Milnes, Connor

From: Paul Wright <pwright@slrconsulting.com>
Sent: 28 April 2022 15:04
To: Lythgo, Kirstie
Subject: RE: Application bespoke - Polynt Composites UK Ltd, EA/EPR/NP3807SA/A001
Attachments: Polynt Composites_EA RFI_SLR response_Rev2.pdf; 410.12276.00001 Polynt AERA Emission points screening_REV1.xlsx; LNO 15538 Polynt A5 Report v1.pdf; LNO13703 Arkema A5 v1 REPORT.pdf

Hi Kirsty,

Please find our response attached along with relevant supporting information.

Regards,

Paul

SLR

Paul Wright
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

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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