

**Your Ref:**  
**Our Ref:** CRM.0565.014.PE.L.001

**Date:** 15 August 2024  
**Email:** jane.hall@enzygo.com

**By Email:** Catherine.Harvey@environment-agency.gov.uk

Catherine Harvey  
Permitting Officer – Installations (Manufacturing)  
Environment Agency  
Rivers House  
Sturry Road  
Canterbury  
CT2 0AA

Dear Catherine

## RE: Argent Energy Limited Permit Variation – Request for Information

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### Environmental Permitting (England and Wales) Regulations 2016

**Application reference:** EPR/LP3233DK/V008

**Operator:** ARGENT ENERGY (UK) LIMITED

**Facility:** Argent Biodiesel Stanlow Plant, Oil Sites Road, Ellesmere Port, CH65 4BD

Thank you for your email dated 7 August requesting further information. We have reviewed the questions raised and provide responses below.

**Additional fee requested:** This has now been paid by the Operator.

**Question 1:** *With regards to Table 1 of the Application Report: We need you to confirm whether the proposed 185,600 tpa is for a maximum input that comprises FOG and tallow and is therefore the total proposed maximum input for activities AR6 and AR7 together.*

**Response:** 185,600 is both together, added clarity in **Table 1** in the report in a footnote. 185,600 is the maximum total input into the site comprising tallow plus other FOGs.- The Operator seeks to remove the sub-limit applied to tallow to allow greater flexibility with feedstocks.

**Question 2:** *With regards to Table 2 of the Application Report, the operator, company registration number and registered office address do not match that provided on Part A of the application forms. We need you to confirm these details. I believe the details in Table 2 are those of the transferee company for the transfer application that has been submitted, which will only become relevant to this application if the transfer is determined first.*

**Response:** We would like to request that the transfer application is processed alongside this Variation application. This is why the details on this application are stated as being the new operator. Explanation is provided in **paragraph 1.1.5** in the updated report.

**Question 3:** *With regards to the feed oil storage tank for the new esterification process, we need you to assess the environmental risk of the tank having a free vent to atmosphere (eg odour risk).*

**Response:** The Application Report has been updated for clarity. This tank is vented within the treatment building only upon filling due to displacement where a small volume of displaced air would occasionally

be released. There is no vent to the external atmosphere from the feed oil storage tank, only within the building. Emissions are therefore minor and contained within the building. See updated **paragraph 4.4.3**.

**Question 4:** *Paragraph 4.5.13 of the Application Report states that the brown grease is collected and used to produce biodiesel in an external biodiesel processing plant. Paragraph 4.5.14 states that brown grease is transferred to Argent's pre-treatment processes. We need you to clarify what happens to the brown grease once it is collected from the FOG Treatment Facility.*

**Response:** **Paragraphs 4.5.13 and 4.5.14** have been updated in the report to clarify that the brown grease is transferred to Argent's on-site, existing biodiesel production plant.

**Question 5:** *We need you to provide a quantitative risk assessment that shows emissions from A11 and A12 screen out under a worst-case scenario, to justify that further assessment of these emissions is not required. Please see our guidance: [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit). Linked to this, we will need to carry out a habitats assessment due to protected habitats within the relevant screening distance, which requires an additional charge of £779. I note that an action has been assigned to fully quantify these emissions so if necessary the risk assessment can be based on worst-case estimates with a justification of how the estimated values have been derived.*

**Response:** See H1 Assessment new **Appendix G** in the updated report. New paragraph added to report (6.3.16) explaining that emissions are estimated and an improvement condition would be welcomed to confirm the assumptions made in the H1 Assessment.

**Question 6:** *In section 4c of Part C2.5 of the application form, you have stated that you would like us to permit existing MCP 1-5MWth / Tranche A SG as part of this variation application, with post-dated compliance deadlines in the permit. We therefore need you to complete and submit the combustion plant spreadsheet for these MCP/SG, available here: [Application for an environmental permit: part C2.5 vary to add MCP or SG or change an existing MCP or SG permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/application-for-an-environmental-permit-part-c25-vary-to-add-mcp-or-sg-or-change-an-existing-mcp-or-sg-permit)*

**Response:** See **Appendix H** of updated report, which is referenced in para 4.3.5.

In addition to the information provided above, following the Environment Agency's discussions with the Operator, a review has been completed of the redacted sections whereby a claim for commercial confidentiality has been made. The updated report reflects these discussions and wholly replaces the previous report's redacted sections. As per the original application, two versions of the report have been submitted comprising a complete document (redacted sections included but highlighted in pink), and a redacted version.

Yours sincerely

*E J Hall*

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**Associate Consultant**  
Enzygo Ltd