ROYSTON SITE ENVIRONMENTAL PERMIT VARIATION APPLICATION

Non-Technical Summary

Prepared for: **Johnson Matthey PLC**

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APPENDICES

1.0 Introduction

SLR Consulting Ltd (SLR) has been instructed by Johnson Matthey PLC (JM) to prepare an application for a variation to the Environmental Permit (Ref: EPR/BT7086IJ) (the Permit) for their Royston Site located at Orchard Road, Royston, Hertfordshire, SG8 5HE (the Site).

This Non-Technical Summary (NTS) provides a summary of the regulated facility, an explanation of the changes being applied for in the variation and a summary of key technical standards and control measures associated with the proposed changes that will be implemented at the Site.

1.1 The Site

The Royston Site operates under a multi-activity installation environmental permit. The Site is currently permitted to operate a variety of diverse and complex activities mainly involving the refining of precious metals, development of speciality chemicals and subsequent processing into a diverse range of products. The existing operations include autocatalyst and process catalyst manufacture, precious metal refining and fabrication, chemical production and engine/auto catalyst test facilities.

The main production activities consist of the following business units: Clean Air Operations (CAO), Refining & Chemicals Europe (R&CE), Noble Metals and Silver Coating Technologies (SCT).

Smaller-scale activities at the site include the Research and Development, Autocatalyst Testing and Metal Joining operational units.

There are also a number of ancillary operations which are generally operated on a site-wide basis and shared by more than one operational unit. These include Site Effluent Treatment Plant, Values Recovery Plant, Dispensing and Packing, Boiler House, Analytical Laboratories, Engineering, Main Stores, and Combined Heat and Power plant.

The site is located in the north-western part of Royston, within the A505 Royston bypass. A number of residential, commercial and agricultural receptors are located in close proximity to the site. In addition, two SSSIs and several other conservation sites lie within 2km of the site boundary.

2.0 Proposed Development

JM are developing a new hydrogen fuel cell manufacturing facility at the Royston Site as part of the company's pledge to invest ca. £1 billion in the research, development and deployment of clean hydrogen technologies by 2030. This will require a variation to the existing Permit to include the following changes:

1	Project Apollo	Production of coated membrane with Platinum Group Metals (PGM) (platinum). 2 Directly Associated Activities (DAA) – analytical laboratory and dispensing and packaging
2	Hydrogen Technology Test Facility	The installation of the Test Stand facility will include four Single Cell Test Stands for testing individual cells up to 0.5 kW output, and three larger Short Stack Test Stands for testing stacked cells up to 12 kW output.

3	Boiler Replacement	Replacement of three existing site boilers with three new boilers to a more efficient specification.

3.0 Pre-Application advice

Enhanced pre-application advice was sought from the Environment Agency (EA). A pre-application meeting was held on 10th August 2022 and written advice was received on 30th August 2022. A copy of advice received from the discussions is provided in Appendix 01.

4.0 What is being applied for

4.1 Regulated Activities

Following pre-application advice from the EA, Johnson Matthey confirmed that the following proposed changes will be regulated as listed activities under Schedule 1 of the Environmental Permitting (England & Wales) Regulations
2016 (as amended) as follows:

1	Project Apollo	*Section 4.2 Inorganic Chemicals Part A(1) (c) any manufacturing facility involving the use of, or the use and recovery of, any compound of any of the following metals (viii) platinum.* And *Section 6.4 Coating activities, printing and textile treatments Part B (a) any process (other than for the re-painting or re-spraying of, or of parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of (i) 20 or more tonnes of printing ink, paint or other coating material which is applied in solid form.*

Johnson Matthey has put on hold the PU12 2A project and as a result will no longer form part of this variation application.

4.2 Directly Associated Activities

The following activities will be regulated as directly associated activities:

- Hydrogen Technology Test Facility; and
- Replacement boilers.

4.3 Application Fees

The application fees include the following:

• New S4.2 A(1)(c)(viii) activity (Apollo):	£13,209
• Habitat Assessment	£779
The total application fees are therefore:	£13,988

5.0 Application Contents

To support this application, the following documentation is submitted in addition to this NTS:

- Section 2: Application Forms Parts A, C2, C3, F1 and relevant appendices;
- Section 3: Drawings;
- Section 4: Best Available Techniques and Operating Techniques (BATOT); and
- Section 5: Environmental Risk Assessment.

5.1 Drawings

The following drawings have been prepared in support of this application:

- Drawing 001 Site Location Plan
- Drawing 002 Site Layout
- Drawing 003 Environmental site setting & Receptors
- Drawing 004 Cultural and Natural Heritage Receptors

They are enclosed as Section 3 of this application.

5.2 Best Available Techniques and Operating Techniques

The Best Available Techniques and Operating Techniques (BATOT) document describes how the proposed new activities have been designed and will be operated in accordance with Best Available Techniques (BAT) as described in EA guidance and the relevant Bref notes. The document includes an overview of the technical, operational and management measures that will be apply to the activities.

The BATOT is enclosed as Section 4 of this application.

5.3 Environmental Risk Assessment

The Environmental Risk Assessment has considered the risks posed by the proposed facility to the environment. It includes assessment of relevant environmental impacts for each of the proposed changes, in accordance with EA guidance *'risk assessments for your environmental permit'*.

An Air Emissions Risk Assessment (AERA) which includes a detailed dispersion model of the combined releases from the proposals has been carried out.

A Noise Impact Assessment of the combined proposals has been carried out.

The Environmental Risk Assessment is enclosed as Section 5 of this application.

6.0 Key Technical Standards and Control Measures

6.1 Technical Standards

The key technical standards that will be followed for the site are:

- Production of Speciality Inorganic Chemicals Best Available Techniques Reference document (Bref), published August 2007, European IPPC Bureau;
- Common Waste Gas Management and Treatment Systems in the Chemical Sector Bref, final draft published March 2022, European IPPC Bureau;
- Additional Guidance for the Inorganic Chemicals Sector EPR 4.03, published March 2009, Environment Agency;
- Risk assessments for your environmental permit, last updated 1 April 2022, Environment Agency, gov.uk;
- Control and monitor emissions for your environmental permit, last updated 17 May 2021, Environment Agency, gov.uk; and
- Develop a management system: environmental permits, last updated 4 August 2021, Environment Agency, gov.uk.

The pollution control measures relevant to the proposed activities are described in the BATOT and ERA documents submitted with the application.

The proposals have been assessed against and meet the technical standards described above.

APPENDIX 01

EA Pre-application enhanced advice

Richard Mensah

Johnson Matthey plc

Orchard Road

Royston

SG8 5HE

Our reference: EPR/BT7086IJ/V018

Date: 30/08/2022

Dear Richard

Pre application advice – Enhanced service

Site: Johnson Matthey plc, Royston.

Thank you for your pre application enquiry on 04/05/2022.

I am pleased to provide you with your enhanced level of pre-application advice. This advice is based on the information provided on your pre application advice form and conversations/emails recorded on the following dates:

- Emails on 23/05/2022, 23/06/2022 and 22/08/2022.
- Teams Meeting on 10/08/2022.

What enhanced pre application covers

Further information on the enhanced pre-application service is detailed on section 2 of the Environmental permitting charges guidance on GOV.UK.

As part of this service we have provided you with the following information:

Application reference number	EPR/BT7086IJ/V018
Habitats screening	Document included separately
Documents attached	Habitats Screening
Application charge required	See advice information
Forms required to be submitted	Application Forms – Part A, C2, C3 and F1 (and C6 if changes to effluent discharge)
Additional documents required	See advice information
Additional information	See advice information

Advice

Application and Charging

The information supplied by Johnson Matthey plc on the projected site changes and required permit variation is:

1. Project Apollo
   Production of coated membrane with PGMs (platinum) and two DAAs of analytical laboratory and dispensing/packaging.
   Requiting a new stack releasing VOC (ethanol and propanol types), NOx and CO.
   Proposed regulation under either S4.2 A(1)(c)(viii) or S6.4 B(a).

2. PU12 2A
   Installation of equipment to produce 20mT of catalyst in existing PU12 building.
   Requiring a new stack releasing ammonia.
   Proposed regulation under S4.2 A(1)(a)(iv)

3. Hydrogen technology test facility.
   Four single cell test stands for testing individual cells up to 0.5kW output and three larger short stack test stands for testing stacked cells up to 12kW output.
   Oxygen release.
   Proposed directly associated activity.

4. Boiler replacement.
   Replacement of existing boilers with thermal input of 5.3mW each with new boilers at thermal input 2.98MW each.
   Existing directly associated activity.
   NOx and CO releases.

Johnson Matthey proposed that Project Apollo would be regulated as:

- S4.2 A(1)(c)(viii) [unless falling within any other Section, any manufacturing activity (other than the application of a glaze or vitreous enamel) involving the use of, or the use or recovery of, any compound of any of the following elements – platinum] or
- S6.4 B(a) [Unless falling within Part A(1) or Part A(2) of this Section or Part A(2)(c) of Section 2.1, any process (other than for the re-painting or re-spraying of, or of parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of—

  (i) 20 or more tonnes of printing ink, paint or other coating material which is applied in solid form.

If the Project Apollo process is using a platinum compound in a manufacturing operation, then the operation is likely to be permitted as the S4.2 A(1)(c)(viii) activity. If the only operation carried out in Project Apollo is a coating (rather than manufacture) operation, then the operation is likely to be permitted as the S6.4 B(a) activity. Johnson Matthey must satisfy themselves of the nature of the operation – manufacture or coating – prior to the application for permit variation and apply accordingly.

The application fee for a substantial variation to the existing permit to add a new S4.2 A(1)(c)(viii) activity will be charged at the cost of a new permit application for that activity - £16,466 (Charging Scheme, Reference 1.4.5).

The application fee for a substantial variation to the existing permit to add a new S6.4 B(a) activity would be charged at £1,650 (Charging Scheme, Reference 1.18.2).

Because of the addition of a new stack and release of pollutants such as VOCs, NOx and CO which will require complex assessment, it is more likely that Project Apollo changes would be regulated through addition of a new S4.2 A(1)(a)(viii).

The addition of the PU12 2A operation will be the addition of a new S4.2 A(1)(a)(iv) activity. If this is carried out in conjunction with the existing, S4.2 A(1)(a)(iv) activity (using the same process line for example), this may be charged at the substantial variation charge for an S4.2 activity of £14,819. If the PU12 2A operation is a new process line independent of the existing S4.2 A(1)(a)(iv) activity, it will be permitted as a separate activity charged at the cost of a new permit application for that activity - £16,466 (Charging Scheme, Reference 1.4.5).

Johnson Matthey proposes that the Hydrogen Technology Test Facility be regulated as a Directly Associated Activity (DAA). It must be decided to what scheduled activity this facility would act as a DAA. If it is acting as a DAA to an existing permitted activity in the current permit, then there may be a variation charge appropriate to the variation of that existing activity to incorporate the DAA. If it is acting as a DAA to one of the new scheduled activities being added in the proposed permit variation, then it most probably should be operational alongside that activity. Operating the DAA earlier that the activity to which it is a DAA would have to be discussed further to ensure all permitting requirements are fully addressed. If operating as a stand-alone DAA, it may also require an application fee as defined in Section 1.18.4 of our Charging Scheme. A stand-alone DAA is also defined in the Charging Scheme.

Further charges will be required if the application contains any new management plans requiring Environment Agency assessment (such as noise and vibration management plan or odour management plan). The charges for Environment Agency assessment of these plans are outlined in Table 1.19 of our Charging Scheme (The Environment Agency (Environmental Permitting and Abstraction Licensing) (England) Charging Scheme 2022 (publishing.service.gov.uk)).

Dispersion Modelling

Modelling of emissions to air will be expected to address potential short- and long-term impacts.

Use of Emission Limit Values for Short-Term Assessments.

Johnson Matthey proposes than short-term impacts can be assessed using permitted emission levels and that would be acceptable to the Environment Agency.

Use of Average of Three Years Monitoring for Long-Term Assessments.

Johnson Matthey proposes that long-term impacts can be assessed using the average of monitored emissions for three years. This approach may be used but Johnson Matthey would have to justify it in the application as giving a realistic picture of the impact from potential emissions from the site over that period. For example, not modelling at permitted emission limits could be justified by demonstrating that not all release points are capable of emission together at permitted limits over the course of long-term assessment.

Modelling of Volatile Organic Compounds (VOCs).

It should be noted that releases of volatile organic compounds (VOCs) from new emission points that are created in the proposed permit variation, should be assessed at the lower emission limit values that will be applicable to VOC releases following adoption of the Common Waste Gas Management and Treatment Systems in the Chemical Sector BREF (WGC) which is currently at final draft stage and expected to be issued later in 2023. As the changes outlined in this proposed permit variation application will be implemented after the adoption of the WGC, the stricter VOCs limits will apply to new VOC releases from day one of operation and so emissions must be modelled at these values. Existing VOC emissions can be modelled at existing permitted emission limit values as any stricter limits will not apply for up to four years to existing plant.

Any abatement measures proposed for air emissions in the proposed permit variation must be designed to meet the stricter emission limit values that will apply to VOCs following adoption of the WGC BREF.

As different aspects of the proposed site changes will be implemented at different times over the course of the total project, any air dispersion modelling must take into account not only the final scenario with all proposed changes but also any and all intermediate changes that could result in emissions to air different from that previously assessed in earlier permit variation applications

The air dispersion modelling should also consider any changes to emissions to air as a result of the replacement of the boilers.

Derivation of Emission Limit Values.

There may be substances released to air for which there currently are no environmental assessment levels (EALs) defined in Environment Agency guidance (Air emissions risk assessment for your environmental permit - GOV.UK (www.gov.uk)).

In this case, Johnson Matthey would be expected to derive new EALs following the methodology stipulated in that guidance – "To derive a new EAL, you should use the Environment Agency hazard characterisation method for determining tolerable concentrations in air (TCAs) within section 7 and annex 5 of our 2012 consultation document Derivation of new environmental assessment levels to air. You need to select the option appropriate for the substance and whether the critical effect has a threshold or has no threshold.

We may need to do a further review and consult on your proposals. Therefore, you need to submit your proposal with a sufficiently detailed explanation to explain how you have derived it. We have examples available in Appendix C: summary of toxicological evidence for MEA and NDMA of our 2021 Consultation response document: new EALs for emissions to air.

The application must assess potential impacts on human health and ecological receptors. The ecological receptors which must be considered in this assessment are listed in the attached Habitats Screening document.

BAT/BREF Guidance

Johnson Matthey had proposed that the following guidance be used for technical standards assessment:

- Common Waste Water and Waste Gas Treatment/Management Systems in the Chemical Sector BREF and BAT-C.
- Common Waste Gas Management and Treatment Systems in the Chemical Sector BREF (final draft).
- Large Volume Inorganic Chemicals – Solids (LVIC-S) BREF.
- How to comply with your environmental permit: additional guidance for the inorganic chemicals sector (EPR4.03).

The applicant is advised to consider the technical standards also outlined in the Production of Speciality Inorganic Chemicals BREF (2007).

Applicability of Draft Common Waste Gas Management and Treatment Systems in the Chemical Sector BREF.

The applicant is also advised that the requirements of the Common Waste Gas Management and Treatment Systems in the Chemical Sector BREF, including potentially reduced emission limit values, will apply to all relevant aspects of the proposed permit variation that come into effect and are permitted after adoption of the BREF (currently at draft stage).

The applicant will not have to demonstrate compliance to this draft BREF for site operations that have already been permitted prior to adoption of this draft BREF. There will be a grace period (normally up to four years) before existing plant/operations are subject

to the requirements of this BREF but the applicant should be planning what is required for existing operations to comply with that BREF.

Confidentiality of Application Documentation

When claiming confidentiality for information within the permit variation application, the application should complete the relevant parts of Form F1:

- Section 4: Tick the box if you wish to claim confidentiality for your application.

- Section 6: Provide a supporting letter for any claim that information is confidential.

The letter claiming commercial confidentiality should be submitted with the application.

Environment Agency Core Guidance for the Environmental Permitting Regulations (EPR) outlines the requirements relating to commercial and industrial confidentiality in Chapter 14, Section 14.16 – 14.32 (Environmental permitting: Core guidance (publishing.service.gov.uk)).

Particular attention should be paid to the requirement of the following sections:

- Section 14.18 (*If an operator wants information it considers confidential to be excluded from the register, it should make a request at the time the information is submitted to the regulator, whether as part of an application, as monitoring information or for any other purpose. The operator should provide clear justification for exclusion for each item it wishes to be kept from the register. It will not be enough, for example, merely to assert commercial prejudice: the operator must provide evidence that the confidentiality is provided by law to protect a legitimate economic interest*) and

- Section 14.22 (*The regulator may determine requests only on the basis of the information provided to it. If the information provided does not clearly demonstrate that information should be legitimately protected, the regulator must determine that it is not confidential. The regulator must always determine that information relating to "emissions" must be included on the register (regulation 51(3))*).

Providing further information during the determination process.

During the determination process, it is very likely that the Environment Agency will request the applicant supplies additional information. The applicant may themselves provide further information relevant to the determination – most usually, information that was not fully available at the time the application was originally submitted. Examples of this include updated drawings to reflect changes to the original design that have become apparent during the construction phase of the project.

The additional information provided by the applicant must not change substantially the nature of the application. The Environment Agency Core Guidance for EPR states in Chapter 6, Section 6.8:

- "*A regulator may accept changes to a duly made application where it considers it appropriate. This can include a proposed change in the operator of a new facility. Where the regulator considers the proposed change to be too significant, however, a new application will be required. The implications of changes to an application for the requirements of public participation should always be considered (see chapter 10 on Consultation and public participation) and might indicate either that a new application should be required or that there should be further consultation*".

Risk Assessments

The applicant will be required to submit an assessment of environmental risk for all aspects of the proposed changes. This should be presented in accordance with our guidance, (Risk assessments for your environmental permit - GOV.UK (www.gov.uk)).

These risk assessments can be both quantitative and qualitative in nature.

It should be noted that the applicant must demonstrate to the satisfaction of the Environment Agency at duly making why specific management plans associated with environmental risk are not required to be submitted. This is particularly relevant to risks from noise, odour and fugitive emissions where failure to submit the relevant management plan with the application may result in the applicant having to provide such a management plan within ten days at duly making if the Environment Agency deems it is required and the applicant has not demonstrated the risk does not justify a management plan (and impact assessment in the case of noise).

Johnson Matthey must also consider any change in risk posed by discharges to water or sewer. If the aqueous discharges from the site are changing as a result of this variation, due to for example addition of solutions from air abatement operations, then the composition of the changed discharge to water or sewer must be evaluated and the changes in risk to the environment fully assessed.

You must ensure you provide dates of birth for all appropriate people as per Appendix 1 in form Part A. Failure to do so will delay your application being put into our systems. Please note that these details will not be made available on the Public Register.

A complete application must contain the following information below:

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Payment	Please note your application will not be processed until we receive the full payment.

What happens next?

If you submit an environmental permit application then please quote this pre-application reference number: EPR/BT7086IJ/V018.

If the advice above details using the online digital application form, your application can be submitted using this method. If not, please send your completed application documents via email to:

psc@environment-agency.gov.uk**.**

Please email applications where possible. If email is not possible you can submit by post to:

Environment Agency, Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF

Current application timescales

Our current queues are large and we are taking longer than usual to allocate work for initial assessment, known as duly making. The table below shows our estimated queue times by application type. Please note, this is based on our average times and some applications may be picked up before or after the timescales listed below.

Application type	**Estimated time to allocation**
New bespoke	33-37 weeks
New standard rules	23-27 weeks
Admin variation	20-24 weeks
Minor variation	26-30 weeks
Normal variation	32-34 weeks
Substantial variation	38-42 weeks
Transfer	20-24 weeks
Surrender	19-23 weeks
Medium Combustion Plant	19-23 weeks

Confidentiality and exceptions to disclosure

We note that you have made a claim for exception to disclosure with respect to information submitted as part of this pre-application request. This letter acknowledges receipt of your claim.

All the information you have given us about this pre-application request will not appear on the public register in accordance with our privacy notice. If the Environment Agency were to receive a request to see this information under the Freedom of Information Act 2000 or the Environmental Information Regulations 2004 we would at that point assess your claim to decide if we should treat some of/all the information you have provided as non-disclosable and act accordingly.

If you make an actual permit application in the future and some of the information submitted to the Environment Agency as part of this pre-application request is relevant and needs to form part of that application, it is advisable to resubmit it to us again. This will allow you to make a relevant claim for commercial and industrial confidentiality or national security if you feel it is applicable and will expedite our assessment.

Disclaimer

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to duly making and then full technical checks during determination, and additional information may be required based on your detailed submission and site specific requirements and the advice given is to address the specific pre-application request.

This advice covers installations only.

Other permissions from the Environment Agency and/or other bodies may be required for associated or other activities.

Enhanced pre application cost estimate

At this stage the pre-application advice is expected to cost up to £800 plus VAT. An invoice will be sent separately at a later date.

This pre-application request is now closed.

We consider this pre application request is now closed however if you have any questions regarding this letter please contact John McClean.

If you require additional enhanced pre-application advice please complete our online form.

We look forward to working with you on this project.

If you have any questions please call 03708 506 506.

Yours sincerely

John McClean

John McClean
Senior Permitting Officer
National Permitting Service Part of National Services E&B

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