing and sealed drainage prevent emissions to water or land. Waste storage and treatment will be carried out in buildings or in sealed containers minimising windblown dust. Emissions are in accordance with Annex VI of the Industrial Emissions Directive (IED). Effective abatement is in place to control emissions to air. Air dispersion modelling has included consideration of deposition of</p>	<p>Insignificant impact</p> <p>Impermeable surfacing and sealed drainage prevent emissions to water or land. Waste storage and treatment will be carried out in buildings or in sealed containers minimising windblown dust. Emissions are in accordance with Annex VI of the Industrial Emissions Directive (IED). Effective abatement is in place to control emissions to air. Air dispersion modelling has included consideration of deposition of nutrient nitrogen at the SSIs and SAC and shown that</p>

Table 6.1: Potential Impact of Installation Activities

Hazard	Surface Water	Plant Communities	Animal Communities
	that leachate or pollutants are not allowed to escape. There is no pathway for nutrients to reach surface water.	nutrient nitrogen at the SSIs and SAC and shown that levels will be well within the relevant critical loads.	this will not be an issue and shown that levels will be well within the relevant critical loads.
Habitat loss	<p>Insignificant Impact</p> <p>There will be no loss of any woodland pasture BAP priority habitat, or habitat within the SAC, SPA, SSSIs or LNR. The pond that is present on site will be lost during development. This would affect those plants and animals that reside within or around the pond. A new SUDs system will be developed as part of the development which will provide new wetland habitat.</p>	<p>insignificant Impact</p> <p>There will be no loss of any woodland pasture BAP priority habitat, or habitat within the SAC, SPA, SSSIs or LNR. The pond that is present on site will be lost during development. This would affect those plants and animals that reside within or around the pond. A new SUDs system will be developed as part of the development which will provide new wetland habitat.</p>	<p>insignificant Impact</p> <p>There will be no loss of any woodland pasture BAP priority habitat, or habitat within the SAC, SPA, SSSIs or LNR. The pond that is present on site will be lost during development. This would affect those plants and animals that reside within or around the pond. A new SUDs system will be developed as part of the development which will provide new wetland habitat.</p>
Smothering	<p>Insignificant impact</p> <p>The sealed surfacing and drainage system will prevent any emissions of suspended solids to local surface water bodies.</p>	<p>Insignificant Impact</p> <p>Unloading of waste takes place inside the waste reception hall which has an air extraction system to maintain negative pressure inside the building and prevent emissions. Waste will be delivered in covered vehicles. Procedures are in place for the proper control of air pollution control residues, which will be handled in an enclosed system. The bag filters achieve very low emissions of particulates from the stack. Management procedures are in place to keep the site tidy. Emissions of litter and dust are controlled and modelling shows local air quality will be fully protected.</p>	<p>Insignificant Impact</p> <p>Unloading of waste takes place inside the waste reception hall which has an air extraction system to maintain negative pressure inside the building and prevent emissions. Waste will be delivered in covered vehicles. Procedures are in place for the proper control of air pollution control residues, which will be handled in an enclosed system. The bag filters achieve very low emissions of particulates from the stack. Management procedures are in place to keep the site tidy. Emissions of litter and dust are controlled and modelling shows local air quality will be fully protected.</p>

Table 6:1: Potential Impact of Installation Activities

Hazard	Surface Water	Plant Communities	Animal Communities
Disturbance	Not applicable	Not applicable	<p>Insignificant Impact.</p> <p>The development is in an industrial area. Incineration activities will take place inside a building, providing noise attenuation. Plant used on site will be regularly maintained. Lighting will be appropriately directed towards the site and operations. It is therefore considered that the development will not give rise to additional disturbance to local bird populations.</p>
Predation	Not applicable	Not applicable	<p>Insignificant Impact.</p> <p>The site is unlikely to attract foxes, rats, gulls or corvids as the following controls apply. Waste is kept within a purpose built waterproof reinforced concrete waste bunker inside a building. There will be good first in first out management of waste and the site will be regularly cleaned to avoid any build-up of residual material that might harbour pests. Doors will be kept closed except for access and egress, excluding pests from the building as far as possible. Regular inspections for signs of infestation will be carried and a pest contractor will be required to attend where necessary to control the population of vermin.</p>

7 CONCLUSION

- 7.1.1 The control measures that are to be put in place at the facility will ensure that there are no significant emissions from the site. Endless Energy Ltd will implement an Environmental Management System at the site to ensure that the facility is properly managed and maintained to prevent or, where that is not possible, minimise emissions.
- 7.1.2 Best Available Techniques will be employed on site to achieve compliance with the requirements of chapter II and chapter IV of the Industrial Emissions Directive. This will include close control of waste receipts and the combustion process with comprehensive abatement for emissions to air.
- 7.1.3 The nearby protected sites such as SSSIs, BAP areas and Local Nature Reserves have been considered in the risk assessments. It has been demonstrated that the facility will not cause any adverse impact on these protected habitats given the measures in place to control emissions from the site.

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