

27 June 2023
2023-001-L-001

Sent by Email

Kirstie Lythgo
Permitting Officer
National Permitting Service
Environment Agency
Horizon House
Deanery Road
Bristol
BS1 5AH

Dear Kirstie,

BESPOKE ENVIRONMENTAL PERMIT - SUBSTANTIAL VARIATION APPLICATION

Site Name: Etex Building Performance

Location: Redland Avenue, Easton-In-Gordano, Bristol, BS20 0FB

Applicant: Etex Building Performance Limited

Permit Application Reference Number: EPR/XP3036SZ/V008

Not Duly Made Response

Please find enclosed supporting documentation in response to your not-duly made email, received on 30/05/2023. For ease of reference, I have summarised each of your queries below, and signposted the relevant supporting documents relating to each item.

Due to the size of the supporting documents these cannot be attached to an email. Thus, you can access and download all files using the We Transfer link below. Should you have any issues downloading or opening any of the documents please get in touch.

<https://we.tl/t-vEmBMDKFyD>

1. I understand from speaking to the local site inspector that the operator wishes to amend the application to include changes to the dock-to-site conveyors and to include a new ball mill and associated silos and conveyors. Please therefore confirm any changes to the application since the submission of 10/03/2023. You will need to

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provide updated application documents for any confirmed application amendments. This may include, but not be limited to: a non-technical description identifying any new emission points, updated risk assessments demonstrating how relevant risks (e.g. dust and noise) are controlled under normal operation and in the event of a breakdown/accident, and a site plan showing locations of the plant and conveyors on site. In addition, I understand the new dock-to-site conveyor crosses the operator's land. I would therefore seek to understand who owns and controls the conveyors.

Response:

A meeting was held with the local site inspector (Paul Scotford) on Friday 09/06/2023. During this meeting it was agreed that Etex would update this variation application to include:

- the two new spur conveyors which traverse the Etex site, which connect to existing conveyors. It is proposed to include the two new spurs to be constructed off of the existing conveyors, as the sole purpose of these spurs will be to transfer gypsum from to the Etex site. The new spurs will be the only sections of conveyor wholly owned and controlled by the operator. The existing conveyors are owned and operated by Bristol Port Company and are currently permitted under an EPR Schedule 1 section 3.5 Part B activity issued by North Somerset Council to Bristol Ports Company (permit number; LAEP/B/BBHT1/21); and
- a new ball mill is to be located within an existing building. An existing silo linked to the ball mill is already installed and referenced within the permit. The silo will be re-purposed to facilitate the new ball mill, along with an adjacent vehicle loading bay.

By including the above new plant into this variation application, it has been necessary for us to update the following supporting documents. Please note these updated reports referenced below are to replace all previous versions submitted (with the exception of the noise report, which is an addendum to be read in conjunction with the previous reports submitted). The additional changes proposed above do not introduce any new point source emissions:

- Updated Site Condition Report (*R002i4 Etex Site Condition Report FINAL w apps*);
- Updated Environmental Risk Assessment (*2023-002-C-Etex-ERA-Final*);

- ERA Appendix A2a –Addendum Noise Technical Note;
 - Updated Noise Model Input Files;
 - Updated Operational Techniques and Monitoring Plan (2023-003-C-Etex-ERA-Final);
 - Updated Proposed Site Boundary and Emissions Plan (Etex Bristol Site Permit Boundary & Emissions Plan - June 2023 - V9).
2. Our records show that enhanced pre-application fees have not yet been paid, £720. However, I believe an overpayment of £40 has been made in the application fee (£19662 was paid instead of £19622 (£17,193 + £1,650 + 779)). Please arrange for the outstanding balance of £680 to be paid.

Response:

We can confirm that the outstanding fee of £720.00 was paid into the EA’s account on 21.06.2023. Please see payment reference below. Unfortunately, the outgoing payment had to match the invoice amount, thus we would request a refund for the £40 overpayment previously sent as part of the application fee.

Outgoing payment	4623003470	21.06.2023	21.06.2023	0.00	720.00	
Invoice	1223009678	24.06.2022	24.07.2022	0.00	720.00-	262761

3. You submitted a pdf. version of our H1 tool for the sewer discharge. However, we require a copy of the actual tool and input data files. Section 2.6 of the environmental risk assessment document states that analysis results are included at Appendix A4 but they were not included in the document we received. Please provide copies of these documents.

Response:

The above requested information has been provided and can be download via the WeTransfer link provided above. Documents include:

- Appendix A4a - H1 Tool for the sewer discharge; and
 - Appendix A4b - Analysis Results Dec 2022.
4. Please confirm the thermal input in MWth of the combustion plant; this is not stated clearly in the application e.g. the air quality assessment refers to thermal output. Ideally, provide manufacturer’s data sheets that confirm the thermal input.

Response:

We can confirm that where the Air Quality Assessment Report refers to thermal output, this actually relates to thermal input in MWth. To clarify, the thermal inputs for all new combustion plant to be added to be permit are as follows:

- Gypsum dryer (combi-dryer): The proposed combined total thermal input is 32 MWth; and
- Calciner: The proposed total thermal input is 19 MWth.

We trust that you can now deem the application as 'complete' and can confirm that the application has been duly made in due course.

Yours Sincerely,

Adam Clegg
Technical Director

cc.

Lee Townsend Lee.Townsend@etexgroup.com;

Richard José richard.jose@etexgroup.com.