

**Application reference: EPR/YP3234XR/V009**

**Operator: AUGEAN TREATMENT LIMITED**

**Facility: Port Clarence Landfill Site - EPR/YP3234XR, off Huntsman Drive, Stockton on Tees, TS2 1UE**

The following is to confirm my phone message of 12/01/2026.

Unfortunately, the application payment you sent is incorrect. Your application is for new activities to be added to an existing permit, so the reductions for a new bespoke permit do not apply.

We also identify two 5.3(a)(ii) activities with treatment of APCr and treatment of effluent to remove heavy metals.

The correct application charge is £58,964. This leaves a balance of £37,296.80 to pay.

| Charge ref | Section    | Description  | Charge  |
|------------|------------|--|---------|
| 1.16.1.2   | 5.3(a)(ii) | Hazardous waste installation physico chem treatment: APCr                | £16001  |
| 1.16.1.2   | 5.3(a)(ii) | Hazardous waste installation physico chem treatment: metal precipitation | £16001  |
| 1.16.4     | 5.6        | Temporary or underground storage of hazardous waste                      | £13,519 |
| 1.16.2.2   | 5.4(a)(ii) | Non hazardous waste installation physico chemical treatment for disposal | £13,443 |

[Environmental permits and abstraction licences: tables of charges - GOV.UK](#)

[Environmental permits: when and how you are charged - GOV.UK](#)

Upon review we confirm that the proposed activities in the table are correct. In determining the application fee, we referred to your guidance ([Environmental permits: when and how you are charged - GOV.UK](#)) for which Section 3.7 states that “the charge reductions that apply to multiple activities for new permits do not apply to variations”. However, Section 3.8 states that “If you want to add an activity to your permit, you must

pay the charge for a new permit application for that type of activity”. We interpreted this therefore as that the discount would apply as it does for a new application.

Section 3.7 also states that “if the sum of the variation charges is more than the cost of a new multi-activity permit, the EA will consider whether to use an ‘abatement decision’ to refund some of the charges so that the cost does not exceed that of a new multi-activity permit”. Please can we therefore ask you to consider an abatement decision to waive or reduce the charge as per Section 7.4 of your charging guidance. We consider that an application fee of £58,964 to add the new proposed activities to the existing permit is disproportionate compared to the costs that will be incurred to determine the application. For example, at the Environment Agency’s enhanced pre-application charge rate of £100 per hour this would equate to ~590 hours or 79 days of time. Whilst we acknowledge that the application will require time for its determination, we consider this fee disproportionate given the number and type of activities being applied for and the fact that the application is of low environmental risk.

We need to ask you for some missing information before we can do any more work on your application. Please provide us with more information to question/the following questions

We need to know

#### **Form A**

1: Revise Form A to provided contact for official documents as 7.2 directs

*Question 7.2 has been completed for yourself, but you are not listed as a company director, clerk or secretary and we do not have a letter of authorisation in place for you from Augean.*

Please find attached updated Form A (*Part\_A\_Augean*) with details of the company secretary included in section 7.2.

#### **Form C2**

2: Provide site map for lamella clarifier

*We are unable when zooming into the large site map to read and understand the labelled infrastructure in this area.*

Please find attached updated site plan (*AUG.25.302.AWP.GA Version 4.4 22 12 2025*). The Lamella Clarifier is included on this plan. There have been some minor amendments to the layout since the application was submitted for operational reasons, these are reflected in the updated site plan attached.

3: Provide NGR’s for all emission points within this application

*We do not have the NGR's for emission points such as the pressure relief vents on the APCr storage silos*

*NGRs are included on the updated site plan (AUG.25.302.AWP.GA Version 4.4 22 12 2025).*

4: Revise Environmental Risk Assessment to screen 2km and 10km for relevant ecological designations.

*Your ERA screens for 5km not 10km distance and therefore is missing ecological designations from your risk assessment.*

*Please find attached a report (Additional Information Required for Duly Making - ERA Screen update 002) which outlines the additional ecological designations which have been reviewed against the environmental risk assessment. The same conclusion is drawn in that there is minimal risk to the environment from the proposed activities which are the subject of the variation application.*

### **Form C3**

5: Provide EWC codes required for each activity you have applied for

*We understand you already accept APCr but the application does require the EWC codes for each of the three activities you have applied for.*

*EWC codes are included in Appendix 5 of the application.*

6: Provide detail on your secondary containment, tanks specifications and site surfacing.

*Containment, bunding, enclosed or covered infrastructure needs to be clearly identified on a site layout map. Section 4 of your application does not provide any spill modelling, specifications, calculations or containment design to demonstrate the 25%/ 110% rule is achieved.*

*Please find attached document (Tank Farm Bund and Pad Kerb Calculation (V2) showing the containment and bunding calculations for the site demonstrating how the 25%/110% rule is achieved.*

The site will have a concrete surface on all operational areas.

7: Describe why abatement techniques are suitable

*The application advises of reverse jet bag filters to be attached to the four pressure relief vents in the silos. Advise how you know this is the best technique for abating the emission.*

*The selection of this technique is based upon Augean's significant technical expertise and practical industry experience, including the previous use of the technique at a*

similar facility. The deployment of this technique at the site was successfully implemented and resulted in no emissions to the environment and ensured smooth operations at the site.

In addition, this technique is referenced within the Waste Treatment BAT Conclusions as reference literature (Plant 498). This was for installations that involve the washing of flue gas treatment residues and their use as a raw material for production of construction products. The reverse jet filters are referred to in the process description where flue gas residues are being delivered by road tanker and transferred to a powder storage silo. This reference literature refers to two facilities within the UK using this process. Therefore, this technique is considered appropriate for the application as it provides effective environmental protection, is cost effective and ensures efficient site operations.

Please reply directly to this email with your information and copy in [naomi.daniel01@environment-agency.gov.uk](mailto:naomi.daniel01@environment-agency.gov.uk).

You must send us the information and or payment by 26/01/2026.