

[REDACTED]

From: Spence, Neil [REDACTED]
Sent: 01 November 2023 20:33
To: SM-Defra-RESP-notifications (DEFRA)
Cc: May, Emma
Subject: RE: EPR/JP3647JU/A001 – Further Information Required CRM:0644006
Attachments: 11749B (AQ Permit) v0.pdf; 11749 Ecological Assessment Model Files.zip

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Emma,

Please find attached the addendum report and modelling files with commentary below in red text

Please let me know if there are any further queries,

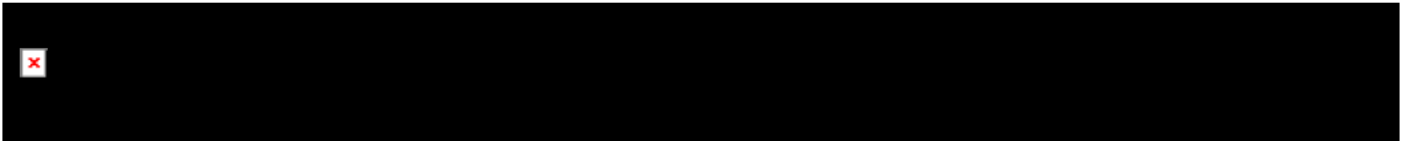
Regards,

Neil Spence
Associate Director

HDR
[REDACTED]

From: SM-Defra-RESP-notifications (DEFRA) <RESP-notifications@defra.gov.uk>
Sent: Thursday, October 19, 2023 1:13 PM
To: Spence, Neil [REDACTED]
Cc: May, Emma [REDACTED]
Subject: EPR/JP3647JU/A001 – Further Information Required CRM:0644006

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Dear Neil

Environmental Permitting (England and Wales) Regulations 2016

Application reference: EPR/JP3647JU/A001

Operator: K D 2 LIMITED

Facility: KLON-06, Slough, SL1 4AN

Thank you for your application received on 30/11/2022 and your subsequent response to our further information request which was received on 03/10/2023.

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

Noise

- You need to send us the Noise Modelling file in the original format which has been used in the latest report (KLON-06 Data Centre, Generator noise assessment, Sharps Redmore, Project No 2221031, 14th September 2023) to predict the specific sound levels in Table 4

Air Quality

Can you please review our guidance and address the following points, updating the modelling and AQA where required:

Modelling Files:

- Provide us with the atmospheric dispersion modelling files (.APL) for all scenarios assessed, for all met data years. Only the .APL files for one met year have been provided with the application. **Attached are the model files, all .APL files are in there for all 5 meteorological years**

Sources:

- Provide the actual and reference oxygen (O₂) and moisture (H₂O) conditions used to calculate emission rates for all combustion sources (S1-S6 MTU generators and S7-S13 Kohler generators). We note that the generator technical data sheets do not provide all of these. **Unfortunately reference conditions were not available for all of the technical data sheets despite numerous requests to multiple manufacturers and suppliers. assumptions had to be made where this was not available and this has been addressed in the report. Where assumptions were made these were conservative to best account for the uncertainties.**

Ecological assessment:

- Include assessment of ammonia slip from the operation of selective catalytic reduction (SCR) on the 7 new diesel generators (S7-S13), including annual ammonia against the ammonia critical level and the contribution of ammonia to nutrient nitrogen and acid deposition. The justification for not including ammonia slip from the SCR appears contradictory, as the exhaust temperatures listed in Table 3.1 of the AQA are greater than 250 °C. We would expect this to be included in the modelling regardless **completed**
- Include assessment of acid deposition at the identified ecological sites. **completed**
- Where PCs at ecological sites are not insignificant please present predicted environmental concentrations (PECs). **Provided**
- There are two local wildlife sites within 2 km that appear to have been omitted from the assessment (Jubilee River and Dorney Wetlands LWS and Railway Triangle LWS). Please can these be considered and included in the assessment. **Included**

We would advise that you review our [air dispersion modelling reports guidance](#) prior to submitting the report.

Please reply directly to this email with your information and copy in Emma.May@environment-agency.gov.uk

Please send the information within 10 working days of this letter.

If we do not receive the information within 10 working days we will return your application.

If we do receive the requested information within 10 working days, 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 we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the correct application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

In addition to the above information required, please note that should the application reach the Determination stage you will be asked to provide the following additional information relating to the Air Quality Assessment:

Sources:

- Review the use of jet sources for the existing horizontal release emission points (S1-S6). When modelling jet sources the model does not account for building downwash and due to the proximity of human health receptors this is not deemed suitable.
- To confirm that the fuel used is low sulphur diesel.

Human health assessment:

- Include assessment against the Nitrogen Monoxide (NO) environmental assessment levels (EALs) as required in our air emission risk assessment guidance.
- Present the process contributions (PCs) against the standard percentile (99.79 th) for 1-hour NO2 and then present results of statistical analysis, if needed. We need PCs to be presented before you undertake statistical analysis.
- Explain your probability and statistical analysis approach further. With the current information we are unable to understand the steps you have taken and unable to replicate their process.

If you have any questions regarding this application, please do not hesitate to use my contact details below to discuss this further.

Kind regards,

Emma May Bsc MRes

Senior Permitting Officer, Installations

Environment Agency | Kings Meadow House, Kings Meadow Road, Reading, RG1 8DQ

Mobile: [REDACTED]

Working days: Monday to Thursday 09:00 to 15:00

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