ENVIRONMENT
& HEALTH

John McClean
John.McClean@environment-agency.gov.uk
Environment Agency Permitting and Support Centre
Quadrant 2,
99 Parkway Avenue,
Parkway Business Park,
Sheffield S9 4WF

Dear John,

Date 26/06/2025

Ramboll
240 Blackfriars Road
London
SE1 8NW
United Kingdom

T +44 20 7808 1420
https://uk.ramboll.com/environment-and-health

Ref 1620017369

Response to Environment Agency Request for Information for Permit Variation Application – EPR/XP3832NV/V004

A permit variation application was submitted by Ramboll, on behalf of Angus Fire Limited (referred to hereafter as "Angus Fire" or "the Client") to the Environment Agency (EA) on 29 April 2025. The permit variation application was to vary the Environmental Permit EPR/XP3832NV/V004 for the Angus Fire site located at Station Road, Bentham, Nr Lancaster, LA2 7NA (the "Site").

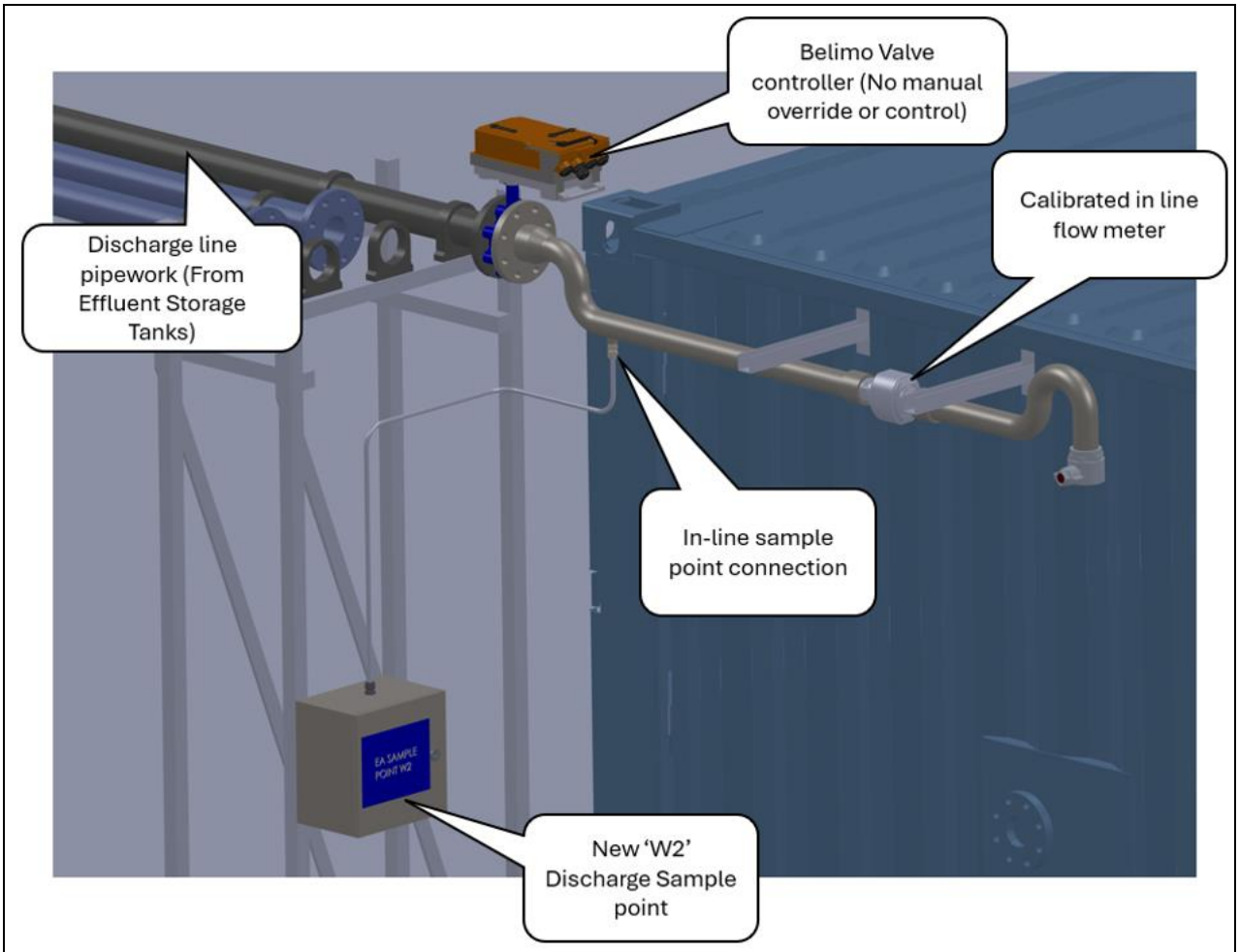
The application proposed to update the existing permit to include a waste operation to allow for treatment of contained stormwater collected on the Site and post-treatment discharge through a new discharge point (W2). The new discharge point is located at the sampling point for the discharge.

Following the submission of the permit variation application, the Environment Agency (EA) provided a request for information (RFI) of 13 June 2025 regarding some aspects of the application that were considered to be outstanding or required further confirmation.

This letter report has been prepared to provide/confirm the outstanding information requested in the EA's RFI of 13 June 2025.
Our response to the EA's RFI of 13 June 2025 is set out below:

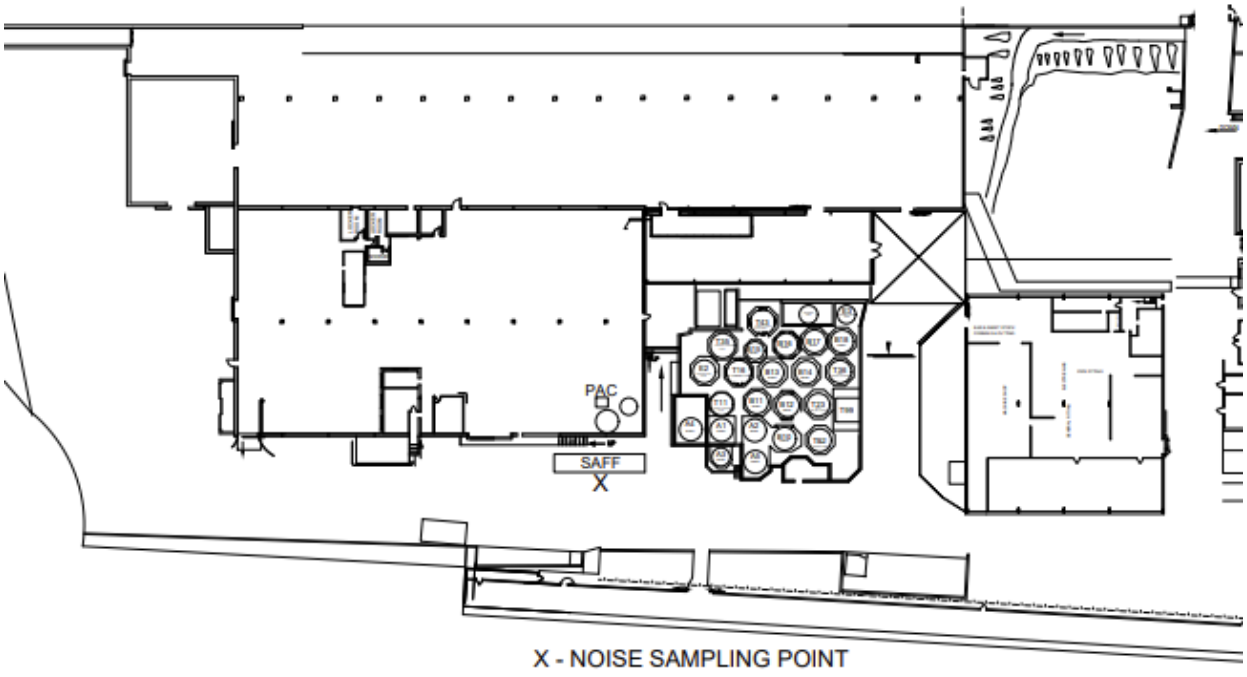
Ramboll UK Limited
Registered in England & Wales
Company No: 03659970
Registered office:
240 Blackfriars Road
London
SE1 8NW

Request for Information	Response
1. Medium Combustion Plant (MCP) Please assess all relevant emissions from this boiler in an H1 assessment to demonstrate that these screen out as having no adverse impact on the environment. Please demonstrate whether the costs of the upgrade of this boiler mean that it should be regulated as a 'new' or 'existing' MCP. If the operator wishes to derate the boiler to <5MW thermal input, define physical controls in place ensuring it cannot be operated greater than that thermal input.	Section 9 of the Permit Variation Application Report has been updated to outline that the boiler has been derated to have a maximum thermal capacity of <5 MWth. A certificate confirming the boiler cannot be operated at >5MW without significant third-party adjustments is presented in Attachment 1. In view of the boiler having a maximum thermal capacity of <5 MWth, the application of Medium Combustion Plant controls will not apply until January 2029.
2. Restrictions on Effluent Treatment Plant Please demonstrate how it is never possible that the Angus Fire Limited effluent treatment plant would treat effluent at a rate greater than 50m^3/day in accordance with RGN2 (A2.4).	Section 4.9 of the Operations Report has been updated to include the discharge process and operational capacity. The treatment plant is restricted to <50m^3/day by two specific aspects. The processing capacity of the treatment train is defined by the capacity of the PAC. Due to the processing times of the PAC unit, this cannot exceed 1.99 m^3/hour, equivalent to 47.8m^3/day. Alongside this, the treated effluent is stored in discharge tanks prior to discharge to allow confirmatory analyses to be undertaken, with the primary discharge control maintained using the Tank Farm Discharge PLC and a mechanically restricted valve and flow meter. A Belimo valve controller is installed in the discharge line which is limited to 2m^3/hour and has no manual override or control. This provides an additional physical limitation alongside the treatment capacity limitation of the PAC unit to maintain the proposed treatment and discharge capacity of 48m^3/day. In view of the additional information provided, it is considered that this item is now closed.



3. Noise. Please confirm the operating hours of the ETP and how these will minimise the impact of noise and vibration on off-site receptors. Please confirm what processes and/or equipment in the SAFF plant may be expected to cause noise. Please define the expected noise levels from these processes and/or equipment.	Section 13 of the Permit Variation Application Report and the Environmental Risk Assessment (ERA) have been updated to address these aspects. Noise monitoring was undertaken to demonstrate that the ETP would not result in an impact to off-site receptors. The SAFF unit is containerised and the doors of the unit are kept closed except for access. Inside the SAFF container adjacent to the SAFF primary processing vessel noise levels were recorded at 78.9dB(A) External to the container, adjacent to the SAFF primary processing vessel and immediately outside the container (where it is expected that the highest noise levels would be recorded), the noise levels were recorded at 55.5 dB(A).

	The PAC unit is fully enclosed within a building with any doors closed when not required for entry. It is proposed that the ETP will be operational 24 hours per day during the initial period of operation in order to process the significant backlog of water contained on site. However, following the initial period, the ETP can be operated during normal operating hours. Since the closest potential noise receptors are ~65m away, the levels of noise are not considered to be significant. In view of the updated information provided in Section 13, the ERA and additional information provided directly to the EA, these aspects are considered closed.



4. Emissions to water. Please confirm the foaming agent to be used in the ETP and submit a copy of its material safety data sheet (MSDS). Please update the H1 submitted to include the foaming agent used on site and use the PNEC within the H1 assessment tool to determine its impact	The MSDS for the foaming agent proposed for use in the new treatment process has been provided in attachment to this Letter Report (Attachment 2). The H1 assessment has been updated to include the assessment of the foaming agent proposed for use in the new treatment plant with the predicted no effect concentration (PNEC) used as the EQS in order to assess the potential impact of the foaming agent on environmental receptors. Section 10 of the Permit Variation Application Report has been updated to include the outcome of the H1 assessment and the updated H1 assessment is provided in Appendix 4. In view of the information provided in attachment to this Letter Report and the updated Permit Variation Application Report, these aspects are considered closed.
5. Appropriate measures. Please update Table 7-1 to demonstrate compliance against every element of every section of the appropriate measures.	Table 7-1 of the Permit Variation Application Report has been updated to demonstrate compliance against every element of every section of the appropriate measures. The updated information is provided in the '1620016737 Angus Fire Appropriate Measures Assessment' provided in Appendix 5 to the Permit Variation Application Report. In view of the updated assessment to demonstrate compliance with the appropriate measures this aspect is considered closed.
6. Waste definition. Please outline the limit of detection for those parameters which are reported as 'Below Limit of Detection'. Please ensure that where appropriate, the impact of these pollutants is assessed in the H1 tool at the limit of detection	Table 5-1 of the Permit Variation Application Report has been updated to include the Limit of Detection (LOD) for parameters which were reported as 'below limit of detection'. The H1 assessment has been updated to include the assessment of the substances at the LOD. Where substances relevant to the operations at the site were analysed as being below the LOD, the LOD was input as the release concentration in the

	assessment to assess the potential impact on environmental receptors. Section 10 of the Permit Variation Application Report has been updated to include the outcome of the H1. In view of the information provided in attachment to this Letter Report and the updated Permit Variation Application Report, these aspects are considered closed.
7. Technical Competence Please confirm if Simon Gomm provides technical competence for any other sites (including non-Angus Fire Limited sites). Please demonstrate that the WAMITAB Level 4 Medium Risk Operator Competence for Contaminated Land Remediation is most appropriate for the nature of the activities to be carried out in the proposed Angus Fire Limited waste operation.	The CV for Simon Gomm has been provided in attachment to this Letter Report (Attachment 3). Simon is not currently providing support for any other sites. Section 7.3 has been added to the Permit Variation Application Report to demonstrate that the WAMITAB Level 4 Medium Risk Operator Competence for Contaminated Land Remediation is appropriate for the nature of the activities to be carried out in the proposed Angus Fire Limited waste operation. In view of the information provided in attachment to this Letter Report and the updated Permit Variation Application Report, these aspects are considered closed.
8. Site Condition Report For the new processes and new chemicals being introduced by application, EPR/XP3832NV/V004, please: - Identify relevant hazardous substances (RHS). - Submit a Stage 1 – 3 assessment (Communication from the Commission — European Commission Guidance concerning baseline reports under Article 22(2) of Directive 2010/75/EU on industrial emissions). - - Where this identifies a risk to soil and/or groundwater, establish baseline reference data	The Stage 1-3 Assessment prepared for the Site has been updated to include consideration of the new chemicals being introduced by the new treatment process as part of the permit application. A copy of the updated Stage 1-3 Assessment is provided in Appendix 6. In view of the information provided in the updated Stage 1-3 Assessment, these aspects are considered closed.
9. Summary of Environmental Management System (EMS). Please submit a summary of your environmental management system, updated to include control of the new effluent treatment processes and operations.	Section 7.2 has been added to the Permit Variation Application Report to provide a summary of the EMS. This includes the key components of the EMS that have been updated to incorporate control of the new effluent treatment processes and operations.

	In addition, a summary of the specific processes related to the operation of the new treatment system is provided in Appendix 3. In view of the information provided in the updated Permit Variation Application Report, this aspect is considered closed.
10. Payment of Pre-App charge of £2,850. Please submit evidence to confirm that the enhanced pre-application charges have been paid.	Confirmation of the payment made in respect to EA Invoice 415575 dated 6th June 2025 was provided to the EA.
11. Assessment of potential impact on protected habitats/species. Please include in the application, a list of all protected sites/species which are within the screening distances from the Angus Fire site. Where required, please provide an assessment of potential impact on these protected sites/species from gaseous and aqueous releases from the Angus Fire site.	Section 18.1 and 18.2 have been added to the Permit Variation Application Report to provide an assessment of the potential impact on protected habitats/species. In view of the information in the updated Permit Variation Application Report, these aspects are considered closed.
12.Waste Acceptance and Pre-acceptance procedures Please demonstrate how Angus Fire assesses the PFOS content on incoming contaminated surface water to determine its suitability for the treatment process and how it uses that information to optimise the effluent treatment process	Section 3 and Section 4 of '1620016737 Angus Fire Appropriate Measures Assessment' has been updated to describe the assessment of the appropriate measures taken by the site to determine that the contained stormwater meets the pre-acceptance and acceptance criteria for the new treatment system, as requested by the EA. In view of the information provided in attachment to this Letter Report and the updated Permit Variation Application Report, these aspects are considered closed

We trust that the above information is sufficient to close out the outstanding information requested in the EA's email of 13 June 2025, allowing you to progress with the determination of the variation of the Permit, and we look forward to confirmation that the application is considered to have been duly made.

Yours sincerely,

Lisa Jobling
Managing Consultant
Compliance, Strategy & Transactions UK & Ireland

D +44 7815 648451
M +44 7815 648451
lisa.jobling@ramboll.co.uk