Milnes, Connor

From: Paul Wright <pwright@slrconsulting.com>
Sent: 10 May 2022 08:11
To: Lythgo, Kirstie
Cc: Daniel Mark Lewis
Subject: RE: Application bespoke - Polynt Composites UK Ltd, EA/EPR/NP3807SA/A001
Attachments: 410.12276.00001_CCRA.pdf; 410.12276.00001_Part B2 Update.pdf

Morning Kirsty,

Please find attached an updated B2 application form and associated Climate Change Risk Assessment.

Regards,

Paul

Paul Wright
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From: Lythgo, Kirstie <Kirstie.Lythgo@environment-agency.gov.uk>
Sent: 06 May 2022 14:12
To: Paul Wright <pwright@slrconsulting.com>
Subject: FW: Application bespoke - Polynt Composites UK Ltd, EA/EPR/NP3807SA/A001

Hi Paul

Thank you for your and Graeme's time earlier. As we agreed please provide a response to the points in the email below by 09/06/2022. As discussed, my comment regarding the conversion from one to 24 hour averaging periods can be disregarded.

Just to confirm – the air quality assessment should reflect the realistic worst-case scenario of operation at the Stallingborough facility. So, if the facility is required to be able to run 3 months continuously as a worst-case (for example, in the event of a catastrophic failure at Leek), this must be the scenario that the air quality assessment is based on. We will permit the number of hours the assessment is based on (assuming the impacts are demonstrated to be not significant at those hours).

I will double check the assessment requirements for the boiler and get back to you as soon as I can, likely early next week.

Many thanks, and have a great weekend.

Kirstie

Kirstie Lythgo
Permitting Officer
National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer

Pronouns : she/her

How to say my name (phonetic spelling): Kuhrs-tee Lith-goh

Please note I work part-time. My usual working days are Monday - Wednesday, and Friday.

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From: Lythgo, Kirstie
Sent: 04 May 2022 12:35
To: pwright@slrconsulting.com
Subject: RE: Application bespoke - Polynt Composites UK Ltd, EA/EPR/NP3807SA/A001

Hi Paul

Thank you for your reply. We cannot duly make the application because there is information missing from the application:

1. With regard to your air emissions risk assessment, the short term PC for VOCs does not screen out, as per your revised Table 2. The short-term PC is 456% of the short-term environmental standard minus twice the long-term background concentration. As per our guidance:

Screen out PECs from detailed modelling

In the second stage of screening if you meet both of the following requirements you do not need to do any further assessment of that substance. You'll need to do detailed modelling of emissions that do not meet both of the following requirements:

- the short term PC is less than 20% of the short term environmental standards minus twice the long term background concentration
- the long term PEC is less than 70% of the long term environmental standards

Table 2
Updated AERA Air Quality Screening Results for Total VOCs, as C_6H_6

Pollutant	Total VOCs, as C_6H_6	
Averaging Period	24-hour	Annual
Total PC (µg/m³) [A]	133.06	0.06
EAL (µg/m³)	30	5
PC (as %age of EAL)	444%	1.2%
PC Significant?	Yes	Yes
Background Concentration [B,C] (Bg) (µg/m³)	0.405	0.405
Bg+PC (µg/m³)	133.46	0.464
Bg+PC (as %age of LT EAL)	45%	9.3%
ST EAL – Bg [a] (headroom)	29.6	-
PC as % of (ST EAL – Bg)	449.6%	-

As the short-term PC is more than 20% of the headroom, detailed modelling is required to support the application. I note that your own spreadsheet identifies the need for modelling:

	as Benzene	
Pollutant	VOCs	
	24-hour	Annual
Process Contribution (PC)	133.06	0.06
EAL (ug/m³)	30	5
PC (as %age of EAL)	444%	1.2%
PC Insignificant?	NO	NO
Background Concentration (Bg) (ug/m³)	0.405	0.405
LT PEC (Bg + LT PC) (ug/m³)	133.46	0.464
LT PEC (as %age of LT EAL)	445%	9.3%
ST EAL - 2*LT BG	29.6	
PC as % of (ST EAL - 2*LT BG)	449.6%	
Is detailed modelling required?	YES	NO

There are a couple of other aspects of the assessment that I would query at this stage:

- The use of an annual dispersion factor of 138.4. In accordance with our guidance, the effective stack height is zero (your spreadsheet states the release height is 9.5 m and the building height is 9m):

Treat the effective height of release as 0 metres when the emission is actually released at a point that's either:

- less than 3 metres above the ground or building on which the stack is located

This appears to be confirmed in section 4.2 of the original assessment document:

4.2 Effective Release Height and Dispersion Factors

For the AERA screening assessment 'effective stack heights' and dispersion factors have been applied as shown in Table 4-3.

As all points to air are less than 3m above the building an effective stack height of 0m was applied.

- The conversion of the monitoring period to a 24 hour average. Our guidance recommends the scaling of a one hour averaging period by 0.59 to convert to a 24 hour average. However the monitoring report suggests that monitoring was undertaken over 240 or 260 minutes:

Parameter	Sampling Date(s)	Sampling Times	Sampling
Total Particulate Matter Run 1	23 August 2017	08:50 - 12:52	240 mir
Total Particulate Matter Run 2	23 August 2017	13:05 - 17:07	240 mir
Volatile Organic Compounds Run 1	23 August 2017	09:01 - 13:21	260 mir

2. I have input the data into H1. The predicted results from my assessment appear to indicate that short-term PCs for PM_{10} do not screen out; the predicted max short-term PC is more than 20% of the headroom. This would indicate that detailed modelling should include impacts of particulate emissions.

3. Whilst the guidance:

Mobile MCPs and mobile boilers

MCPD controls do apply to mobile MCP placed on the market (for distribution or use) before 1 January 2017 and with an engine above 560 kilowatt (kW) drive output.

MCP placed on the market before 1 January 2017 but not operated for the first time until after 20 December 2018, is classed as a new MCP rather than an existing MCP.

MCPD controls do not apply to mobile MCP placed on the market after 1 January 2017. They're covered by the revised Non Road Mobile Machinery Regulations (NRMM). These regulations extended the scope of the previous NRMM Directive (engines up to 560kW drive) to include engines with no upper size threshold.

may indicate that certain mobile boilers (those placed on the market after 1 January 2017) are exempt from standalone MCP permitting, the boiler that is the subject of this application would be a DAA to the listed installation activity and would always be present and in use when the process is operated. As such the thermal input in MWth should be provided and the realistic worst-case impacts of emissions from the boiler should be assessed as part of this application.

4. We have concerns that a permit that limits the activity to 60 annual operating hours will mean the facility is unlikely to be able to fulfil its function, which is to act as a standby facility if the Leek facility is out of action. For example:

- in the event of a plant failure at Leek that requires spare parts that cannot be sourced within 60 hours, or
- a power outage at Leek of more than 60 hours duration, or
- if, in any given year, the Stallingborough facility has already been operated as described in the application to run a test batch, then there will be limited hours remaining to allow standby operation.

If more than 60 annual operating hours are required the dispersion modelling should reflect this.

Please provide more information on the types of scenarios that the operator anticipates could occur at the Leek facility that would cause the Stallingborough facility to start up. For each, include estimates of the likely durations and frequencies.

Additionally I have noticed that you used an older version of the application form Part B2 and therefore we do not have the information required by question 6b (climate change risk screening).

5. Please provide an updated version of form Part B2 with question 6b fully completed.

I can return the application to you now, as incomplete with the full fee refunded. You can then resubmit when you are ready.

Or, if you wish for us to continue with the application, you would need to provide the information detailed above within an agreed timescale. We usually require information to be submitted within 10 working days, but to give you a reasonable timescale to prepare detailed modelling we will extend this to 20 working days. Please note that if the information is not received in full at that stage the application will be returned to you and our charging scheme allows us to retain part of the application fee (up to 20% of the fee, capped at £1,500).

Please reply by 11 May 2022 to let me know how you wish to progress this application. Feel free to call me if you wish to discuss it.

Many thanks

Kirstie

Kirstie Lythgo
Permitting Officer
National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer

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How to say my name (phonetic spelling): Kuhrs-tee Lith-goh

Please note I work part-time. My usual working days are Monday - Wednesday, and Friday.

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From: Paul Wright <pwright@slrconsulting.com>
Sent: 28 April 2022 15:04
To: Lythgo, Kirstie <Kirstie.Lythgo@environment-agency.gov.uk>
Subject: RE: Application bespoke - Polynt Composites UK Ltd, EA/EPR/NP3807SA/A001

Hi Kirsty,

Please find our response attached along with relevant supporting information.

Regards,

Paul

SLR

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Technical Director - Environment Management, Permitting & Compliance

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From: Lythgo, Kirstie <Kirstie.Lythgo@environment-agency.gov.uk>
Sent: 13 April 2022 15:17
To: Paul Wright <pwright@slrconsulting.com>
Subject: Application bespoke - Polynt Composites UK Ltd, EA/EPR/NP3807SA/A001

> You don't often get email from kirstie.lythgo@environment-agency.gov.uk. Learn why this is important

Hi Paul

I have now reviewed the Polynt Composites application. Before I can duly make the application there are is some further information we require:

1. The Air Emissions Risk Assessment report states that it is a screening assessment. I presume this is using our H1 screening tool. Please provide:

   a. an electronic copy of the tool itself (the Access file and associated data files), or equivalent.
   b. a copy of the periodic stack emissions monitoring report for emission point A5 at the Leek facility referred to in section 4.1 of the report.
   c. The following input parameters: stack efflux velocity in m/s, VOC concentration in mg/m^3 input into the relevant field of H1.
   d. clarification of the source of the VOC concentration given in Table 2 of application form Part B3. Also, is '*Point A1'* referred to in this table emission point A40?

   IMPORTANT: section 4.1 of the report states, *'Following EA AERA guidance long-term emissions were adjusted to reflect the maximum 60-hours per year annual operation (0.68% annual utilisation factor)'.* You should be aware that we permit based on the application. Therefore if the predicted annual results have been adjusted for hours, we will limit the hours in the permit. Based on the air quality assessment provided, the operator will only be permitted to operate for 60 hours per year. The assessment should be based on a realistic worst-case scenario.

2. Section 1.1. of the report states that the diesel boiler is excluded from the scope of the assessment, based on EA guidance. Please clarify the basis for this exclusion, referring to the specific section/s of the guidance. Please also clarify the thermal input of the boiler – we permit on the basis of thermal input, but only the thermal output is referred to in the application.

3. The assessment is based solely on emissions from emission point A40. However there are other emission points identified within the proposed installation boundary on drawing 003 (A37-A39). Please clarify what these emission points are and how they relate to the installation application.

After today I am on annual leave, returning to work on 25th April 2022. Feel free to call me to discuss the points above after that date. Otherwise, please provide a response to the points above by Friday 29th April 2022.

Many thanks

Kirstie

Kirstie Lythgo
Permitting Officer
National Permitting Service ♦ Part of Operations – Regulation, Monitoring and Customer

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How to say my name (phonetic spelling): Kuhrs-tee Lith-goh

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