

Claire Harling
Stoneness Road Chemicals Facility
Stoneness Road
West Thurrock
Grays
Essex
RM20 3AG

Our ref: **EPR/BJ7298IF/V007/RFI**
Your ref: **EPR/BJ7298IF**

Date: **15th May 2018**

Dear Miss Harling,

We need more information about your application

Application reference: EPR/BJ7298IF/V007

Operator: Industrial Chemicals Limited

Facility: Stoneness Road Chemical Facility

Thank you for your application received on 28th March 2018.

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions. We need to know:

- Form C2 – revised version submitted 30th May
 - Q2b – document referenced 'Appendix C2 2b Table 1' has not been included in the application submissions. Please submit. – amended to read 'appendix c3 5c' in the 'proposed changes document ref' column ← this doc has not yet been submitted ← this is the Non-technical summary and has been submitted.
 - Q3d – please answer this question. - answered
 - Q6 – please supply a quantitative risk assessment, in line with our guidance, for the following: – submitted
 - Any increase in emissions to air and/or water (surface water or sewer) associated with the proposed increased capacity of processes 3 and 4 **This question has still not been answered. I understand from your submissions that there are no emissions to water from these processes, but there are emissions to air (Chlorine and NOx) both via abatement plant. Can these abatement/scrubbers/recovery systems handle the proposed additional throughput? Please confirm.** – Processes 3 & 4 are not being expanded as they are already permitted to their maximum volumes.

- All proposed new plant (processes 5, 6 and 7) with respect to emissions to air and/or water (surface water or sewer)
Background: processes 8 – 11 cannot be included into this variation as they do not have known/estimated locations, designs or emissions. This information is required in order for BAT and emissions risk assessments to be carried out, which must be done during an application and cannot be included as improvement conditions.

This question has been answered with respect to emissions to air and water risk assessments from the proposed plant, thank you.

- The additional boiler blow down water emission to sewer/River Thames.

Background: your application (Non-Technical Summary) states that 'The Industrial Chemicals site already has permission to discharge boiler blow down water & waste water from Process 3 into the River Thames', however your current permit (EPR/BJ7298IFV006) seems to only permit boiler blow down to sewer via emission point S2.

This has not been included into the H1 assessment, nor has it been confirmed whether this emission is to surface water (TRaC) or sewer. The hazardous pollutants and temperature (at point of discharge) associated with boiler blowdown need to be assessed via the H1 method (emissions to estuaries and coastal waters / sewer - guidance) to demonstrate that they will not cause environmental harm. –The boilers referred are under the power application and supplied under the DAA.

- Part C3 – submitted

- Q1

- Please supply separate activity capacities – supplied.
- The sodium silicate activity should be a 4.2 A(1)(a)(v), please revise – this is fine as a 4.2A(1)(a)(iv) ignore this question

- Q2 – submitted

- Emission points to air and/or water for processes 3 and 4 need to be included in this table if there will be an increase in emissions due to the throughput increase

These have not been included into this table, no mention whether the increase will impact the emissions.

These have still not been included into this table.

Looking at current permit, we need confirmation that Chlorine scrubbers (SC1 & SC2) for process 3 and NOx scrubber for process 4 can cope with increased throughputs proposed. –

Process 3 & 4 scrubber units are already in existence and operating, there was just a change in names and allocations for Process 3, as there are now 2 chlorine burners & only 2 scrubbers. No change to the Process 4 emissions

- Any emission points to air and/or water associated with new processes 5 -7

Background: your application states that solutions from process 5 and 6 are filtered. We need you to provide details of how effective these filters are and how the effluent will be disposed (i.e. will it be tankered off-site or discharged to sewer)?

Your application also states that the condensate from Process 7 'is then treated and sent off-site for disposal', is this via tanker or is the treated condensate discharged to sewer? – the condensate final location is still in discussions between Industrial Chemicals and the Sulphuric acid supplier & is yet to be resolved.

Processes 5, 6, 8 and 11 have emission points to air which needs to be included into this table

Process 8 – if the wash waters from this process are discharged to sewer or surface water this also needs to be included in this table. – Wash waters from Process 8 are used as dilution water

as more water is required for dilution than produced from washing filters.

- Q3a, Table 3
 - Please submit BAT assessments for the proposed new processes, plant and any associated storage (for processes 5 – 7), in line with Technical Guidance Note S4.03: Inorganic Chemicals Sector.
not yet submitted.
Please note, BAT assessments for processes 8 – 11 will also need to be supplied in order for them to be included into the permit as a part of this variation.
There have still been no BAT assessment submissions for this proposed plant. You have suggested that this requirement be included in an Improvement Condition. I am currently discussing options for this and will update you as soon as possible.
 - The document provided does not show block diagrams of the proposed new processes on site. The document referenced in response to this question needs to include these for processes 5 – 7.
Material balance/block diagrams supplied for:
 - Sodium silicate production (process 8)
 - Aluminium sulphate production (process 10)
 - Poly-aluminium chloride production (process 9)
 - Ferrous and ferric chloride production (processes 5 & 6)
 - Concentration of dilute sulphuric acid via glass evaporator (process 7)
- Q3b, Table 4 – submitted
 - Please submit a fugitive emissions management plan for processes 5 – 7.
Background: The document submitted in response to this question appears to be a summary of your sites management system. The question asks for details surrounding how you will manage any fugitive emissions from the site as described in TGN EPR 4.03 as being important, or as shown to be important in your risk assessment.
- Q3c, Table 5
 - Please provide a breakdown of the total site capacity into specific activity capacities - **supplied**
 - Please revise document 'Appendix C3 3ci' to include the total amount of each raw material stored on site (not per process) - **supplied**
Background: this has not been included into the referenced supporting document.
Supplied. Some information still missing, please see annotated submitted document. A revision of this document does not seem to have been submitted. Please submit. Amended and attached to email
- Q3d, Table 6, Appendix 2 - submitted
 - Please answer Question 3 of this appendix.
This question has still not been answered. – box was ticked No, as none of the processes come under the IED
- Q4a, document reference: 'Appendix C3 4a Monitoring of emissions', please resubmit this document with the following revisions:
 - Process 5
 - A site specific risk assessment, in line with our guidance, for emissions of HCl to air needs to be carried out to support the decision to not monitor – **not yet submitted. Justification provided, thank you.**
 - There is no mention of any emissions to water from this

process. Please confirm whether there is any waste effluent from this process and how you propose to dispose of/reuse it.

– justification included

- Process 6
 - There is no mention of any emissions to water from this process. Please confirm whether there is any waste effluent from this process and how you propose to dispose of/reuse it.

– justification included

- Process 7
 - There is no mention of any emissions to water from this process. Please confirm whether there is any waste effluent from this process and how you propose to dispose of/reuse it.

– justification included

- Process 8 – what is the fate of the waste cleaning water from this process?

This information has still not been provided. – all wash water from the filters is used as dilution water, as the volume of water required for dilution is greater than produced from washing filters.

- Process 11 – please use the monitoring data recorded from your Newcastle site to carry out a H1 emissions to air assessment, in line with our guidance, for emissions of sulphuric acid to provide evidence that these emissions ‘screen out’ as insignificant.

Provided in H1 tool submitted.

Please send the information, quoting the above application reference, to:

Email address: psc@environment-agency.gov.uk.

Postal address:

Permitting and Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Please send the information within 10 working days of this letter. 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 you have any questions please phone me on 02030 252841 or email rach.hopkin@environment-agency.gov.uk.

Yours sincerely

Rach Hopkin
Senior Permitting Officer