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Environment Agency Permitting Support,
NPS Sheffield
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Sheffield
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Date: 2nd July 2026

Dear Kirstie Lythgo,

RFI for EPR Permit Variation Application EPR/PP3237CR/V011 for Dimlington Gas Terminal

Following the permit variation application submitted on 10 April 2026, the Environment Agency sent a letter on 19 June 2026 requesting for additional information to be able to duly make the application.

The response to the EA's letter is as follows:

1. Environmental Management System (EMS) [Form Part C3, question 3]

EA Comment:

A copy of the operator's EMS, which is stated to be ISO 14001 compliant (dated 01/11/2025) has been provided. Although this does not reference the carbon adsorbers, the operator's BAT Assessment (BAT 1) confirms that the site Environmental Aspect Register has been updated since 12/06/2025. Please confirm that the EMS will be updated to include relevant information and procedures relating to the treatment plant before operation commences.

PUK Response:

The EMS procedure COM-003 will be updated to highlight the carbon adsorber operations under POP-DT-17.8 Rev Z3 (80 m3 Carbon filter operation for PFAS/PFOS removal).

2. Non -technical Summary (NTS) [Form Part C3, question 6]

EA Comment:

The NTS confirms that both the stormwater and firewater ponds are contaminated with PFAS but it is unclear from Figure 3 and Figure 4 how the water in the two ponds is treated before discharge.

Figure 3 indicates that the carbon filters are to be positioned between the storm water pond and the fire water pond. It's not clear whether the effluent from Carbon Filter 2 is mixed with the firewater in the pond or whether it is piped directly from the adsorber to the receiving ditch. Figure 3 also shows a line, marked in darker blue, that connects the stormwater pond and the firewater pond and it is not clear whether this is controlled in any way to prevent contaminated stormwater bypassing the carbon filters.

Figure 4 indicates that the carbon filters are located between the fire water pond and the discharge point. Figure 3 and Figure 4 therefore do not appear to depict the same configuration.

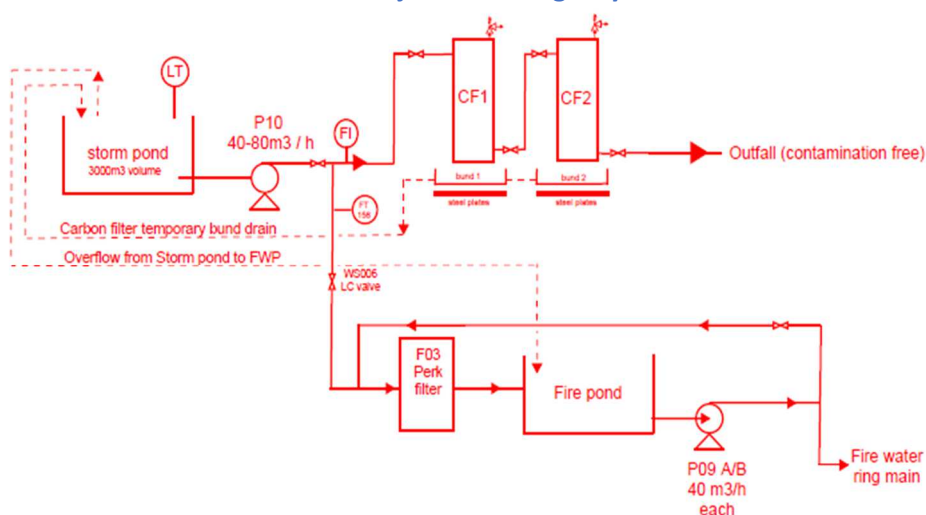
a. Please provide further explanation and a revised process flow diagram and/or site plot plan, if necessary, that clarifies how the system is configured to ensure that only treated effluent is discharged.

PUK Response:

Figure 3: The untreated effluent from the storm pond passes through Carbon Filter 1 and then Carbon Filter 2 for the final treatment. The treated effluent is transferred into the 6 - inch pipe located within the firewater pond and discharged into the drainage ditch. There is no mixing between the treated effluent stream and the water in the firewater pond, ensuring that only treated effluent is discharged from site.

There is a valve between the storm water pond and the firewater pond that allows storm water to be transferred to the firewater pond, there is also a gravity overflow pipe fitted between the storm and firewater pond to prevent overflow.

Water from the firewater pond is taken into the firewater ring main by pumps and is distributed to all major hazard areas on site in the event of a major site emergency.



Only the water in the storm pond is treated and discharged from site.

Figure 4 in the NTS shows the current physical location of the adsorbers, the configuration remains the same despite the location of the filters.

3. Operating / Best Available Techniques (BAT) [Form Part C3, question 3]

EA Comment:

The application proposes the use of larger carbon filters, each with a capacity of 80 m3/h.

a. Please confirm that the pumps associated with the treatment system have also been upgraded to match the capacity of the carbon filters.

PUK Response:

We are in the process of upgrading P10 pump to provide the full flow capacity.

4. Water Quality Assessment [Form C6, question 9]

EA Comment:

a. Please provide a copy of the Monte Carlo modelling files.

Note that whilst the only PFAS substance with a published EQS is PFOS, if EQSs for other PFAS substances become publicly available during determination we will require an assessment for those substances.

PUK Response:

The Monte Carlo modelling files have been attached to this email as requested.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Nicholas', followed by a long horizontal stroke.

Nicholas Abraham
PUK Environmental Advisor