

From: [Ankit Kapasi](#)
To: [Smith, Jennie](#)
Subject: Re: Application EPR-3404SR - Not duly made
Date: 13 December 2020 19:15:03
Attachments: [image001.jpg](#)
[image002.jpg](#)

Dear Jennie

I hope you are well.

Sorry, it has taken a while to get back to you on your last set of questions. We have been in touch with Cochran (the boiler manufacturer) and the information has been coming in bits and pieces.

I am sharing all the updates so far, which hopefully helps move some things along.

1. On your query of 'efflux velocity' and 'total flow', please see below how we have estimated some of the parameters:

Parameter	Value	Reference	Comment
Efflux Velocity	8m/s	Steam Boiler Schematic	Without Plant being in operation, a worst-case estimate has been chosen based on design book values
Total flow	135 m3/hr	GR Wright	Without Plant being in operation, a worst-case estimate has been assumed with flue gas flow being equal to the natural gas input flow.
Concentration of NO2	95 mg/m3 (long term)	Medium Combustion Plant Directive (ELV)	As the plant is not yet in operation and due to the (current) unavailability of exact emission values for ST-28 Cochran boiler, slightly lesser value than the emission limit value for NOx (100 mg/m3) due to natural gas firing has been assumed. Reference.

2. Information for Annex 1 of the MCP Directive + NOx data from Cochran (Boiler Manufacturer)

Cochran promises to share commissioning datasheets at the earliest (they are yet to complete the commissioning as there was not sufficient load on the boiler earlier). Once commissioned, the datasheets generated will give the **exact** NOx emission figures.

Annex 1 of MCP Directive:

1. Rated thermal input (MW) of the medium combustion plant.	1.342MW
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Other – Steam boiler plant
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Natural gas only
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the	TBC

operation is unknown, proof of the fact that the operation started before 20 December 2018.	
5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).	C.10.61 - Manufacture of Grain Mill Products/Grain Milling The following NACE code was pre-filled in the version you shared but I believe this won't apply: DA.15.40 - Manufacture of vegetable and animal oils and fats
6. Expected number of annual operating hours of the medium combustion plant and average load in use.	The company/site will operate the boiler (MCP) for up to 24 hours per day and up to 7 days a week depending on trade requirements. Until the mill is up and running it's difficult to estimate the running load but it is expected to be 60% of full capacity, as the boiler has been sized ready for a second mill to be installed at a later date.
7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs.	N/A

I hope this helps for now and as soon as I have the final commissioning datasheets from Cochran, I will forward them on. If there is anything else I can assist with, in the meantime, please let me know.

Kind regards,

Ankit

Ankit Kapasi
Environmental Sustainability Practitioner

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On Thu, Dec 3, 2020 at 2:56 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Hi Ankit

Thank you for sending this through. Unfortunately it does not include the information we need to be able to verify the H1 tool. The manufacturer should be able to provide the details required. Do you if they are willing to provide you with this information? Please could you confirm where the figures for efflux velocity and total flow came from or how they were calculated?

Could you also complete the following table

When applying to add an MCP to an installation, Operators must provide the information listed in Annex 1 of the MCP Directive.

1. Rated thermal input (MW) of the medium combustion plant.	
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Natural gas only
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	TBC
5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code).	DA.15.40 - Manufacture of vegetable and animal oils and fats
6. Expected number of annual operating hours of the medium combustion plant and average load in use.	
7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs.	

Best

Jennie

From: Ankit Kapasi [mailto:sensolutions.in@gmail.com]
Sent: 01 December 2020 04:55
To: Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>
Subject: Re: Application EPR-3404SR - Not duly made

Dear Jennie,

Thank you for your email. I am attaching all the relevant information/technical specification sheet available from the manufacturer. Should you require any more details on this, please let me know.

For the short term NO_x, we do not have access to emission inventory for this particular Cochran boiler (we have asked the manufacturer). The manufacturing data sheets only indicate that the boiler complies with the MCPD (also see attached MCPD fact sheet we used for reference).

Based on the emission limit value (ELV) set in the directive, we have come up with the long term emission concentration.

For short term emissions, we would need a test run of the boiler (alternatively, we get this for the supplier - which we have also requested).

(As the plant is not yet in operation and due to the unavailability of emission values for ST-28 Cochran boiler, a slightly lesser value than the ELV for NO_x (100 mg/m³) due to natural gas firing has been assumed).

The H1 tool indicated that if we don't specify the short term emissions, it would automatically take into account the long term emission figures (which is also actually a worst-case estimate). Would this be sufficient? If we get any more relevant information from the manufacturer, we will share this with you. Let me know if this is ok.

Thank you for your patience and support, Jennie. Much appreciated.

Kind regards,

Ankit

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On Mon, Nov 30, 2020 at 8:54 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Hi Ankit

Thank you for sending this through. Please could you forward the details / data sheets form the manufacturer so we can verify the data used. The information you previously provided doesn't include it. You have only included the long term, not short term NOx, this also needs to be included in the H1 tool.

Kind regards

Jennie

From: Ankit Kapasi [mailto:sensolutions.in@gmail.com]

Sent: 26 November 2020 16:45

To: Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>

Cc: James Wright <JamesW@wrightsfLOUR.co.uk>; Alan Cave <Alanc@wrightsfLOUR.co.uk>

Subject: Re: Application EPR-3404SR - Not duly made

Dear Jennie,

Thank you for your email.

As per your request, I have updated the calculations and will shortly share this updated version via **WeTransfer**. I will also share a PDF version of this file (please ignore the blank pages - this is how the PDF report is being generated).

As for the 'discharge consent', I can confirm that the application is under process. We will keep you posted on the progress.

Kind regards,

Ankit

Ankit Kapasi

Environmental Sustainability Practitioner

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On Thu, Nov 26, 2020 at 6:43 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Hi Ankit

I have tried to review the H1 assessment this morning however it is incomplete. Data from the manufacturer must be used in place of operational data for the tool to complete the calculations. Please complete and resend by 4th December.

Do you have an update on the drainage details?

- Please could you confirm that the discharge consent from the vehicle washing klargesteer washdown & silt separator is to public sewer? Is this consent in place / has been applied for?

Regards

Jennie

From: Ankit Kapasi [mailto:sensolutions.in@gmail.com]

Sent: 24 November 2020 17:16

To: Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>

Subject: Re: Application EPR-3404SR - Not duly made

Hello Jennie,

Shared via WeTransfer. If it still doesn't work, maybe if you can share a non-EA email ID where I can share the file?

Thanks,

Ankit

Ankit Kapasi

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On Tue, Nov 24, 2020 at 10:16 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Sorry Ankit, it is still blocked. If you could send via a link that would be great, hopefully I can open it then!

Thank you

Jennie

From: Ankit Kapasi [mailto:sensolutions.in@gmail.com]
Sent: 24 November 2020 15:22
To: Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>
Subject: Re: Application EPR-3404SR - Not duly made

Hi Jennie

Re-sending the H1 tool. Hope this works.

If not, I can send you the document via a WeTransfer link.

Kind regards,

Ankit

Ankit Kapasi

Environmental Sustainability Practitioner

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On Tue, Nov 24, 2020 at 8:19 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Hi Ankit

Thank you for your email, unfortunately the H1 tool has been blocked by outlook. Would you be able to try again, I have added your email address to my contacts. If it doesn't work I will investigate further.

Many thanks

Jennie

From: Ankit Kapasi [mailto:sensolutions.in@gmail.com]

Sent: 24 November 2020 12:30

To: Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>

Subject: Re: Application EPR-3404SR - Not duly made

Dear Jennie,

Sorry about this delay. I was just in the process of sending this to you when your email arrived. Please find the H1 for the boiler attached.

I am still waiting for formal confirmation from James Wright (who was away on leave

and has just returned today) on the status of the discharge consent (lorry wash area). I will confirm this as soon as I have the information.

Please let me know on the EMS too - would you be able to recommend 'improvement conditions' for some of the sections. I am sure the emergency preparedness and responses can be very quickly in place in the coming days. Note that the company has already started working on the EMS and a formal EMS will be in place within a few months of operations. In the meantime, they are going to use an adapted version of the EMS from Ponders End with the intention of refining it to higher standards.

They have an EHS manager with whom I will be working closely to develop this EMS.

Thanks again for your patience and best regards,

Ankit

Ankit Kapasi

Environmental Sustainability Practitioner

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On Tue, Nov 24, 2020 at 5:13 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Hi Ankit

I hope you are well.

I have not heard back from you regarding the submission of the H1, please could you confirm when you expect to submit this?

Many thanks

Jennie

From: Smith, Jennie

Sent: 17 November 2020 14:16

To: Ankit Kapasi <sensolutions.in@gmail.com>

Cc: James Wright <JamesW@wrightsfLOUR.co.uk>; Alan Cave <Alanc@wrightsfLOUR.co.uk>

Subject: RE: Application EPR-3404SR - Not duly made

Hi Ankit

I have checked the information provided. In order to duly make the application I will need the H1 assessment for the boiler. Our process and guidance allow for estimates to be used where operational data is not available as below, please see <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>

If you do not have existing data

Use estimates if you do not have existing data (for example if your activity is new). Where possible, use estimates based on similar operations elsewhere or from trials. Otherwise, use worst-case estimates. State what assumptions you've made for these estimates.

Please could you confirm that the discharge consent from the vehicle washing klargester washdown & silt separator is to public sewer? Is this consent in place / has been applied for?

The provision of the remaining documents meet the duly making requirements and I will continue to review them.

With regard to the BAT assessment, for many of the requirements you state that they will be in place by December 2023. This date is for existing plants to become compliant, new

installations should be compliant from the point of operation. I will discuss the possibility of including an improvement condition, for sections of the EMS to be completed ,with the site officer, although some of the points would need to be in place e.g. *xiii) emergency preparedness and response protocols, including the prevention and/or mitigation of the adverse (environmental) impacts of emergency situations.*

Please confirm when you expect be able to submit the completed H1.

Kind regards

Jennie

From: Ankit Kapasi [<mailto:sensolutions.in@gmail.com>]
Sent: 11 November 2020 13:34
To: Smith, Jennie <Jennie.Smith@environment-agency.gov.uk>
Cc: PSC Land <PSC@environment-agency.gov.uk>; James Wright <JamesW@wrightsflour.co.uk>; Alan Cave <Alanc@wrightsflour.co.uk>
Subject: Re: Application EPR-3404SR - Not duly made

Dear Jennie,

I hope my email finds you well.

We have now compiled the requested information that you requested.

There is one area where it is still a challenge to compile the information you requested (for a number of reasons), but particularly because the facility is not up and running yet and much of the information required is not available. This is to do with the *H1 assessment of the boiler*.

To give you a background on the use of the boiler, all steam raised is used as a direct injection into the wheat feed to condition it immediately before the pelleting process.

The boiler G R Wright are installing is a Cochran ST28 that meets the requirement of the 'Medium Combustion Plant Directive' which comes into force from December 2020 and complies with the lower emission standards (a fact sheet is attached). Given that this new boiler equipment has approved low emissions, I hope it would be possible to submit an H1 once the plant is operational in the coming weeks and there is more data available from the site. Please advice.

With the help of the G R Wright team, we have tried to compile the other information you have requested.

Please ***find attached*** the following:

- BAT assessment (both tabs General and Grain Milling populated)
- Risk assessment v2.0 (revised and updated to include habitat, biodiversity, designated sites)
- Dust emissions management plan v1
- Details of the boiler installed (fact sheet + Boiler Schematic)

Notes:

- Water discharges: (to address your queries on discharge consent)
 - Discharge water from the plant will go down the foul water drain
 - There will be vehicle washing as well which will be done its own dedicated area and will ***drain into a klargester washdown & silt seperator***, this has the ***discharge consent*** placed on it.

Fees:

As advised, I have asked colleagues at G. R. Wright & Sons to make the additional fee payment as following;

Habitat screening: £ 779

Dust emissions management plan (assessment fee): £1,241

Noise assessment fees £1,246

=====

Total: £3,266

When they make this payment, I will also request them to do so with a revised F1 form. I hope that is ok.

I am happy to have your views and comments on the H1 for the boiler. If it is absolutely mandatory, we can compile this making assumptions and estimates. However, it would be ideal to address this once the plant is up and running.

For any other queries, please feel free to contact me. Please note that I am away from the office between 13-16 November and 25-28 November, but with intermittent access to emails. I will aim to respond within 24 hours, but if any urgent attention is required, please feel free to address the email as 'urgent' and I will revert at the earliest.

Thank you for your patience and support.

Kind regards,

Ankit

Ankit Kapasi

Environmental Sustainability Practitioner

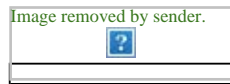
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On Thu, Oct 8, 2020 at 7:21 PM Smith, Jennie <Jennie.Smith@environment-agency.gov.uk> wrote:

Ankit

Thanks for your time this afternoon. As discussed there are a few points which need addressing prior to duly making the application, I have outlined these below.

- The BAT assessment provided does not provide specific detail to demonstrate how you will meet the BAT requirements. We have developed the attached spreadsheet for operators to demonstrate compliance with the current BAT conclusions. Please populate the two tabs

(generic and Milling) and return.

- Your risk assessment states a discharge from the washing process, please confirm where this discharges to.
- You have ticked no discharge to sewer however the site plans reference discharge consent, please confirm any discharge to sewer and provide updated plans if necessary.
- Your site plan includes a boiler house and the flow diagrams show that steam is used. Please provide the details of the boiler/s and process and an H1 assessment. If the results show detailed modelling is required this also needs to be submitted. I have attached a copy of our H1 tool, please refer to guidance at <https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits>. Your emissions plan will also need to be updated.

Management plans

- The site is within the screening distance for protected habitats and species and designated sites. Please address this in your risk assessment. In-line with our guidance we need additional fee to complete our assessment, amount due £ 779
- Our mapping software shows that there are residential receptors within 500m, the closest is approximately 230m from the site. As you are within 500m and handle dusty materials we require an emissions management plan for dust. Please refer to our guidance at <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>. We require an assessment fee of £1,241.
- You provided a noise assessment however the additional fee of £1,246 was not received.

Total payable £3,266

You submitted a fire prevention plan, however this is not a requirement for your activity. We will not formally assess this and therefore no charge is payable. Please ensure relevant risks are covered in the dust management plan requested.

Please send the information by 23/10/20. If you would like this to be extended please let me know. If we don't hear from you, we must return your application.

When we 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>

If you have any questions please don't hesitate to contact me.

Regards

Jennie

Jennie Smith BSc, MSc, AssocMCIWM

National Permitting Service – Part of Operations – Regulation, Monitoring and Customer

✉ Environment Agency, Horizon House, Deanery Road, Bristol, BS1 5AH

☎ 0208 4745960 (*internal 25960*) *Mobile: 07833481766*

✉ jennie.smith@environment-agency.gov.uk

♻️ Please consider the Environment before printing this email.

Please note my working days are Monday, Tuesday and Thursday.

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