

Submitted to LA2 7NA, Angus Fire Limited, EPR/XP3832NV/V004: environmental permit consultation
Submitted on 2025-08-20 16:04:50

Seeking your views

1 Please tell us if you are responding as an individual or on behalf of an organisation or group.

On behalf of an organisation or group

Name of Individual, Organisation or Group:
Cleaner Bentham Limited

Other:

2 What is your email address?

What is your email address? :
info@Cleaner-Bentham.co.uk

3 Can we publish your response? We will not publish any personal information or parts of your response that will reveal your identity.

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4 Please provide your comments on the environmental permit application received from Angus Fire Limited

Please provide your comments on the environmental permit application received from Company Name:

Formal Consultation Submission to the Environment Agency
RE: Angus Fire Ltd – Application to Vary Environmental Permit (Bentham Site)
Date: 20th August 2025
Submitted by: Cleaner Bentham Limited
Reference: Angus Fire Ltd, Permit Variation Consultation (EPR/VP3139LS/V005)

Summary Position

This submission opposes the immediate imposition of a PFAS treatment train as a condition of Angus Fire's permit variation. The proposal is premature, given the absence of PFAS-specific sampling data, concerns about historic non-compliance, and the technical and economic complexity of treatment train systems. There is also no data on any solvents utilised in the procedure.

Before considering such a requirement, we urge the Environment Agency to prioritise full site characterisation, transparency of results, and accountability for past failures.

1. Lack of PFAS-Specific Data

A fundamental concern is that neither Angus Fire nor the Environment Agency has published comprehensive, site-specific PFAS sampling data—including concentrations in soil, groundwater, lagoon water, rainwater runoff, Aquifer or boreholes.

Without baseline data:

- The design and scale of any remediation system remains speculative.
- There is no independent scientific basis to assess treatment effectiveness or whether it stops further environmental risk.

Angus Fire has not provided Sampling results submitted to this Permit Variation, the lab reports attached to the EA consultation are void of any PFAS results from either groundwater or from the Treatment Train. There can be know comparison made to before and after treatment.

Recommendation:

Require Angus Fire to conduct and publish a full PFAS site assessment (covering legacy and emerging PFAS) before evaluating any treatment solution.

2. Inappropriateness of Mandating a Treatment Train Without Evidence

A "treatment train" involves integrating multiple advanced technologies such as nanofiltration, electrochemical oxidation, and electro-Fenton degradation. However, as detailed in the peer-reviewed article "Treatment train approaches for the remediation of per- and polyfluoroalkyl substances (PFAS): A critical review" (DOI: 10.1016/j.jhazmat.2019.121963):

- These systems are not commercially proven on legacy PFAS-contaminated sites.
- They are energy- and cost-intensive, often requiring extreme operating conditions.
- Their success depends on detailed knowledge of site-specific PFAS profiles.
- This is only effective on PFAS that current legislation focuses on and offers no potential needed changes of legislation in the near future.
- Treatment trains (TT) like this burn more carbons, increasing the companies carbon footprint and adding to the issues of climate change.
- Does not capture shorter carbon chains.
- This does not monitor the 61 species required to be tested for by the DWI standards. As the Lune is protected drinking water River, and the wening feeds into the Lune, this should be a requirement.
- Our understanding is that the only way to destroy waste (PFAS chains) captured by the TT is HTI. Currently despite evidence that has been provide to the EA, the burning temperature is too low which we know will spread the issue around the HTI site.

Deploying such a system in the absence of PFAS data is not only inefficient—it may create a false sense of remediation progress, while deeper contamination remains unaddressed.

Recommendation:

Do not install or agree to the use of a PFAS treatment train until sufficient site data is available to determine its feasibility and effectiveness and the ability to destroy PFAS are environmentally friendly and they are able to destroy the 61 Species the DWI recommends to test for.

3. Longstanding Issues with Compliance and Transparency

Public confidence in Angus Fire's environmental practices is low. According to publicly available reports, including those collated by Cleaner Bentham, Angus Fire has:

- Breached its permit at least 23 times in the past decade, including unauthorized discharges and lagoon failures.
- Failed to share sampling data with local authorities or the public.
- Avoided full participation in public engagement forums.

Given this record, the focus must shift from theoretical solutions to enforcing compliance and ensuring transparency.

Recommendation:

Make any future permit approval conditional on the publication of complete environmental monitoring data (including PFAS), and on the establishment of an independent local oversight mechanism.

4. Focus on Core Remediation Priorities

A treatment train addresses runoff—not the core pollution sources, which include:

- Contaminated lagoons
- Polluted groundwater
- Legacy industrial activities (including historical foam testing)
- Destruction of PFAS contamination by HTI

Without a plan to remediate these primary sources, a treatment train applied to rainwater effluent misses the central risk to human and environmental health.

Recommendation:

Prioritise remediation of soil, groundwater, and lagoon contamination before investing in secondary or peripheral treatment technologies.

5. DWI

We have attached a DWI (Drinking Water Inspectorate) studies show that GAC has poor results on water treatment.

This study was instigated by the Department for Environment and Rural Affairs.

Final Recommendations to the Environment Agency

We respectfully request that the EA:

1. Reject any proposal to impose a PFAS treatment train at this time.
2. Mandate comprehensive PFAS sampling and transparent data publication.
3. Delay permit approval until compliance history, pollution extent, and remediation feasibility are clearly addressed.
4. Ensure independent monitoring and meaningful public engagement moving forward.
5. Find alternative methods of Destruction other than HTI.

Closing Statement

In the interest of scientific integrity, public safety, and environmental justice, decision-making must be based on transparent, complete, and credible data—not unproven technical fixes.

We urge the Environment Agency to uphold its duty of care by demanding full site characterisation and accountability before allowing any further operational changes at Angus Fire's Bentham facility.

Thank you for considering this submission.

Further Reading from DWI:

Bench-scale Water treatment efficacy study of PFAS removal, Review of PFAS prevalence in the UK treatment process alternatives for removal & executive summary.

5 If you have any documents or images to attach to your response, please upload them below

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6 Please tell us how you found out about this consultation:

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