

Sol Environment Limited

Unit 5.3, Paintworks, Bristol,
BS4 3EH

t. +44 (0) 1179 372811
enquiries@sol-environment.co.uk



Hayley Jenkins Jones
Environment Agency
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

24th February 2026

Our Ref: SOL_25_P050_PYR

Dear Hayley,

RE: ENDOLYS LTD, PLASTICS TO OIL FACILITY – EPR/MP3821LP/A001

Further to your email dated 10th February 2026, please find below a response to each of your questions in turn.

1. *Form B2, Question 5d Are you applying for an activity that includes the storage of combustible wastes: The following aspects required by our guidance on a Fire Prevention Plan were not provided:*

Site details

- *Include the following information clearly at the beginning of the Fire Prevention Plan, using the format below:*
 - *Site name*
 - *Site address*
 - *Operator name*

Description of site activities:

- *Provide a full list of all activities carried out on site, including:*
 - *What each activity involves*
 - *Where on the site it takes place*
 - *How it is carried out*
 - *What machinery or equipment is used*

Simplified site plan

- *Submit a simplified site plan showing all site infrastructure. This should follow the style of Figure 1.3 in the Supporting Document (page 6)*

Please find an updated Fire Prevention Plan provided within *Annex A* of this letter. This has included site details on page 1, a process description and listed activities in Section 3 and a simplified site plan on page 16.

2. *Form B2, Question 6 Environmental risk assessment (Air Quality Assessment): The following aspects required by our guidance were not provided in the Air Quality Assessment:*

- *Clarify why an Abnormal Emissions Assessment has not been provided with your application.*

An abnormal emissions assessment was provided in Section 5.4 of the AQA. For clarity, the AQA and associated modelling files has been resubmitted in *Annex B* of this letter.

3. *Form B3, Question 3 Operating techniques:*

- *Confirm whether the operating system will meet the IED Chapter IV requirement of maintaining a combustion temperature of at least 850°C for a minimum of 2 seconds during syngas combustion*

The operating system will have a syngas residence time of 1000°C for 1 second and Chapter IV ELV's will be met by the plant at all times. The operator seeks a derogation under Article 51(1) from the requirement of the 850°C/2second residence temperature and time. This derogation is being sought due to the process being a syngas combustion process and not a conventional waste incineration process which will instead be operated as a Section 1.2 activity. In line with the requirements of Article 42, all other Chapter IV requirements will be met.

- *Confirm whether an auxiliary burner is provided to raise the syngas combustion temperature to 850°C during start-up, and to maintain or restore this temperature if it falls below 850°C during operation*

There are no separate auxiliary burners in the process. The burner is a dual fuel burner that is fuelled by natural gas during start up, which then introduces syngas when the plant is up to temperature. When two reactors are online, there is sufficient excess syngas available for a self-sustaining combustion operation without the need for any supplemental natural gas. As such, the operator seeks a derogation under Article 51(1) from the requirement for an auxiliary burner.

4. *Form B3, Question 3a Technical standards (BAT assessment):*

- *Carry out and submit a BAT assessment for the emergency diesel generator in line with Emergency backup diesel engines on installations: best available techniques (BAT) - GOV.UK*
- *Submit copies of the emergency diesel generator specification sheets*

A BAT assessment for the emergency diesel generator has been undertaken and provided in *Annex C* of this letter, with the associated specification sheets.

5. *Form B3, Question 3b General requirements (Noise Impact Assessment and Noise Management Plan): The following aspects required by our guidance on Noise Impact Assessments and Noise Management Plans were not provided:*

Noise Management Plan

- *A “preliminary noise management plan” has been included within Section 8.2 of the Noise Impact Assessment. However, a separate standalone Noise Management Plan is required for permitting*
Provide a separate Noise Management Plan with reference to the Noise Management Plan Template document attached

A Noise Management Plan has been provided in *Annex D* of this letter.

Sensitive Receptors

- *The Noise Impact Assessment states “The predicted Specific Sound Level at the surrounding residential receptors has been modelled at 4 metres height above local ground level”. This is considered representative of first floor receptor heights, however the Premier Inn Darlington East hotel includes second floor hotel rooms*

Assess specific sound levels at second floor height at the Premier Inn Darlington receptor and update the Noise Impact Assessment results accordingly if higher specific sound levels are predicted

The Premier Inn Darlington East Hotel comprises of two-storey and three-storey buildings. The two-storey building is located closer to the Facility than the three-storey building. The noise model considers the noise impact at first floor level height of the closest building. The noise model indicates that the noise levels at the second level of the hotel building located further away are within 1dB of the predicted noise levels as presented in the report. The predicted Specific Sound Levels at all windows of the hotel are dominated by noise from HGVs arriving and departing from the Facility rather than from any plant or processes associated with the Facility. As stated in the ENIA, noise from HGVs is not expected to be readily distinguishable from other road traffic on Yarm Road (B6280) and therefore unlikely to result in adverse comment. For completeness, we have updated the report to consider both buildings. This has been provided in Annex E of this letter.

Background Sound Levels

- *Provide the raw data from the sound survey measurements at Measurement Positions 1 and 2 in an excel file or otherwise tabulated format. Include the time, date, LA90, LAeq and LAmx for each individual measurement.*

Background sound level data has been provided in *Annex E* of this letter.

Modelling

- *Provide the CadnaA noise model(s) used for the calculation of specific sound levels within the Noise Impact Assessment in the original file format.*

Modelling files for the Noise Impact Assessment are provided in *Annex E* of this letter.

6. *Form B3, Question 7a List all your combustion plant at the site and provide thermal input and operating hours for each:*

- *Confirm the input in MWth of the on site steam boiler.*

The rated thermal input of the steam boiler is currently anticipated to be 8.8MWth.

- *Confirm the number of gas engine generators at the Installation.*

There will be one gas engine generator at the installation.

7. *Form B3, Appendix 1, Question 13 Information to be provided by the operator to the competent authority for each Medium Combustion Plant as identified in Annex I of Medium Combustion Plant Directive (EU/2015/2193):*

- *Supply the co-ordinates of all MCPs on site as required by Annex 1 of the Medium Combustion Plant Directive (MCPD).*

An updated MCPD Spreadsheet, including co-ordinates, has been included in *Annex F* of this letter.

Enhanced pre-application

- *We have an outstanding payment of £1000 plus VAT on our system for the enhanced pre-app advice you received under reference number EPR/MP3821LP/P001. We cannot duly make your application until this amount has been paid. Payment information will be on the invoice you received for this pre-application.*

We have located a payment of £1,200 paid on the 9th January 2026. Please find invoice and payment receipt details in Annex G of this letter.

Should you have any further questions in relation to the above please do not hesitate to contact me.

Yours sincerely,



Emily Hingston

Annex A – Updated Fire Prevention Plan

Annex B – Air Quality Assessment

Annex C – Emergency Diesel Generator Details & BAT

Annex D – Noise Management Plan

Annex E – Updated Environmental Noise Impact Assessment, Raw Data & Modelling Files

Annex F – Updated Medium Combustion Plant Spreadsheet

Annex G – Pre-application Advice Payment Details