
From: Claire Harling <CHarling@icgl.co.uk>
Sent: 06 July 2018 17:28
To: Hopkin, Rach
Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation
Attachments: Appendix C3 3ci - amended 2nd time.docx; Part C3 - amended for the 2nd time.pdf; FINAL NDM RFI - response CA for operator - operator response.doc

Hi Rach,

I have responded to all the comments - answers in blue & the additions to Appendix C3 3ci - additional information is in green. My close of play is 5.30pm, due to my start time in the mornings.

Kind regards
Claire

-----Original Message-----

From: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>
Sent: 29 June 2018 18:37
To: Claire Harling <CHarling@icgl.co.uk>
Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Claire,

I have now assessed your submissions. Unfortunately there is still some missing information, please find the outstanding information request annotated on the attached document.

Please provide this information by close of play on Friday the 6th July.

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 | Ext: 02030 252841 | Int: 52841 |
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-----Original Message-----

From: Claire Harling [mailto:CHarling@icgl.co.uk]

Sent: 28 June 2018 11:56

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Rach,

I can only say, thank you for your patience more than more than the other way.

Kind regards

Claire

-----Original Message-----

From: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>

Sent: 27 June 2018 17:50

To: Claire Harling <CHarling@icgl.co.uk>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Claire,

I am still assessing your submissions to the Not Duly Made letter, apologies for the delay. I should have completed this by close of play tomorrow, close of play Friday being the worst case scenario (I am involved in some recruitment tomorrow).

Thank you for your patience.

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 | Ext: 02030 252841 | Int: 52841 |
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-----Original Message-----

From: Claire Harling [mailto:CHarling@icgl.co.uk]

Sent: 25 June 2018 07:26

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Rach,

Please find attached the materials balance for Process 10. I have attached the H1 via your other email due to the size. Fully amended C3 & C2, please discard previous versions sent. Site drawing showing proposed layouts for Processes 8, 9, 10 & 11. Plus a few other tiny amended documents and I think that that is it.

Kind regards
Claire

-----Original Message-----

From: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>
Sent: 22 June 2018 13:40
To: Claire Harling <CHarling@icgl.co.uk>
Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Claire,

9am on Monday will be fine. This will however, without exception, be the final extension.

I hope you understand.

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 | Ext: 02030 252841 | Int: 52841 |
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-----Original Message-----

From: Claire Harling [mailto:CHarling@icgl.co.uk]
Sent: 22 June 2018 12:56
To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>
Subject: Re: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Rach,

Please accept my sincere apologies and due to having to take today off (kitchen electrical issues). I would really appreciate it you would extend it until 9am on Monday and all of it will be with you.

I know I had promised it before, but this time it will happen.

I am on my mobile 07971826232 if this helps.

Kind regards

Claire

Sent from my Samsung Galaxy smartphone.

----- Original message -----

From: "Hopkin, Rach" <rach.hopkin@environment-agency.gov.uk>

Date: 22/06/2018 11:58 (GMT+00:00)

To: Claire Harling <CHarling@icgl.co.uk>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Claire,

I still haven't received the below mentioned information. Has this been sent? We sometimes have issues with our email servers and things don't get through.

I'm afraid that if I don't receive these submissions by close of play today I will have to return this application.

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

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From: Claire Harling [mailto:CHarling@icgl.co.uk]

Sent: 15 June 2018 14:22

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Rach,

All information will be with you on Monday morning. I really appreciate the patience you have had for me. We have also had confirmation that the reading of 500mg/N for NOx from the engines is at 5% O2, which when calculated is less than the 190mg/N at 15% O2 that the MCPD states.

Kind regards
Claire

From: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk<mailto:rach.hopkin@environment-agency.gov.uk>>
Sent: 13 June 2018 18:06
To: Claire Harling <CHarling@icgl.co.uk<mailto:CHarling@icgl.co.uk>>
Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Claire,

Thank you for your submissions.

Please find attached a copy of the NDM letter with completeness assessment notes highlighting what has been submitted and what's outstanding.

With regards to including the sulphuric acid concentration activity as a 4.2 activity rather than a waste recovery activity, this is fine with the included end of waste justification.

With regards to the below sentence in your previous email, do you mean process 11 for the sodium citrate production?

[cid:image012.jpg@01D40A1F.FB680830]

Could you please provide a complete list of process numbers against process descriptions for processes 5 - 11 as there are some discrepancies in the submissions.

From document 'Appendix C3 1 Table 1a - amended':

[cid:image013.jpg@01D40A1F.FB680830]

From document 'Appendix C3 4a'

[cid:image015.png@01D40A1F.FB680830][cid:image016.png@01D40A1F.FB680830]

There is no process 11 mentioned in this document.

Please could you provide me with a date for when the outstanding information will be submitted? As this is now past the originally agreed deadline, I can technically class the application deemed withdrawn.

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

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From: Claire Harling [mailto:CHarling@icgl.co.uk]

Sent: 12 June 2018 23:58

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk<mailto:rach.hopkin@environment-agency.gov.uk>>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Rach,

I've had to go to Port Talbot for a couple of days, the signal and internet connection on site is poor. Please find attached some of the changes/more information that you require. In regards to the sulphuric acid we were discussing I have attached the end of waste document from the supplier to show why I have allocated it still within section 4.2 and not in the reclamation/recovery of waste. However if you do still wish for me to put it as a reclamation/recovery product, then I will.

I am still waiting from our draughtsmen, the amended site layout to show where we think Processes 8, 9, 10 & 11 will be going. They will definitely be within this area, but the exact location is still to be confirmed as piling will be required & as it is on the old power station coalfield and the piling will determine the plots.

I still need to finish the H1 amendments to both applications and a couple of the other bits. I have attached the material balances for the processes for you, plus the drawings for Process 7, which are all part of Q3a. These material balances, although titled for our other sites, the manufacturing processes are exactly the same. I am still in the process of putting them into the West Thurrock file of the EMS. The only material's balance outstanding is the one for the production of sodium citrate (process 10).

Kind regards

Claire

From: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk<mailto:rach.hopkin@environment-agency.gov.uk>>

Sent: 05 June 2018 17:24

To: Claire Harling <CHarling@icgl.co.uk<mailto:CHarling@icgl.co.uk>>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

Hi Claire,

Thank you for these submissions, I'll keep an eye out for the final submissions on the 12th June.

With regards to the Scheduled Activity for the sodium silicate activity, this could fall under either section 4.2A(1)(a)(iv) or (v) and therefore is fine to remain as 4.2A(1)(a)(iv), please feel free to ignore this section of the Schedule 5 Notice.

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

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From: Claire Harling [mailto:CHarling@icgl.co.uk]

Sent: 30 May 2018 19:58

To: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk<mailto:rach.hopkin@environment-agency.gov.uk>>

Subject: RE: Industrial Chemicals Ltd - Stoneness Road Chemical Facility - EPR/BJ7298IF/V007 - L&T 37852 - PAS BP3132JP - Substantial Variation

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 4th 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

From: Hopkin, Rach <rach.hopkin@environment-agency.gov.uk<mailto:rach.hopkin@environment-agency.gov.uk>>

Sent: 15 May 2018 14:50

To: Claire Harling <CHarling@icgl.co.uk<mailto: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 28th 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

o Q2b - document referenced 'Appendix C2 2b Table 1' has not been included in the application submissions. Please submit.

o Q3d - please answer this question.

o Q6 - please supply a quantitative risk assessment, in line with our guidance<<https://www.gov.uk/government/collections/risk-assessments-for-specific-activities-environmental-permits>>, 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

o Q1

§ Please supply separate activity capacities

§ The sodium silicate activity should be a 4.2 A(1)(a)(v), please revise

o 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?

o 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<<https://www.gov.uk/government/publications/inorganic-chemicals-sector-additional-guidance>>.

§ 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.

o 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.

o 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.

o Q3d, Table 6, Appendix 2

§ Please answer Question 3 of this appendix.

o 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<<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>>, 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 (29th 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

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