

Naomi Daniel
Environment Agency
Via email

Thursday 29 January 2026

Ref: K0419/ENV/LT/006

Re: Enviroo Plastic Recycling Facility – K0419
Duly Making Response

Dear Naomi,

On behalf of Enviroo Project Co Limited (Enviroo, the Operator), Ayesa have prepared this letter to respond to the Environment Agency (the Agency)'s email titled 'EPR/JP3523MD/A001 Enviroo Project Co Limited Return Not Duly Made' and issued on 19 January 2026.

We note from your e-mail that it is normal practice to offer 10 days to provide any additional information requested during your Duly Making checks.

Thank you for the clarification provided within your e-mail which we have now reviewed. Although we believe that some of the information requested has already been provided or is not required, we have now provided all the requested information, i.e. within 10 days of your information request.

We would therefore be grateful if you would duly make this application, having regard to the following:

- The application fee provide is sufficient to cover the now agreed fee (including that for review of the DEMP) and your costs associated with the Duly Making process, we calculate the following: application fee paid £33,806.40 – duly making costs £1,613.00 – agreed fee (inc. DEMP) £23,607.00 = £8,586.40 to be refunded. A limited refund would be preferable to full refund and subsequent re-submission.
- The Agency's advice during the enhanced pre-application process (12 November 2025) was to submit the application as detailed in the pre-application discussions to ensure its prioritisation ***“As such I suggest you submit the application for us to consider & withdraw this pre-application. If you decide not to withdraw the pre-app I am afraid we would not be able to prioritise it above other applications.”***
- This application has significant time constraints associated and on 10 December 2025, the Agency agreed to expediate the application.
- Although the operator has offered on numerous occasions to arrange site visits and to present details over Teams to explain the process and discuss the application all such offers have been rejected by the Agency.
- There has been no communication from the Agency during the Duly Making process.

- In order to expediate the application, could the same officer who did the duly made checks be assigned the application.

The additional information now provided is detailed below.

Information Requested

Form B2

1. *Provide named TCM and evidence of competence*

The application has ticked the box certified CMS to be in place within 12 months of issue but evidence of contract with accredited certified scheme has not been provided. The application later states TCM evidence provided within appendix C, but no appendix C within the document.

Legal operator and competence requirements: environmental permits - GOV.UK

This typographic error has been removed from Technical Standards and Appropriate Measures report (K0419-AYE-R-ENV-00003). As stated within Form Part B2, a CMS will be in place within 12 months of issue and as stated in the Permit Application Report (K0419-AYE-R-ENV-00001) the certificates will be provided when available. The Operator has confirmed they will use SharePoint as the working CMS. A licence has been purchased and Dani Curtis from YourISO Certification and Business Development Consultant has been appointed to develop the CMS.

2. *Provide the required plans, diagrams and descriptions to support the application.*

Site layout plans required with surfacing, kerbing, sealed drainage identified. Site layout within storage and process buildings and detailed layout of WwTW identifying each tank, abatement, emission to air points, discharge to water points and monitoring points. Provide full NGR's for emission, discharge and monitoring points.

Develop a management system: environmental permits - GOV.UK

The following drawing were submitted with the application and included the information requested above, Proposed Drainage Layout (250064-WDK-XX-XX-DR-C-33001), Proposed Site Plan (250064-WDK-XX-XX-D-A-04000), Proposed Fire Strategy (250064-WDK-01-XX-D-A-14000), Permit Boundary Plan (K0419.1.001) and Sensitive Receptor Plan (K0419.1.002).

The additional drawings below have also been provided with this response

- Proposed Site and Equipment General Arrangements (250074-WDK-00-SI-DR-A-10101)
- Proposed Drainage Overlay with discharge and monitoring points (no drawing reference)
- Proposed Water Catchment Plan (210070-WDK-00-SI-DR-C-33001)
- Boundary Treatments Plan and Details (250064-WDK-01-XX-D-A-10001)
- Proposed External Works (250064-WDK-XX-XX-DR-C-32001)

The WwTP details are shown in Figure 2 of the updated Technical Standards and Appropriate Measures report (K0419-AYE-R-ENV-00003).

The requested NGRs are summarised below:

Surface water

- Outlet 1 discharge point SJ 46564 76383
- Outlet 1 monitoring point SJ 46580 76389
- Outlet 2 discharge point SJ 46657 76461
- Outlet 2 monitoring point SJ 46626 76451
- Outlet 3 discharge point SJ 46477 76505
- Outlet 3 monitoring point SJ 46554 76518

Air

- LEV1 emission point SJ 46514 76423
- LEV2 emission point SJ 46509 76424
- Boiler 1 emission point SJ 46523 76419
- Boiler 2 emission point SJ 46524 76418

Plans showing their locations have been appended as Appendix D and E of the Technical Standards and Appropriate Measures report (K0419-AYE-R-ENV-00003).

3. Provide a stage 3 assessment to accompany your SCR.

Identify relevant hazardous substances you will be storing, using or producing. Include a stage 1-3 assessment, and where this identifies risk establish baseline data.

Communication from the Commission — European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions

Section 2.3.1.3 loss of containment of the Technical Standards and Appropriate Measures report (K0419-AYE-R-ENV-00003), submitted as part of the permit application provides details of the chemicals to be used and states that all tanks and storage located within the PET Plastics Recycling Facility (PETPRF) and Wastewater Treatment Plant (WwTP) will be installed on an impermeable surface with secondary containment in accordance with CIRIA guidance “containment systems for the prevention of pollution: secondary, tertiary and other measures for industrial and commercial premises” dated 2014 and associated regulations. The PETPRF is classified as a waste operation. Only the WwTP is classified as an installation.

All containers and tanks associated with the WwTP will be bunded with a capacity of 110% to meet the requirements of CIRIA C736. Consequently, no discharges to land or groundwater is likely to occur.

Nevertheless, the Site Condition Report (K0419-AYE-R-ENV-00008) has been updated to include stage 3 assessment at Appendix C.

Form B3

- 4. Provide visual, rather than written, process flow diagrams for each treatment process as identified within the NTS and provide detailed visual process flow for the WwTW.*

The process flow should detail each step within the process, where additions to the process are made, where waste comes out of the process, where abatement is connected or used. Develop a management system: environmental permits - GOV.UK

A Process Flow Diagram (Enviroo PDF C1.0), a Control Narrative (J1413 – Enviroo WWTP) and Genco drawings have been attached as Appendix A to the Technical Standards and Appropriate Measures report (K0419-AYE-R-ENV-00003) for the WwTP.

Additionally, a Process Flow Diagram for the PETPRF has been attached as Appendix B to the Technical Standards.

*5. Provide infrastructure detail and secondary containment for the WwTW
We are unsure of the number of tanks within the WwTW, where they are, how the design pipework connects them, the surfacing and secondary containment of this area and how the design was made from spill modelling and calculations.*

Section 5.3.9 has been added to the Technical Standards and Appropriate Measures report (K0419-AYE-R-ENV-00003) to add further details regarding the infrastructure and secondary containment.

Provide layout plans labelled to identify storage areas, bays, capacities for the enclosed storage building and plastic process buildings. Develop a management system: environmental permits - GOV.UK

Proposed Site and Equipment General Arrangements (250074-WDK-00-SI-DR-A-10101) includes the storage areas, bays and capacities for the goods in / storage building and process building. Additionally, these details are contained in the updated Fire Prevention Plan (K0419-AYE-R-ENV-00007).

*6. Provide model files for your Noise Impact Assessment (NIA)
Electronic model files have not been provided with the NIA, we require these to check assumptions and modelling. This assessment then assists the assessment of the NMP.*

The NIA electronic model files have been sent with this response.

*7. Provide a Dust and Emissions Management Plan (DEMP) is required as you are treating waste that can have mixtures of metal and paper and can produce fine and dusty materials. The site is within 500 meters of a sensitive receptor namely the two commercial and industrial areas used for workplaces at 230m and 220m.
Control and monitor emissions for your environmental permit - GOV.UK*

We do not believe a DEMP is necessary for this inherently low dust risk operation, this is supported by the relevant Agency guidance, nevertheless a DEMP (K0419-AYE-R-ENV-00009) is provided with this submission.

*8. Provide model files INCE_v1_22
Model files for the air quality assessment have not been provided.*

The INCE_v1_22 model files were appended to the ERA ref. K0419-AYE-R-00002 as appendix B and submitted to the Agency as part of the application. However, for your convenience, these files have been re-sent with this response.

Form B6

9. *Provide a completed form B6 for the three new discharges to surface water from the site.*

Named in the application as outfall 1: surface water and package treatment plant 1, outfall 2: surface water, outfall 3: effluent treatment plant, surface water and package treatment plant 2. Provide NGR's for the discharge and monitoring points.

Application for an environmental permit: part B6 bespoke water discharge activity, groundwater activity, or point source emission to water from an installation - GOV.UK

The Part B6 application forms requested are provided.

10. *Provide H1 assessment tool used to assess emissions to water
This accompanies the H1 assessment report provided with the application.*

These assessments were provided within the permit application, appended to document K0419-AYE-R-ENV-00005 as 'Appendix A – Risk Assessment Calculations'. Nevertheless, this report has been re-submitted.

In summary:

- The typographic error has been removed from Technical Standards.
- Additional technical drawings have been provided in response to questions 2 and 6.
- The SCR has been adjusted to include the detail within the Technical Standards and in response to question 3.
- Process flow diagrams have been provided to supplement the written descriptions already provided in response to question 4;
- In response to question 7 the noise modelling files are provided, in response to questions 9 the dust model files are re-submitted, and in response to question 11 the model files and spreadsheets are re-submitted.
- A DEMP has been produced in response to question 8 although not believed to be required; and
- Application forms B6 have been completed.

As stated previously Enviroo are happy to arrange a site visit and support the Agency in any way to expediate the determination process.

Yours sincerely
For Ayesa,

John Baxter
Technical Director