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**From:** Claire Harling <CHarling@icgl.co.uk>  
**Sent:** 30 May 2018 19:58  
**To:** Hopkin, Rach  
**Subject:** RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation  
**Attachments:** Part C2 -amended.pdf; Appendix C3 3ci - amended.docx

Hi Rach,

Please find attached some of the information, I should have requested an extension of a few more days as it is 2 permits that have been applied for the variation to BJ7298IF & the power plant on permit no. SP3932JT. However on submission of some of the information, I see that you are not back until 4<sup>th</sup> June.

I have amended form C2 to answer Q3d.

Also amended and in a difference coloured ink to show the changes is C3 3ci for the raw material volumes. More information to follow tomorrow.

Kind regards  
Claire

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**From:** Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>  
**Sent:** 15 May 2018 14:50  
**To:** Claire Harling <CHarling@icgl.co.uk>  
**Subject:** Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

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 28<sup>th</sup> March 2018.

Our current workload means we are not allocating applications as quickly as we would like to and know that this is unacceptable to our customers. We have therefore changed our process temporarily to Duly Make applications before allocation to an officer for determination to ensure customers have a contact and are aware of additional information we may require.

Your application has been assessed by Rach Hopkin and found not to be of an acceptable quality to be Duly Made. We have confirmed what information is needed below:

- Form C2
  - Q2b – document referenced ‘Appendix C2 2b Table 1’ has not been included in the application submissions. Please submit.
  - Q3d – please answer this question.
  - Q6 – please supply a quantitative risk assessment, in line with our guidance, for the following:

- Any increase in emissions to air and/or water (surface water or sewer) associated with the proposed increased capacity of processes 3 and 4
- 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.*

- 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.*

- Part C3

- Q1

- Please supply separate activity capacities
- The sodium silicate activity should be a 4.2 A(1)(a)(v), please revise

- Q2

- 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
- 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?*

- 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.
- 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.

- Q3b, Table 4

- 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
- Please revise document 'Appendix C3 3ci' to include the total amount of each raw material stored on site (not per process)

*Background: this has not been included into the referenced supporting document.*

- Q3d, Table 6, Appendix 2

- Please answer Question 3 of this appendix.

- 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
- 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.
- 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.
- 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.

If the received information is of sufficient quality to allow the application to be Duly Made it will Duly Made from the date we received the additional information. The application will then be allocated to the next available officer for determination.

If the information is not received within 10 working days of this email (29<sup>th</sup> May) or is not of sufficient quality to allow the application to be Duly Made then your application will be returned to you.

We hope this small change will mean you can provide the additional information to allow your application to be Duly Made earlier.

Once an application is Duly Made, we may still need additional technical information to complete the determination but this will be requested via the schedule 5 process.

Please quote our reference if you contact us. If you have any questions please phone me on 02030 252841 or email [rach.hopkin@environment-agency.gov.uk](mailto:rach.hopkin@environment-agency.gov.uk).

Thank You & Kind Regards,

**Rachel Hopkin BSc Hons Chemistry**

Senior Permitting Officer – Installations – National Permitting Service | West Midlands Area

Environment Agency | Sapphire East, Streetsbrook Road, Solihull, B91 1QT

Contact | Email: [rach.hopkin@environment-agency.gov.uk](mailto:rach.hopkin@environment-agency.gov.uk) | Ext: 02030 252841 | Int: 52841 | [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)



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