

## Hugill, Connor

---

**From:** Greg Altria <galtria@slrconsulting.com>  
**Sent:** 29 July 2021 07:04  
**To:** Wray, Kate  
**Cc:** Matt Baker; Maria Francis  
**Subject:** RE: Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Kate

The modelled building information can be obtained from the AERMOD modelling files and a figure showing the modelled buildings is included within the report (Figure 3-1). However, for completeness, please find below a table listing the buildings considered within the modelling assessment:

Building Reference	Location (Approximate Centre Grid Reference)	Length (m)	Width (m)	Height (m)	Position of Building Relative to Cooler Emission Source	Approximate Distance of Building to Cooler Emission Source (m)	Position of Building Relative to Boiler Emission Source	Approximate Distance of Building to Boiler Emission Source (m)
BLD_1: P&R Hurt	357691, 117206	29	13	6	North	97	North East	125
BLD_2: MoT Yeovil	357651, 117193	41	12	6	North	82	North	106
BLD_3: Site Office 1	357668, 117156	12	8	3	North	57	North	83
BLD_4: Kuehne	357617, 117180	49	35	11	North West	75	North West	96
BLD_5: Europcar	357619, 117126	24	23	6	North West	53	North West	64
BLD_6: Yeovil Car Magic	357640, 117072	60	29	11	West	29	West	18
BLD_7: Buffalo Trailer	357647, 117005	44	36	10	South West	70	South	43
BLD_8: Oxford Road Building	357710, 116923	30	13	6	South	157	South	132
BLD_9: Site Office 2	357667, 117163	10	3	3	North	69	North	95
BLD_10: Site Office 3	357667, 117167	10	3	3	North	72	North	98
BLD_11: Site Mill	357683, 117091	49	33	5 – 19.5	<b>Both the cooler and boiler emission sources are located on this building</b>			

BLD_12: Site Bulk Storage Building	357663, 117106	15	6	18.8	North West	14	North	32
---	-------------------	----	---	------	---------------	----	-------	----

Many thanks

Greg

**From:** Wray, Kate <kate.wray@environment-agency.gov.uk>

**Sent:** 22 July 2021 11:41

**To:** Greg Altria <galtria@slrconsulting.com>

**Cc:** Matt Baker <matt@duffieldssouthwest.co.uk>; Maria Francis <mfrancis@slrconsulting.com>

**Subject:** RE: Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Greg,

I have completed an initial review of the modelling submitted yesterday. You do not appear to have included details of any buildings in the model input files or within the report itself.

Please provide the location and dimensions of all buildings included in the model, including National Grid reference, height, width and rotation, in accordance with our [guidance](#).

Please submit this information by 29/07/21.

Kind regards

Kate

**Kate Wray**

Permitting Officer – Installations, National Permitting Service

**Environment Agency:** Trentside, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)

External: 02030253297 Internal: 33297

Working days: Tuesday to Thursday



**From:** Greg Altria [<mailto:galtria@slrconsulting.com>]

**Sent:** 21 July 2021 15:11

**To:** Wray, Kate <[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)>

**Cc:** Matt Baker <[matt@duffieldssouthwest.co.uk](mailto:matt@duffieldssouthwest.co.uk)>; Maria Francis <[mfrancis@slrconsulting.com](mailto:mfrancis@slrconsulting.com)>

**Subject:** RE: Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Kate

Please find attached a detailed dispersion modelling assessment including the replacement boiler and emissions from the coolers.

We trust this satisfactorily meets your requirements and look forward to confirmation of this in due course.

Kind regards

Greg

---

**From:** Wray, Kate <[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)>  
**Sent:** 07 July 2021 15:28  
**To:** Greg Altria <[galtria@slrconsulting.com](mailto:galtria@slrconsulting.com)>  
**Subject:** RE: Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Greg,

Further to our earlier telephone conversation, I have now reviewed the revised AQA. This AQA has been based on emissions from the existing boiler. Short term emissions to air of PM10, NO2 and NOX from the site cannot be screened out as insignificant.

It is understood that a replacement boiler, with a lower thermal rated input, is due to be installed at the site over the next couple of weeks. As discussed, you are proposing to re-run the AQA based on emissions from this new boiler. If emissions can't be screened out as insignificant you will need to submit detailed modelling to demonstrate that emissions to air from the site are insignificant, before the application can be duly made. The detailed modelling should include emissions from the new boiler, rather than the existing boiler, which is due to be replaced.

Please submit the detailed modelling by **21/07/21**. If we do not receive the information by this date we will return your application.

If we do receive the requested information we'll 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 letter 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 application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:  
<https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

Please let me know if you have any queries.

Kind regards

Kate

**Kate Wray**  
Permitting Officer – Installations, National Permitting Service  
**Environment Agency:** Trentside, Scarrington Road, West Bridgford, Nottingham, NG2 5FA  
[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)  
External: 02030253297 Internal: 33297

Working days: Tuesday to Thursday



**From:** Greg Altria [<mailto:galtria@slrconsulting.com>]

**Sent:** 01 July 2021 19:42

**To:** Wray, Kate <[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)>

**Cc:** Jackson, Catriona <[catriona.jackson@environment-agency.gov.uk](mailto:catriona.jackson@environment-agency.gov.uk)>; Matt Baker <[matt@duffieldssouthwest.co.uk](mailto:matt@duffieldssouthwest.co.uk)>; Maria Francis <[mfrancis@slrconsulting.com](mailto:mfrancis@slrconsulting.com)>

**Subject:** RE: Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Kate

Please find attached a response to the Environment Agency's questions in your email dated 15<sup>th</sup> June 2021.

We trust the responses are satisfactory and look forward to your confirmation of this in due course. As discussed on the telephone today, we will collate the technical specifications for the replacement boiler and supply these to you at Duffield's earliest opportunity.

Many thanks

Greg

**SLR's response to Coronavirus COVID-19** - In response to the ongoing global pandemic, we are actively following the advice provided by our national and state governments. As a flexible, full-service organisation we are open for business and will continue to operate and deliver advice and services to our clients wherever possible and in line with government guidance.



**Greg Altria**

Principal Consultant - Environment Management, Permitting & Compliance

 +44 117 906 4280

 +44 7787 269604

 [galtria@slrconsulting.com](mailto:galtria@slrconsulting.com)

SLR Consulting Limited

3rd Floor, Brew House, Jacob Street, Bristol, BS2 0EQ



The Prince's Responsible Business Network

Race at Work Charter signatory

Confidentiality Notice and Limitation

This communication, and any attachment(s) contains information which is confidential and may also be legally privileged. It is intended for the exclusive use of the recipient(s) to whom it is addressed. If you are not the intended recipient, any disclosure, copying, distribution or action taken or not taken in reliance on it is prohibited and may be unlawful. If you have received this communication in error, please advise SLR by e-mail and then delete the e-mail from your system. As e-mails and any information sent with them may be intercepted, corrupted and/or delayed, SLR does not accept any liability for any errors or omissions in the message or any attachment howsoever caused after transmission.

Any advice or opinion is provided on the basis that it has been prepared by SLR with reasonable skill, care and diligence, taking account of the manpower, timescales and resources devoted to it by agreement with its Client. It is subject to the terms and conditions of any appointment to which it relates. Parties with whom SLR is not in a contractual relationship in relation to the subject of the message should not use or place reliance on any information, advice, recommendations and opinions in this message and any attachment(s) for any purpose.

© 2020 SLR Consulting Limited. All Rights Reserved.

---

**From:** Wray, Kate <[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)>  
**Sent:** 15 June 2021 15:30  
**To:** Greg Altria <[galtria@slrconsulting.com](mailto:galtria@slrconsulting.com)>  
**Cc:** Jackson, Catriona <[catriona.jackson@environment-agency.gov.uk](mailto:catriona.jackson@environment-agency.gov.uk)>  
**Subject:** Pen Mill - EPR/NP3107SM/A001 - Application not duly made

Hi Greg,

I have reviewed the application and supporting information for the above site and require the following points addressing before I can duly make the application:

1. Air quality assessment
  - a) The air quality assessment only considers human receptors. Please submit a revised assessment which includes the predicted impacts at nearby ecological receptors as there are a number of Local Wildlife Sites and an Ancient Woodland within the relevant screening distances.
  - b) Provide NGRs for the emission points.
  - c) PM2.5 has been assessed against a limit of 25 µg/m<sup>3</sup>. The limit for PM2.5 is 20 µg/m<sup>3</sup> as per our guidance. Please amend the assessment to reflect this.
2. Please submit a Dust Emission Management Plan in line with the [guidance on dust management plans](#) on the Gov.uk website. With reference to Table 1.19 of the [Environment Agency charging scheme](#) a fixed charge of £1,241 is payable for this plan and assessment. Please note that the additional fee must be paid in full before we can class the application as 'duly made'.
3. The Odour Management Plan does not meet the requirements as set out in our [H4 odour guidance](#) and BAT 15 of the [BAT Conclusions](#). Please submit a revised Odour Management Plan in line with the guidance.
4. Confirm which sewage treatment works the lorry wash effluent will discharge to.
5. Please confirm when the boiler first came into operation.
6. In accordance with Section 2.1.1 of the [BAT Conclusions](#) please confirm what your current specific energy consumption is and demonstrate that you can meet the relevant specific energy consumption level outlined in Table 2 of that section.
7. Grinding - please include emissions from the grinder in section 6.1 of the 'Best Available Techniques Assessment' document and confirm whether you can comply with the BAT-AEL for new plant provided in Bat 17, Table 4 of the [BAT Conclusions](#).

I understand that you have arranged to meet the area officer, Catriona Jackson, at the site on 30/06/21. This will provide the opportunity to discuss any outstanding queries you have before submitting your response. Please be aware that I may need to request additional information, following the site visit if further issues are identified, before the application can be duly made.

Please provide the information detailed above by **02/07/21**. If we do not receive the information by this date we will return your application.

If we do receive the requested information we'll 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 letter 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 application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

Please let me know if you have any queries in the meantime.

Kind regards

Kate

**Kate Wray**

Permitting Officer – Installations, National Permitting Service

**Environment Agency:** Trentside, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

[kate.wray@environment-agency.gov.uk](mailto:kate.wray@environment-agency.gov.uk)

External: 02030253297 Internal: 33297

Working days: Tuesday to Thursday



Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.