

## Clark, Wayne

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**From:** Paul Wright <pwright@slrconsulting.com>  
**Sent:** 03 March 2023 16:09  
**To:** Bates, Jonty  
**Subject:** FW: EFC Concrete application EPR/DP3443QN  
**Attachments:** 262869.pdf

Hi Jonty,

EFC have confirmed that they paid the pre-app advice invoice on 7 October 2022, see below.

Regards,

Paul

### Paul Wright

He/Him/His

European Industry Business Sector Leader

+44 161 872 7564  
+44 7786 808408  
pwright@slrconsulting.com

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**From:** Andy Izod <andy.izod@wagnersefc.co.uk>  
**Sent:** Friday, March 3, 2023 3:23 PM  
**To:** Paul Wright <pwright@slrconsulting.com>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Paul,

We paid the pre-application invoice on 19-OCT-2022, as shown below: -

Invoice	Transaction	Type	Invoice	Note	Details	Amount	Cur...	Transacted Currency
08-JUL-2022	07-OCT-2022	CI	262869		24000155	-1,200.00	GBP	
08-JUL-2022	19-OCT-2022	CP	262869		Chq#107	1,200.00	GBP	
19-OCT-2022	20-OCT-2022	CI	GOVT FEE-INV262869		24000167	-3,032.00	GBP	
19-OCT-2022	21-OCT-2022	CP	GOVT FEE-INV262869		Chq#115	3,032.00	GBP	

Regards


**Andy Izod**  
**UK Regional Manager**



EFC Green Concrete Technology UK Ltd  
Hainault Road, Romford, Essex, RM6 5SS  
Mobile: + 44 7498 414995  
Web: [www.earthfriendlyconcrete.com](http://www.earthfriendlyconcrete.com) | Email: [andy.izod@wagnersefc.co.uk](mailto:andy.izod@wagnersefc.co.uk)

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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** 03 March 2023 09:38  
**To:** Andy Izod <[andy.izod@wagnersefc.co.uk](mailto:andy.izod@wagnersefc.co.uk)>  
**Subject:** FW: EFC Concrete application EPR/DP3443QN

Hi Andy,




Please see emails below.

I can't find any evidence that we actually received an invoice, but can you please check from your side, as it may have been issued directly? If so, can you please check if payment was made?

Thanks,

Paul

**Paul Wright**  
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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** Friday, March 3, 2023 9:24 AM  
**To:** Bates, Jonty <[Jonty.Bates@environment-agency.gov.uk](mailto:Jonty.Bates@environment-agency.gov.uk)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Jonty,




I've just reviewed all of my emails and I don't believe we ever received an invoice for the pre-app advice.

If an invoice could be issued, we'll arrange payment asap.

Thanks,

Paul

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**From:** Bates, Jonty <[Jonty.Bates@environment-agency.gov.uk](mailto:Jonty.Bates@environment-agency.gov.uk)>  
**Sent:** Thursday, March 2, 2023 2:07 PM

**To:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

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Good afternoon Paul,

I've familiarised myself with the application and have been completing the necessary admin to duly make the application and consult.

One thing that I've noticed is that the enhanced pre-application has been flagged as not being paid, which is one of our completeness and duly making checks. I have sent a query to our pre-application team to check on the invoice/payment, but in the interim I wanted to let you know where I was up to and check with yourself whether or not you had received an invoice for the enhanced pre-app?

I cannot proceed with duly making the application, and therefore consultation, if there is a fee outstanding but I have positioned everything so that I am able to proceed forthwith once this is resolved.

I also wanted to let you know as well that I will be out of office Friday 3<sup>rd</sup> March and Monday 6<sup>th</sup> March and will return next Tuesday.

Thanks,

**Jonty Bates**

Permitting Officer – Installations, National Permitting Service  
Part of Operations – Regulation, Monitoring and Customer  
**Environment Agency | Aqua House, 20 Lionel Street, Birmingham, B3 1AQ**

External: 07341 101 917 | Internal: Please contact me via MS Teams

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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** 24 February 2023 11:43  
**To:** Bates, Jonty <[Jonty.Bates@environment-agency.gov.uk](mailto:Jonty.Bates@environment-agency.gov.uk)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Jonty,

Apologies for not taking your call – my mobile had died, so your email prompted me to put it in charge!

Happy to have a call once you've familiarised yourself with the application.




Regards,

Paul

**Paul Wright**

He/Him/His

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**From:** Bates, Jonty <[Jonty.Bates@environment-agency.gov.uk](mailto:Jonty.Bates@environment-agency.gov.uk)>  
**Sent:** Friday, February 24, 2023 11:36 AM  
**To:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

You don't often get email from [jonty.bates@environment-agency.gov.uk](mailto:jonty.bates@environment-agency.gov.uk). [Learn why this is important](#)

Good morning Paul,

I'm just following up the message I left for you this morning letting you know that this application has been reallocated to me and I will familiarising myself with the application and duly making it as per Dan's update, below.

Please do not hesitate to contact me and I will be in touch soon once the application has been duly made.

Kind regards,

**Jonty Bates**

Permitting Officer – Installations, National Permitting Service  
Part of Operations – Regulation, Monitoring and Customer  
**Environment Agency | Aqua House, 20 Lionel Street, Birmingham, B3 1AQ**

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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** 23 February 2023 12:10  
**To:** Timney, Daniel <[daniel.timney@environment-agency.gov.uk](mailto:daniel.timney@environment-agency.gov.uk)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN




Great, thanks for the update.

Regards,

Paul

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**From:** Timney, Daniel <[daniel.timney@environment-agency.gov.uk](mailto:daniel.timney@environment-agency.gov.uk)>  
**Sent:** Thursday, February 23, 2023 11:58 AM  
**To:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Paul,

I've now received confirmation that we can duly make the application. This will be followed by the 28 day consultation period and then determination.

Best regards,  
Dan

**Dan Timney** MSc.  
Principal Permitting Team Leader

National Permitting Service – Part of Operations – Regulation, Monitoring & Customer

Aqua House, 20 Lionel Street, Birmingham, B3 1AQ.

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[daniel.timney@environment-agency.gov.uk](mailto:daniel.timney@environment-agency.gov.uk)

External: 02030 232 663 | Mobile: 07769235392  
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Website: [www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** 20 February 2023 10:48  
**To:** Timney, Daniel <[daniel.timney@environment-agency.gov.uk](mailto:daniel.timney@environment-agency.gov.uk)>  
**Subject:** FW: EFC Concrete application EPR/DP3443QN




Hi Daniel,

I was wondering if there is any update on this application, as it was being prioritised for duly making?

Thanks,

Paul

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**From:** Gosling, Laura <[Laura.Gosling@environment-agency.gov.uk](mailto:Laura.Gosling@environment-agency.gov.uk)>  
**Sent:** Friday, February 3, 2023 4:22 PM  
**To:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Paul,

Thank you for your email and apologies for not getting back to you sooner. I understand a decision is being made regarding this application and someone will be in touch soon.

I say 'someone' as I am having to take a period of extended leave from work. I will be returning in early April. As this is all quite sudden, I don't have a permitting officer contact for you but my manager, Daniel Timney will be working out a plan from Monday. You can contact him on [Daniel.timney@environment-agency.gov.uk](mailto:Daniel.timney@environment-agency.gov.uk)

Best wishes,  
Laura

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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** 30 January 2023 14:56  
**To:** Gosling, Laura <[Laura.Gosling@environment-agency.gov.uk](mailto:Laura.Gosling@environment-agency.gov.uk)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Laura,

Further to our call last week, my client has confirmed the following:

- an initial exotherm of the digester contents while dissolving the raw materials still under atmospheric pressure. This peaks around 91°C. The materials inlets are vented to atmosphere while filling.
- The temperature of the inlet steam quickly rises then drops as the steam valve is first opened, and the boiler supplies its first, hot demand, refills and cools.
- The digester gradually heats to achieve equilibrium with the boiler output.
- The boiler then recovers, and temperatures (and pressures) equilibrate.
- Over time the temperature cycles as the hysteresis of the boiler setpoints react to the heat losses to atmosphere of the digester.
- After approximately eight hours the supply of steam to the digester is shut off and all temperatures begin to drop fairly rapidly.
- The temperature of the vessel bands is always below the maximum temperature of the steam supply.
- Once steam supply is shut off all temperatures drop quickly.
- Therefore there are no significant exotherms present.

Also, it should be noted that the digester has its own separate pressure relief valve vented to the blowdown tank. This is set to operate below the design pressure (and therefore temperature-saturated steam conditions) of the digester.

If you require any further information, please let me know?

Regards,

Paul

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**From:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Sent:** 24 January 2023 13:58  
**To:** Gosling, Laura <[Laura.Gosling@environment-agency.gov.uk](mailto:Laura.Gosling@environment-agency.gov.uk)>  
**Subject:** RE: EFC Concrete application EPR/DP3443QN

Hi Laura,

Apologies, I was on leave last week.

We provided information on the intrinsic safety of the process in Section 4.1 of the BATOT document, I have provided additional information below to address your specific queries.

1) Over-pressurisation of the digester

Over-pressurisation of the digester cannot occur. The digester is a rated pressure vessel with a design pressure of 18.35bar, see Appendix 2 document provided. The only source of pressure to the digester is the boiler, there is no exotherm or pressure development from the process inside the digester. The boiler is rated at 15bar maximum, see Appendix 1 document provided, so significantly below the design pressure of the digester and has pressure relief valves fitted, so there is no possibility of a pressure in excess of 15bar being applied to the digester from the boiler.

Additionally, the digester vessel also has a safety relief valve fitted which vents to the blowdown tank. This relief valve is set at 15bar, again significantly below the design pressure of the digester.

2) Overheating of the digester

As mentioned above the process within the digester is not exothermic. The only source of heat to the digester is the boiler.

The normal operating temperature of the boiler is approximately 185°C, which is governed by the maximum operating pressure of the boiler. This temperature is governed by the boiler output, a large increase in pressure is required for a small increase in temperature and hence the physical limits of the boiler and the fail safe measures in place mean that the boiler would shut down before overheating of the digester could occur.

3) Containment

All containment measures on site will comply with CIRIA C736 requirements.

Regards,

Paul



Paul Wright

He/Him/His

Technical Director & Technical Discipline Manager - Environment Management, Permitting & Compliance

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**From:** Gosling, Laura <[Laura.Gosling@environment-agency.gov.uk](mailto:Laura.Gosling@environment-agency.gov.uk)>  
**Sent:** 19 January 2023 14:55  
**To:** Paul Wright <[pwright@slrconsulting.com](mailto:pwright@slrconsulting.com)>  
**Subject:** EFC Concrete application EPR/DP3443QN

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Hi Paul,

I have tried calling you today but I haven't been able to get through.

I have been assessing the bespoke application for EFC Concrete EPR/DP3243QN/A001 and in particular, establishing whether the installation can be considered a low impact installation.

As you are aware, we assess whether an installation can be classified as low impact based on the criteria listed in application form guidance for Part B2, Appendix 2. I am confident that most of the criteria have been met. However, as highlighted in the pre-application discussions and subsequent response (dated 20 June 2022), the decision hinges on whether the process concerning the digester can be considered intrinsically low impact. In particular, we are concerned with the environmental impact of a catastrophic failure of the digester and any potentially explosive situations.

Please can you provide further details on the consequences of a major over-pressurisation or overheating event within the digester. Please could you also describe in more detail the containment measures, in particular, confirm that the building housing the digester is bunded to a volume that can contain the full digester contents.

I would appreciate a response by the 26<sup>th</sup> January 2023.

After today I will not be available until Tuesday 24<sup>th</sup> January but I'd be very happy to have a discussion with you then if you would like to talk this through.

Many thanks,  
Laura

## Laura Gosling

Permitting Officer  
National Permitting Service – Part of Operations – Regulation, Monitoring & Customer

Aqua House, 20 Lionel Street, Birmingham, B3 1AQ.

### Environment Agency

[laura.gosling@environment-agency.gov.uk](mailto:laura.gosling@environment-agency.gov.uk)

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