



Permit with introductory note

Drakelands Restoration Limited

Hemerdon Mineral Processing Facility

Hemerdon Mine

Plympton

Devon

PL7 5BW

Permit number

EPR/AP3203ML

Hemerdon Mineral Processing Facility

Permit number EPR/AP3203ML

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

This permit is for the operation of a Mineral Processing Facility. The facility is for the production of tungsten and tin ore concentrates, which are produced from primary base mineral extracted from a separately authorised nearby surface mining/extraction operation (known as Hemerdon Tungsten Mine).

The facility is located on Crownhill Down, at national grid reference (NGR): SX 56952 58992. The town of Plympton is located 3km to the south west of the facility, and the city of Plymouth is approximately 10km to the south west. There are rural residential properties approximately 1km from the permit boundary.

The Hemerdon Mine complex comprises the following operations:

- Hard rock open pit;
- Mineral Processing Facility (MPF); and,
- Mining Waste Facility (MWF) including integral surface water discharges.

There are also several separate water discharges, abstraction and impoundment permits associated with the site as shown in the table below.

This permit is for the MPF only.

Tungsten and tin metal compounds are naturally present with iron oxide deposits within the extracted base mineral material. It is the iron content within the extracted mineral that enables the final stages of separation into tungsten and tin ore concentrates.

Mined mineral extracted from the mining operation is processed in primary and secondary crushing and screening plant (EPR Schedule 2 activity reference S3.5 Part B(a)) to reduce the physical size of the ore material for subsequent processing. All crushing and screening operations take place in enclosed buildings, equipped with bag filter systems to control dust emissions.

The size reduced mineral ore undergoes a series of further physical treatment and separation processes within the process buildings. These operations are progressive water-based suspension separation techniques which include dense media separation and froth flotation.

The physical separation processes produce an ore pre-concentrate for subsequent drying and processing in the reduction kiln stage of the plant (Section 2.1 A(1)(a) – Roasting or sintering metal ore, including sulphide ore, or any mixture of iron ore with or without other minerals). The output from the reduction kiln is subject to further physical separation and drying operations to produce separate tungsten and tin ore concentrates which are then transported away from the site for refining into final metal products at separate off-site facilities.

The dryer plant and reduction kiln utilise diesel or liquified petroleum gas fired combustion processes with the combustion flue gasses being vented via 25m and 30m flue stacks. Emissions from the reduction kiln are treated through a wet scrubber abatement system prior to release to air. Emissions from the pre-concentrate and tin concentrate dryer systems are treated through a bag filter prior to release to air.

The water based physical separation processes for the incoming crushed ore material involves high volumes and circulation flow rates through the various stages of the process (up to 2,200 m³ per hour).

To maintain the process requirements within the various process stages, the facility also includes a waste Water Treatment Plant (WTP) (EPR Schedule 2 activity reference S5.4 A(1)(a)(ii)) that can treat up to 500 m³ per hour of the circulating flow and return the cleaned process water to the system.

The site includes stockpiles of excavated materials, crushed ore and ore sorter rejects. These stockpiles are located on impermeable surfaces with sealed drainage. All surface water discharged off site shall be subject to Environmental Permits EPR/QP3420XX and EPR/JB3209MD. This will include the required monitoring standards and emission limits.

All waste generated at Hemerdon will be transported to the MWF (Permit reference EPR/JB3209MD) for use in the tailings embankment. Material may also be stockpiled for future use as an aggregate. This Permit does not cover the processing of this material for the purpose of use as an aggregate.

Solid wastes and slurries from the MPF will include dense media separation rejects, the water treatment filter cake, and tailings. The tailings are an extractive waste from the fines separation unit, and shall be transported by pipeline to the MWF, with a limit of 13,000 m³ per day. Ore sorter rejects may be transported off site for use as an aggregate.

There are a number of European Designated Sites and Local Wildlife Sites within the relevant screening distances for this activity; the impact on species and habitats has been re-assessed under this application.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/AP3203ML/A001	Duly made 17/09/2021	Application for a mineral processing facility.
Additional information received	01/11/2021	Air quality modelling data.
Additional information received	23/12/2021	Noise modelling data.
Additional information received	11/01/2022	Noise modelling files.
Additional information received	15/03/2022	Low frequency noise assessment.
Additional information received	15/06/2022	Details of Applicant change to Drakelands Restoration Limited.
Additional information received	17/06/2022	Details of Applicant change to Drakelands Restoration Limited.
Additional information received	29/11/2022	Schedule 5 response 1a - Application forms Part A, Part B2, Part B3, Part F1, Air Quality Assessment, BAT Assessment, Emergency Preparedness Response Plan, Environmental Risk Assessment, BS4142 Assessment and site drawings.
Additional information received	01/12/2022	Schedule 5 response 1b - Response letter.
Additional information received	09/12/2022	Noise modelling files.
Additional information received	15/08/2023	Low Frequency Noise Impact Assessment and Noise Management Plan.
Additional information received	21/09/2023	Addendum to BAT Assessment - detailing the buildings for primary and secondary crushing.
Additional information received	25/10/2023	Updated Low Frequency Noise Impact Assessment and Noise Management Plan.
Additional information received	14/11/2023	Information on the low frequency noise assessment.
Additional information received	24/11/2023	Addendum to the low frequency noise impact assessment. Confirmation that active noise control (antiphase speakers) will be used, and the predicted low frequency noise emissions.
Permit determined EPR/AP3203ML	TBC	Permit issued to Drakelands Restoration Limited.

Other permits relating to this installation			
Operator	Activity	Permit number	Date of issue
Drakelands Restoration Limited	Mining Waste Facility Permit	EPR/JB3209MD	09/12/2022
Drakelands Restoration Limited	Smallhanger discharge south tank	EPR/QP3420XX	10/11/2022
Drakelands Restoration Limited	Elford's Pond discharge	EPR/DB3290RH	10/11/2022
Drakelands Restoration Limited	Lougher Mill Impoundment Licence	SW/047/0002/005	29/12/2021
Drakelands Restoration Limited	Lougher Mill Abstraction Licence	SW/047/0002/023	21/02/2023
Drakelands Restoration Limited	Tory Pond Reservoir Impoundment Licence	SW/047/0002/003	29/12/2021
Drakelands Restoration Limited	Tory Pond Abstraction Licence	SW/047/0002/022	21/02/2023
Drakelands Restoration Limited	Dewatering abstraction licence and surface water discharge permit	SW/047/0002/020 EPR/QP3420XX	23/11/2022
Tungsten West Plc	Sewage Treatment – site offices	EPR/WB3893DT	30/03/2022
Drakelands Restoration Limited	Sealed sources – Radioactive Substances Activity	EPR/VB3191DN	07/08/2020

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/AP3203ML

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Drakelands Restoration Limited (“the operator”),

whose registered office is

**Shakespeare Martineau LLP 6th Floor
60 Gracechurch Street
London
EC3V 0HR**

company registration number 11854467

to operate an installation at

**Hemerdon Mineral Processing Facility
Hemerdon Mine
Plympton
Devon
PL7 5BW**

to the extent authorised by and subject to the conditions of this permit.

Name	Date

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
 - (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

2.5 Pre-operational conditions

- 2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.4 have been completed.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
 - (a) point source emissions specified in tables S3.1, S3.2 and S3.3; and
 - (b) ambient air monitoring specified in table S3.4; and
 - (c) noise specified in table S3.5.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
 - (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this

information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity
AR1	S2.1 A(1)(a) - Roasting or sintering metal ore, including sulphide ore, or any mixture of iron ore with or without other minerals	The thermal treatment and chemical reduction of ore pre-concentrate in a rotary reduction kiln using diesel or LPG fuel to produce a reduced mixed ore concentrate.	From receipt of dried ore pre-concentrate, reductant and fuel to the collection of reduced ore concentrate, discharge of kiln flue gases via a cyclone, thermal oxidiser, heat recovery exchanger and alkali scrubber system and transfer of spent scrubber liquor to the waste water treatment plant.
AR2	S5.4 A(1)(a)(ii) - Treatment of non-hazardous waste in a plant with a capacity of more than 50 tonnes per day by physico-chemical treatment	Continuous treatment of process water in a waste water treatment plant by oxidation, coagulation, flocculation and filtering to remove solids and contaminants so that cleaned water can be returned to the process and the de-watered solids made suitable for disposal.	From receipt of contaminated process water and water treatment chemicals to return of cleaned water to the process and removal of dewatered sludge cake from the facility and transported to the Mining Waste Facility (Permit reference EPR/JB3209MD).
AR3	S3.5 Part B (a) - Crushing, grinding or other size reduction of any designated mineral or mineral product.	Crushing and size reduction of base mineral material extracted from the mining operation so that it can be suitably processed in subsequent stages of the ore separation process.	From receipt of 'run of mine' base mineral ore to the transfer of crushed and graded material to subsequent stages of the main mineral separation process.
Directly Associated Activities			
AR4	Dense media separation (DMS)	Aqueous treatment of suspended ore solids according to density by cyclones, screening and gravity separation.	From receipt of crushed ore to transfer to subsequent separation treatment processes and temporary storage and removal of waste material to the mining waste facility (Permit reference EPR/JB3209MD).
AR5	X-Ray transmission ore sorting	X-Ray transmission ore sorting of ore solids to reject barren ore.	From receipt of crushed ore to transfer to subsequent separation treatment processes and temporary storage and removal of reject material to the mining waste facility (Permit reference EPR/JB3209MD) or transferred off site.
AR6	Grinding, Fines and Flotation separation	Aqueous separation processes to produce an enriched ore pre-concentrate for subsequent drying and ore processing in the Reduction Kiln.	From receipt of material from the DMS ore processing stage to production of de-watered ore filter cake for processing in the pre concentrate dryer.
AR7	Pre concentrate dryer	Drying of ore pre concentrate in a rotary dryer utilising heat from by the combustion of diesel or LPG.	Drying of de-watered ore filter cake to emission of dryer flue gas via a bag filter abatement plant.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity and WFD Annex I and II operations	Limits of specified activity
AR8	Magnetic separation	Separation of the tungsten and tin fractions of the reduced ore concentrate produced in the Reduction Kiln utilising the magnetic properties of the magnetite (iron) ore concentrate that contains the tungsten.	Two stage magnetic separation of ore concentrate supplied from the Reduction Kiln to storage of final tungsten ore concentrate and transfer of tin ore concentrate for further processing.
AR9	Ore concentrate separation and final tin concentrate drying	Further separation, concentration and drying of the tin ore concentrate fraction from the reduction kiln in a rotary dryer utilising heat from the combustion of diesel or LPG.	Vacuum filtration and drying of resultant ore concentrate to the discharge of dryer flue gas via a bag filter abatement plant.
AR10	Storage of excavated material and crushed ore	Storage of excavated material and crushed ore pending	From receipt of excavated material or crushed ore, to transfer to subsequent treatment processes. All excavated material and crushed ore shall be stored on an impermeable surface with a sealed drainage system.
AR11	Storage of ore sorter rejects	R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced)	From receipt of ore sorter reject to transfer to the Mining Waste Facility (EPR/JB3209MD) or transferred off site. The material shall be stored on an impermeable surface with a sealed drainage system.
AR12	Raw material storage	Storage of raw materials including lubrication oil, antifreeze, diesel.	From the receipt of raw materials to despatch for use within the facility.
AR13	Surface water collection and storage	Collection and storage of roof and site surface water in attenuation ponds.	From the collection of roof and site surface water to re-use within the facility or discharge off-site through the surface water discharge permitted activity EPR/QP3420XX or EPR/JB3209MD.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/JB3209MD/A001	Waste Management Plan (WMP), SLR Ref: 416.10511.00007, Rev 4, February 2022	03/03/2022
	Water Management Plan (reference: TWL-SS-PL-EN-006.17, Rev 3, dated 28/05/2022).	28/05/2022
Response to Schedule 5 Notice dated 08/02/2022	Schedule 5 1a response letter. Application forms Part B2 and Part B3, and the referenced supporting documents within the forms. The operational techniques stated within the Air Quality Assessment (reference: Air Emissions Risk Assessment,	29/11/2022

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<p>dated November 2022).</p> <p>The Best Available Techniques Assessment (reference: Best Available Techniques and Operating Techniques, dated November 2022) and referenced supporting documents and plans within the assessment.</p> <p>Emergency Preparedness Response Plan (reference: TW-PLN-2800-515-001 Emergency Preparedness and Response Plan, dated May 2022).</p> <p>The operating techniques stated within the Environmental Risk Assessment (reference: Environmental Risk Assessment, dated November 2022).</p> <p>The operating techniques stated within the audible noise BS4142 Assessment and referenced site drawings (reference: Noise Impact Assessment, dated November 2022).</p>	
Additional information	Addendum to BAT - detailing the buildings for primary and secondary crushing (reference: Hemerdon Mine Noise Impact Assessment, dated September 2023).	21/09/2023
Response to Schedule 5 Notice dated 05/10/2023	<p>The operating techniques stated within the Low Frequency Noise Impact Assessment (reference: Hemerdon Mine Noise Impact Assessment, dated October 2023).</p> <p>The Noise Management Plan (reference: Hemerdon Mine Noise Management Plan for Minerals Processing Facility, dated October 2023), excluding the Tables 4-6 and 4-7.</p>	25/10/2023
Response to request for information dated 09/11/2023	<p>The operating techniques stated within the 'Further Questions Response Document' (reference: SPC0124/Sch 5 Further Questions/TWL November 2023).</p> <p>Proposal for Verification Testing for Mineral Processing Facility V2.0 (dated: November 2023). This document will be subject to future change following permit issue, in accordance with pre-operational condition PO2 (Table S1.4 of the permit).</p>	14/11/2023
Response to request for information dated 23/11/2023	<p>Email response titled 'Response to Environment Agency Questions 23 November' stating the use of Active Noise Control.</p> <p>Updated Table 6-3 of the Noise Impact Assessment (reference: Hemerdon Mine Noise Impact Assessment, dated October 2023).</p>	24/11/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>The Operator shall carry out an assessment of the impact of emissions to air to verify the assumptions made in the Application. The assessment shall include all pollutants subject to emission limit values.</p> <p>A report on the assessment shall be made to the Environment Agency. Emissions monitoring data obtained during the first year of operation shall be used to compare the actual emissions with those assumed in the impact assessment submitted with the Application. An</p>	<p>Within 15 months from the completion of commissioning, or otherwise agreed by the Environment Agency.</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>assessment shall be made of the impact of each pollutant against the relevant Environmental Standard.</p> <p>In the event that the assessment shows that an environmental standard can be exceeded, the report shall include proposals for further investigative work.</p>	
IC2	<p>The Operator shall submit a report which reviews the effectiveness of the Dust and Emissions Management Plan. The report shall include:</p> <ul style="list-style-type: none"> • A review of the dust monitoring results obtained during the first year of operation. • A review of any complaints received, and how these were addressed. • A review of the effectiveness of the Dust Management Plan. • A summary of any required additional improvements for effective dust management, including set timescales for the implementation of any required improvements. <p>The report shall be submitted to the Environment Agency in writing for approval.</p>	<p>Within 15 months from the completion of commissioning, or otherwise agreed by the Environment Agency.</p>
IC3	<p>The Operator shall undertake a noise assessment during normal operations in accordance with the procedures given in BS4142:2014 (Rating industrial noise affecting mixed residential and industrial areas) and BS7445: 2003 (Description and measurement of environmental noise) or other methodology as agreed with the Environment Agency. The assessment shall include, but not be limited to:</p> <ul style="list-style-type: none"> • A review of the noise sources from the facility. Where any noise source(s) are identified as exhibiting tonal contributions, they shall be quantified by means of frequency analysis. • A review of noise levels from static plant. • Considerations of on-site vehicle movements. <p>A report shall be provided to the Environment Agency for approval, detailing the findings of the assessment.</p> <p>Should the BS4142:2014 assessment conclude that emissions from the permitted activities are above the predicted ratings levels stated in the Application, the operator shall detail in the report any improvements necessary to ensure that emissions are reduced to an acceptable level.</p> <p>Where the report identifies additional mitigation is required the Operator shall submit proposals for implementing improvements, including timescales for implementation, and further monitoring, to be approved in writing by the Environment Agency.</p>	<p>Within 12 months from the completion of commissioning, or otherwise agreed by the Environment Agency.</p>
IC4	<p>The Operator shall conduct a review of low frequency noise emissions from the Installation using emissions monitoring data obtained during full operation of the site.</p> <p>The monitoring schedule shall be designed to provide data representative of typical and worst-case operating conditions. A reasoned 'worst case' is to be agreed with the Environment Agency before monitoring commences.</p> <p>The Operator shall submit a written report to the Environment Agency detailing the monitoring undertaken, the results obtained, and a comparison with the assessment provided within the application.</p>	<p>Within 6 months from the completion of ore commissioning, or otherwise agreed by the Environment Agency.</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>If the monitored emissions exceed those in the Application (Table 6.3, levels stated for Mitigation D, attached to email titled 'Response to Environment Agency Questions 23 November', dated: 24/11/2023), the operator shall submit proposals for implementing improvements, including timescales for implementation, and testing for success to ensure that emissions of low frequency noise are reduced to those stated in the Application.</p> <p>Any improvements shall be implemented in accordance with the Environment Agency's written approval.</p>	
IC5	<p>The Operator shall submit a report which reviews the effectiveness of the Noise Management Plan, for preventing, or where that is not practicable, minimising emissions of noise. The report shall include:</p> <ul style="list-style-type: none"> • A review of the noise monitoring results obtained during full operation. • A review of any complaints received, and how these were addressed. • A review of the effectiveness of the Noise Management Plan. • A summary of any additional measures for effective noise management identified as a result of the review, including set timescales for the implementation of any required improvements. <p>The report shall be submitted to the Environment Agency in writing for approval.</p>	<p>Within 12 months from the completion of ore commissioning, or otherwise agreed by the Environment Agency.</p>

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO1	<p>Prior to commissioning of the installation, the operator shall submit a written copy of the final site Environmental Management System (EMS) and make available for inspection all documents and procedures which form part of the site EMS.</p> <p>The EMS shall cover all activities at the installation and shall be in accordance with the Environment Agency Guidance – How to develop a management system: environmental permits and the Ferrous Metals Processing Industries BREF. The EMS shall include the techniques the operator relies upon to manage the operation, accidents, closure and decommissioning of the site. The documents and procedures set out in the EMS shall form the written management system referenced in condition 1.1.1 (a) of the permit.</p>
PO2	<p>Prior to the commencement of ore commissioning as defined in the 'verification plan', included in Operating Techniques Table S1.2, the Operator shall provide a written commissioning plan, including timelines for completion, for approval by the Environment Agency. The commissioning plan shall include the expected durations of commissioning activities and the actions to be taken to protect the environment during commissioning.</p> <p>The commissioning plan shall include the expected emissions to the environment during the different stages of commissioning, the expected durations of commissioning activities and the measures to be taken to protect the environment and report to the Environment Agency in the event that actual emissions exceed expected emissions.</p> <p>The commissioning plan shall include the method of verification testing for low frequency noise emitting plant, to be agreed with the Environment Agency.</p> <p>Commissioning shall be carried out in accordance with the commissioning plan as approved.</p>
PO3	<p>Prior to the completion of the ore commissioning as defined in the 'verification plan', included in Operating Techniques Table S1.2, the Operator shall carry out verification</p>

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
	<p>testing for low frequency noise emitting plant. This shall be completed in accordance with the agreed commissioning plan (as required in PO2).</p> <p>The Operator shall submit a written report, and obtain the Environment Agency's written approval to it, detailing the verification process and the environmental performance of the plant against the predicted noise levels stated in the permit Application for low frequency noise emissions (Table 6.3, levels stated for Mitigation D, attached to email titled 'Response to Environment Agency Questions 23 November', dated: 24/11/2023).</p>
PO4	<p>Prior to the commencement of commissioning, the Operator shall provide a standalone Dust and Emissions Management Plan to the Environment Agency for written approval.</p> <p>This shall include:</p> <ul style="list-style-type: none"> • all dust management operating techniques submitted with the Application; and • any dust management operating techniques and monitoring requirements submitted within the Application for the Mining Waste Facility (EPR/JB3209MD/A001), where relevant to the Mineral Processing Facility.
PO5	<p>The Operator shall submit a report, and obtain the Environment Agency's written approval to it, on the baseline conditions of soil and groundwater at the installation, for the whole permitted site boundary (as shown in Schedule 7). The report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for in Article 22(3) of the IED.</p> <p>The report shall contain information, supplementary to that already provided in application Site Condition Report, needed to meet the information requirements of Article 22(2) of the IED.</p>
PO6	<p>The operator shall ensure that a review of the design, method of construction and integrity of the proposed site secondary containment is carried out by a competent person (qualified civil or structural engineer).</p> <p>The review shall be undertaken in accordance with the methodology detailed in CIRIA C736 - Containment Systems for the Prevention of Pollution - secondary, tertiary and other measures for industrial and commercial premises or other relevant industry standard and shall compare the constructed secondary containment against the standards stated above.</p> <p>The review shall include:</p> <ul style="list-style-type: none"> • physical condition of the constructed secondary containment; • any work required to ensure compliance with the standards detailed in CIRIA C736 or other relevant industry standard; and • a maintenance and inspection regime. <p>A written report of the review shall be submitted to the Environment Agency detailing the review's findings and recommendations.</p> <p>Remedial action shall be taken to ensure that the secondary containment meets the CIRIA C736 standards and the operator must implement the maintenance and inspection regime.</p>
PO7	<p>The operator shall submit a written 'primary containment report' and shall obtain the Environment Agency's written approval to it.</p> <p>The report shall contain the results of an inspection and program of works undertaken by a qualified engineer, and shall assess the extent design specification and condition of primary containment systems where polluting liquids and solids are being stored, treated, and/or handled.</p> <p>The report shall include:</p> <ul style="list-style-type: none"> • an assessment of the physical condition of all primary containment systems (storage and treatment vessels) using a Written Scheme of Examination; • a program of works with timescales for the implementation of individual improvement measures necessary to demonstrate that the primary containment is fit for purpose or alternative appropriate measures to ensure all polluting materials will be contained on

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
	site; and, <ul style="list-style-type: none"> • a maintenance and inspection regime.
PO8	The Operator shall supply a written report to the Environment Agency that includes an 'as installed' site drainage plan, and shall obtain the Environment Agency's written approval to it.
PO9	The Operator shall supply an updated Waste Management Plan that includes the solid filter cake waste from the waste water treatment plant, and shall obtain the Environment Agency's written approval to it.

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Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Diesel fuel for reduction kiln and ore drying plant	Less than 0.1% sulphur content

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Schedule 3 – Emissions and monitoring

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on site plan in schedule 7]	Exhaust from ore pre-concentrate dryer bag filter plant	Particulate	50 mg/m ³	Periodic over minimum 1-hour period	Annual	BS EN 13284-1
	Exhaust from ore pre-concentrate dryer bag filter plant	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No Limit Set	Periodic over minimum 1-hour period	Annual	BS EN 14792
	Exhaust from ore pre-concentrate dryer bag filter plant	Sulphur dioxide	No Limit Set	-	No monitoring requirement	-
A2 [Point A2 on site plan in schedule 7]	Exhaust from Reduction Kiln abatement scrubber	Particulate	5 mg/m ³	Periodic over minimum 1-hour period	Quarterly in the first year. Then Annually	BS EN 13284-1
	Exhaust from Reduction Kiln abatement scrubber	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No Limit Set	Periodic over minimum 1-hour period	Annual	BS EN 14792
	Exhaust from Reduction Kiln abatement scrubber	Sulphur dioxide	No Limit Set	-	No monitoring requirement	-
	Exhaust from Reduction Kiln abatement scrubber	Arsenic	1 mg/m ³	Periodic over minimum 1-hour period	Quarterly in the first year. Then Annually	BS EN 14385
A3 [Point A3 on site plan in schedule 7]	Exhaust from tin concentrate dryer bag filter plant	Particulate	50 mg/m ³	Periodic over minimum 1-hour period	Quarterly in the first year. Then Annually	BS EN 13284-1
	Exhaust from tin concentrate	Oxides of Nitrogen (NO and	No Limit Set	Periodic over minimum 1-	Annual	BS EN 14792

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
	dryer bag filter plant	NO ₂ expressed as NO ₂)		hour period		
	Exhaust from tin concentrate dryer bag filter plant	Sulphur dioxide	No Limit Set	-	No monitoring requirement	-
A4 [Point A4 on site plan in schedule 7]	Exhaust from primary crusher plant bag filter system	Particulate	50 mg/m ³	Periodic over minimum 1-hour period	Quarterly in the first year. Then Annually	BS EN 13284-1
A5 [Point A5 on site plan in schedule 7]	Exhaust from secondary crusher plant bag filter system	Particulate	50 mg/m ³	Periodic over minimum 1-hour period	Quarterly in the first year. Then Annually	BS EN 13284-1

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 – as shown on site plan in Schedule 7 emission to Smallhanger Brook [Note 1]	Site surface water via oil interceptor and attenuation ponds	No parameters set	No Limit Set	-	-	-
W2 – as shown on site plan in Schedule 7 emission to Tory Brook [Note 2]	Site surface water	No parameters set	No Limit Set	-	-	-

[Note 1] – discharge will be subject to requirements of environmental permit EPR/QP3420XX.
 [Note 2] – discharge will be subject to requirements of environmental permit EPR/JB3209MD.

Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
D1 – as shown on site plan in schedule 7 emission via	From fines separation unit of the ore processing	Volume	13,000 m ³ per day	Aggregated daily volume	Continuous	MCERTS self-monitoring of effluent flow

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site–emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
pipeline to Mining Waste Facility [Note 1]	plant					scheme
[Note 1] - discharge will be subject to requirements of environmental permit EPR/JB3209MD.						

Table S3.4 Ambient air monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
In accordance with the Dust and Emission Management Plan [Note 1]	PM ₁₀	Continuous	Monitoring methods, trigger levels and actions as specified in approved Dust and Emission Management Plan [Note 1].	
	Deposited particulate matter	Continuous		
	Visual dust checks	Daily		
[Note 1] - dust monitoring to be agreed on completion of PO4 as approved in writing by the Environment Agency.				

Table S3.5 Noise monitoring requirements				
Location or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
In accordance with the Noise Management Plan (referenced in Table S1.2 of the permit).	Noise	Annually	Monitoring methods as specified in approved Noise Management Plan (referenced in Table S1.2 of the permit).	

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1.	A1, A2, A3, A4, A5	Quarterly in the first year of operation, then annually	01 January, 01 April, 01 July, 01 October
Ambient air monitoring Parameters as required by condition 3.5 and Table S3.4.	In accordance with the Dust and Emission Management Plan ^[Note 1]	Every 12 months	01 January
Noise monitoring Parameters as required by condition 3.5 and Table S3.5.	In accordance with the Noise Management Plan (referenced in Table S1.2 of the permit).	Every 12 months	01 January

[Note 1] - dust monitoring to be agreed on completion of PO4 as approved in writing by the Environment Agency.

Table S4.2: Annual production/treatment	
Parameter	Units
Total extracted base mineral processed through Primary Crusher Plant	tonnes
Total ore pre-concentrate processed through Reduction Kiln	tonnes
Total process water treated through Water Treatment Plant	m ³
Total 'Tailings' discharge to MWF	m ³
Total coarse rejects deposited to MWF	tonnes
Total coarse rejects transferred off site	tonnes
Total Water Treatment Plant 'filter cake' sent for disposal	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Total volume make-up water imported	Monthly	m ³
Electrical energy usage	Quarterly	MWh
Diesel or LPG usage for kiln and dryers	Quarterly	litres
Total replacement water usage per tonne of concentrate processed through Kiln	Quarterly	m ³ /tonne
Total electrical energy usage per tonne of concentrate processed through Kiln	Quarterly	MWh/tonne
Total diesel or LPG usage per tonne of concentrate processed through Kiln	Quarterly	litres/tonne

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	TBC
Ambient air monitoring	Ambient Air Monitoring Form, or other form as agreed in writing by the Environment Agency	TBC
Noise monitoring	Noise Monitoring Form, or other form as agreed in writing by the Environment Agency	TBC
Process monitoring	Process Monitoring Form, or other form as agreed in writing by the Environment Agency	TBC
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	TBC
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	TBC
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	TBC

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Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

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Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“disposal” means any of the operations provided for in Annex I to the Waste Framework Directive.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission or background concentration limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface, and should be read in conjunction with the term ‘sealed drainage system’.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to the Waste Framework Directive.

“sealed drainage system” in relation to an impermeable surface means a drainage system with impermeable components which does not leak and which will ensure that:

- a. no liquid will run off the surface otherwise than through the system
- b. except where they may lawfully be discharged, all liquids entering the system are collected in a sealed sump

“waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

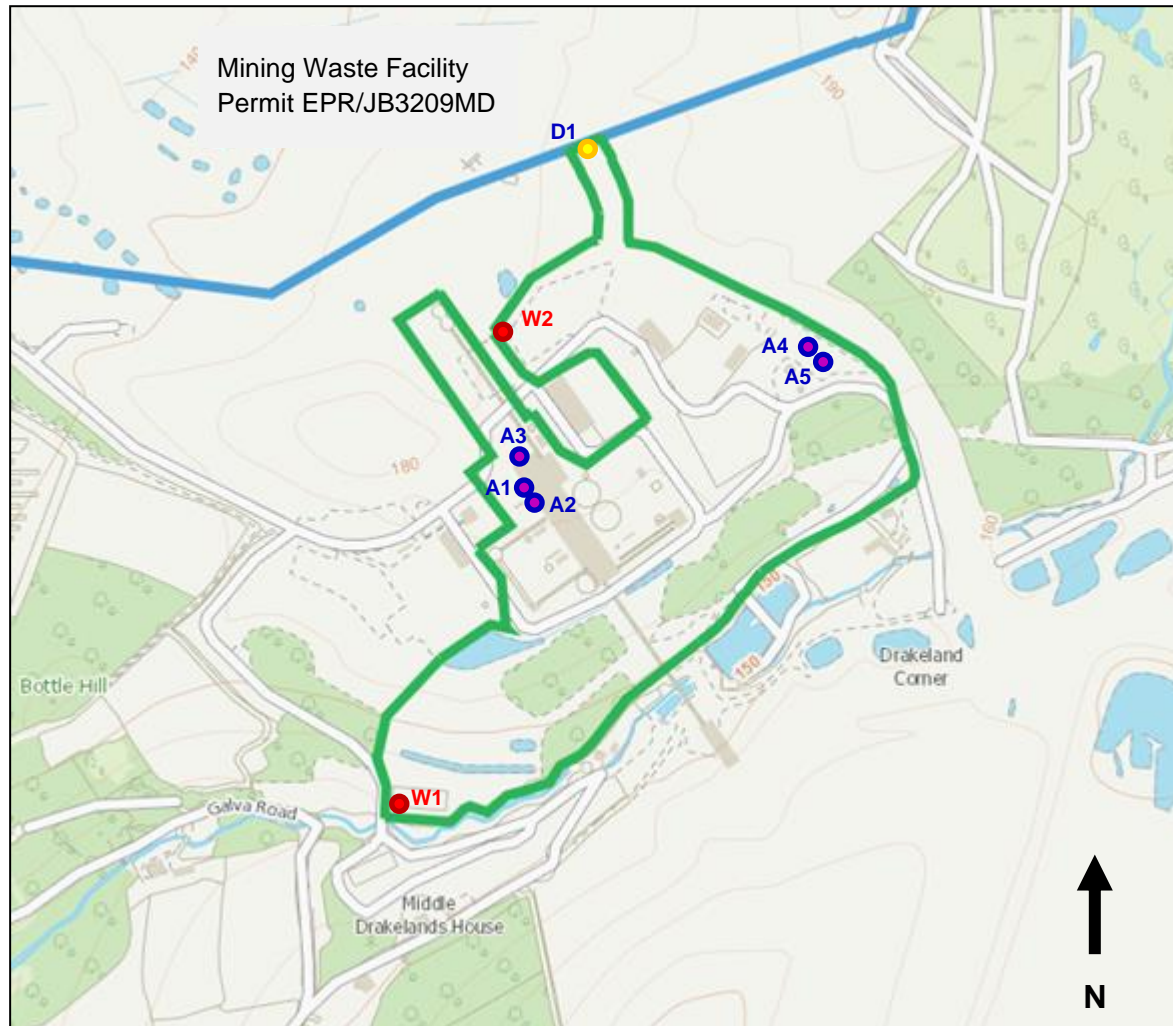
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

In relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content “year” means calendar year ending 31 December.

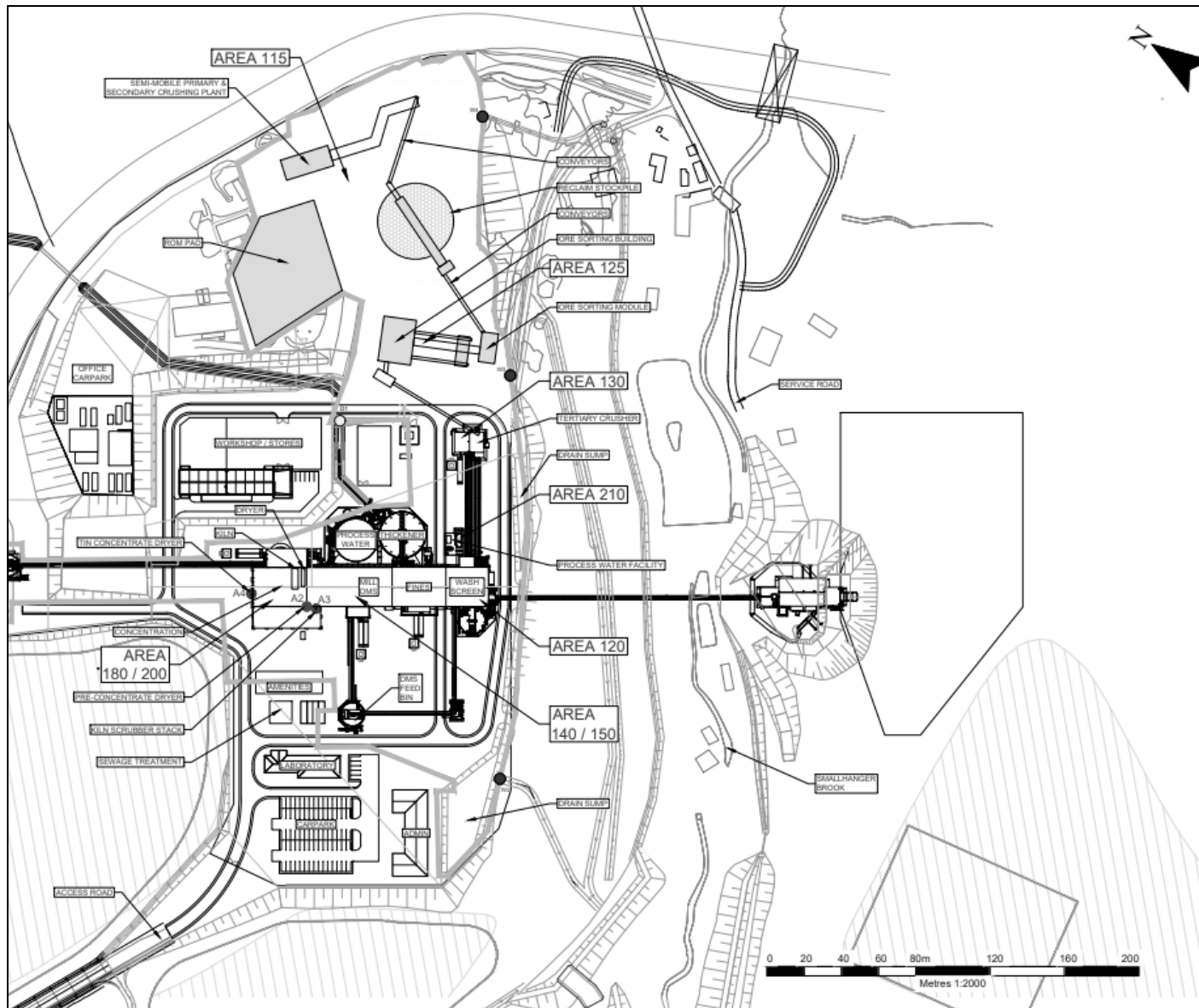
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Schedule 7 – Site plan

Site Boundary



Site Layout



END OF PERMIT