

From: [REDACTED]
To: [SM-Defra-RESP-notifications \(DEFRA\)](#)
Cc: [REDACTED]
Subject: RE: EPR/PP3322LR/A001 We Need More Information About Your Application CRM:0269064
Date: 07 August 2026 14:32:24
Attachments: [image001.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
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[image012.png](#)
[image013.png](#)
[image014.png](#)
[image003.png](#)
[image005.png](#)
[Watercycle_16635A-10-R02-02-F.pdf](#)

Hi Katie

Further to my email yesterday, as we did already hold modelled Li and Co data (just not reported) and in the interests of moving things forward by providing a quantitative assessment, we have compared process contributions of lithium and cobalt across screening criteria derived from authoritative health based guideline values in other jurisdictions, including recently published Minimum Risk Levels (MRLs) derived by the ATSDR and Toxicity Reference Values (TRVs) recently derived by ANSES.

Whilst these are not EALs, and the methodology and uncertainty factors may not necessarily correspond exactly to the Environment Agency's methodology for deriving tolerable concentrations in air, they are nonetheless derived by authoritative bodies after reviewing the toxicological evidence base and adopt the same methodological approach of deriving the health-based guideline values through selection of appropriate points of departure and application of uncertainty factors. As such, we consider these to be robust initial screening criteria in the absence of specified EALs from the Environment Agency.

The MRL and TRV are appropriate for chronic (annual mean) exposure, so we have attempted to provide an initial screening level assessment of short-term impacts through comparison with appropriate metal proxies for which short-term EALs are established. The rationale and justification for the screening criteria are provided in Appendix A3 of the attached updated AQA.

Based on these metrics, process contributions of lithium and cobalt are comfortably below 1% of the long-term criteria (both are less than 0.1%) and 10% of the short-term criteria at the receptor experiencing the maximum impact, so screen as insignificant.

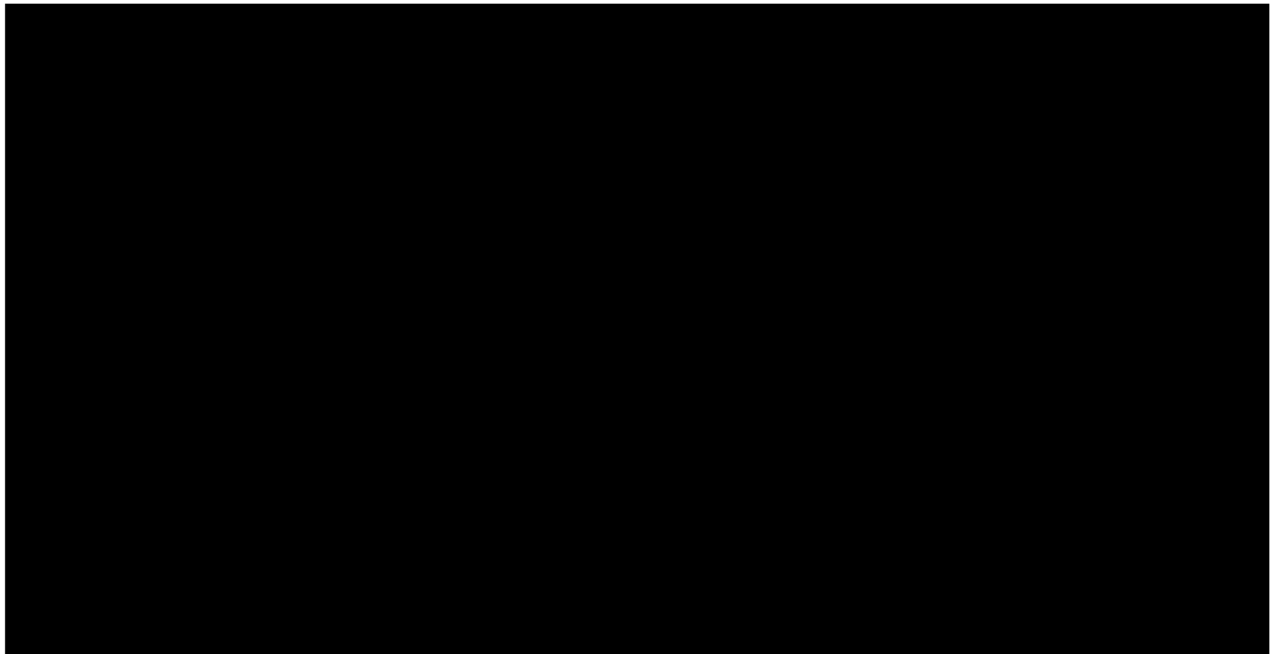
Per my other email, we would propose that formal derivation of an EAL is included by way of improvement condition alongside a requirement to update the AQA with actual emissions performance levels.

The updated AQA report is attached. Due to issues in the past with firewalls removing model input files from emails, the input files can be downloaded from the folder below:

 [Watercycle ADMS input files](#)

Should you have any issues accessing the files, or require further information, please do not hesitate to contact me.

Best regards



From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>

Sent: 06 August 2026 13:52

To: 

Cc: 

Subject: EPR/PP3322LR/A001 We Need More Information About Your Application CRM:0269064

Dear Adam,

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/PP3322LR/A001

Operator: Watercycle Technologies Limited

Facility: Watercycle Minerals Recovery Plant, The Heath Business Park, Runcorn, WA7 4QX

Thank you for your application received on 18/06/2026.

We need to ask you for some missing information before we can do any more work on your application. The following additional information is required:

- Explain why lithium and cobalt have not been assessed to the same level of detail as other metallic pollutants identified within the application. Lithium and Cobalt are reasonably expected to be present within black mass, and the application acknowledges this however both substances have been omitted from the Air Quality Assessment (AQA) and dispersion modelling.

You must provide a detailed justification for their exclusion, including the screening methodology and criteria applied. Evidence Lithium and cobalt from the installation would not result in significant impacts on human health or ecological receptors. Please note: we would consider Air Quality Assessment and dispersion modelling the most relevant and reliable way to evidence this and as such are likely to require a revision of the AQA. If so the application will be returned to allow for this.

- Air Quality modelling Files. Required to run our own checks

Please reply directly to this email with your information and copy in [REDACTED]

Postal address:
Integrated Permitting Services
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

You must send us the information by 13/08/2026

If we do not receive this by this deadline we will return your application.

If we receive what is missing by the deadline, we will continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by email whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application. This maximum amount we'll retain is capped at £1,673.78. Further information on charging can be found at: [The Environment Agency Environmental Permitting and Abstraction Licenceing England Charging Scheme 2022 Amendments up to 15 May 2026](#)

You can send us this determination information by replying directly to this email with your information and copy in [REDACTED]

Without this additional information we will be unable to issue your permit.

Note: Our email system has a file size limit of 25MB, if your returns exceed this limit you will have to arrange an online file transfer. Please ensure the file transfer link does not have a time limit on it.

If you have any questions please phone me on [REDACTED] or email [REDACTED]

Yours sincerely,

