

From: [Joyce, Darren](#)
To: [Raynes, Graham](#)
Cc: [Henderson, Kevin](#); [Wright, Colin](#)
Subject: RE: [EXTERNAL] RE: Tradebe Hendon
Date: 06 September 2023 14:44:27
Attachments: [image001.gif](#)
[image002.gif](#)
[image003.gif](#)
[image004.gif](#)
[image005.gif](#)
[image006.png](#)
[Hendon Dock - Air quality assessment Issue 1.pdf](#)
[IMS Framework Sunderland Rev 1.0.docx](#)
[S-LY001_AE.pdf](#)
[S-LY163.pdf](#)
[A113.P.D.001_Rev02 PFD.pdf](#)
[BAT for Boiler use for VOC Destruction .docx](#)
[Response summary Action 01.pdf](#)

You don't often get email from darren.joyce@tradebe.com. [Learn why this is important](#)

Hi Graham,

Thank you for response and please see below and attached information required:

- **Risk Assessments**
Please see attached documents:
BAT for Boiler use for VOC Destruction
A113.P.D.001 Rev02 PFD
Hendon Dock – Air quality assessment Issue 1
- **EMS**
Please see attached document:
IMS Framework Sunderland Rev 1.0
- **Site Plan**
Please see attached documents:
S-LY001_AE
S-LY163
- **BAT Assessment**
Please see attached documents:
BAT for Boiler use for VOC Destruction
Response summary Action 1 (includes appropriate measures review)
- **Habitats Assessment**
No problem. How best to facilitate payment to avoid any delay?
- **Storage Activity**
Project has facilitated removal of older tank farm storage.
Replaced by upgraded tank farm storage.
Total balance has reduced storage DAA by 18 m³.

I trust these documents fulfil all requirements below and look forward to speaking soon.

KR Darren.

Darren Joyce

UK SHEQ Manager
Tradebe Chemicals

T: +44 (0) 1797 228 214

F: +44 (0) 1797 226 724

M: +44 (0) 7748 621 685

E: darren.joyce@tradebe.com

www.tradebe.co.uk

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 01 September 2023 19:18

To: Joyce, Darren <darren.joyce@tradebe.com>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>

Subject: RE: [EXTERNAL] RE: Tradebe Hendon

Hi Darren,

Apologies for the late reply.

I've completed the duly made checks for the S4 variation application and the following points need addressing – consider this a draft for discussion as some points need confirming before this can be finalised.

Risk Assessments

There is no assessment of the emissions from the new S4 line and the performance of the upgraded abatement system/boiler – this is required in accordance with our H1 assessment methodology so that we can assess the impact on the environment and compliance with applicable BAT-AELs - see [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)

If detailed air dispersion modelling is required please refer to our guidance here [Environmental permitting: air dispersion modelling reports - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports)

EMS

We need a summary of the EMS – please provide a summary in accordance with [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits)

Site Plan (Appendix 1 - S4 Plant Layout.pdf)

Please provide an update site plan which shows the following:

- Site permit boundary identified (usually in green)
- Site emission points are shown and labelled
- Identifies other geographic features (roads, rivers etc)
- OS NGR indicated

See <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits> for further guidance.

BAT Assessment (Appendix 5)

The assessment provided is a summary against the Waste Treatment BATCs and Common Wastewater and Waste Gas Treatment (CWW) Document. We are applying the requirements of the *Chemical waste: appropriate measures for permitted facilities* guidance found here: [Chemical waste: appropriate measures for permitted facilities - 1. When appropriate measures apply - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/chemical-waste-appropriate-measures-for-permitted-facilities-1-when-appropriate-measures-apply) Please provide a summary of your proposal against the applicable parts of the Appropriate Measures.

One point has been brought to my attention regarding the acceptance and treatment of halogenated wastes (as listed in Appendix 3 of the Main Document). The Waste Treatment BATCs suggests that “recirculation of process off-gases in a steam boiler may not be applicable to the treatment of halogenated solvent wastes, in order to avoid generating and emitting PCBs and/or PCDD/F.” Please also provide additional detail on how you will address this requirement as well.

Fees and Charges

A habitats assessment fee is required (Table 1.19, line 1.19.2 of the charging scheme) is required: £779.

It is not clear what the changes are to the storage activity – it appears several tanks have or are being removed and new ones installed. This may constitute a new S5.6 Part A(1)(a) activity if an increase of over 50 tonnes capacity. Please confirm the change in storage capacity at the site (in terms of quantity removed, quantity being added and the impact on the overall storage quantities held on site). This may impact the additional fee required.

See: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

I’m happy to discuss with you on whenever is convenient – I’m available all next week, barring a few meetings.

Best Regards
Graham

Graham Raynes

Senior Permitting Officer, National Permitting Service - part of National Services E&B
Environment Agency | Richard Fairclough House, Knutsford Road, Warrington WA4 1HT

graham.raynes@environment-agency.gov.uk

External: **020302 50600**

Internal: **30600**

Help us to improve our service and complete our customer survey – click <http://www.smartsurvey.co.uk/s/NPScustomer/>



From: Joyce, Darren <darren.joyce@tradebe.com>

Sent: 01 September 2023 08:30

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>

Subject: Re: [EXTERNAL] RE: Tradebe Hendon

You don't often get email from darren.joyce@tradebe.com. [Learn why this is important](#)

Hi Graham,

Any update please?

Kr Darren.

Sent from [Outlook for Android](#)

From: Joyce, Darren

Sent: Thursday, August 24, 2023 11:49:18 AM

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>

Subject: RE: [EXTERNAL] RE: Tradebe Hendon

Hi Graham,

Thanks for update- it is most appreciated.

Please do not hesitate to contact us directly should there be any assistance required.

I trust we are still on track for Duly Made status this week?

KR Darren.

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 18 August 2023 15:53

To: Joyce, Darren <darren.joyce@tradebe.com>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>

Subject: RE: [EXTERNAL] RE: Tradebe Hendon

Hi Darren,

I will be picking this up for duly making next week – I'll be in touch as soon as I can.

Best Regards

Graham

From: Joyce, Darren <darren.joyce@tradebe.com>

Sent: 16 August 2023 15:27

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin

<colin.wright@tradebe.com>

Subject: RE: [EXTERNAL] RE: Tradebe Hendon

You don't often get email from darren.joyce@tradebe.com. [Learn why this is important](#)

Thanks Graham,

We are scheduled to complete end of September and be in a position to recover waste solvent.

Please can you provide any update at all as to when we may get to Duly Made status given this timeframe, please?

Your support is most appreciated.

KR Darren

From: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Sent: 09 August 2023 16:13

To: Joyce, Darren <darren.joyce@tradebe.com>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>

Subject: [EXTERNAL] RE: Tradebe Hendon

CAUTION: Email originated from outside of TRADEBE. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Darren,

I've flagged the variation up as extremely urgent to our Team Leader group and they are looking at the situation – I'm sorry not to have any more news but I will keep chasing this for you.

Best Regards

Graham

From: Joyce, Darren <darren.joyce@tradebe.com>

Sent: 08 August 2023 09:01

To: Raynes, Graham <graham.raynes@environment-agency.gov.uk>

Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>

Subject: RE: Tradebe Hendon

You don't often get email from darren.joyce@tradebe.com. [Learn why this is important](#)

Hi Graham,

Are we OK for a catch up on S4 variation yet, please?

KR Darren

From: Joyce, Darren
Sent: 11 July 2023 16:32
To: graham.raynes@environment-agency.gov.uk
Cc: Henderson, Kevin <kevin.henderson@tradebe.com>; Wright, Colin <colin.wright@tradebe.com>
Subject: Tradebe Hendon

Hi Graham,

Thank you for meeting on 30th June we found it very productive.

Have there been any developments on our S4 variation at Hendon Dock, please?

We could catch up directly on Teams if this is amenable.

Kr Darren

Darren Joyce

UK SHEQ Manager
Tradebe Chemicals

T: +44 (0) 1797 228 214

F: +44 (0) 1797 226 724

M: +44 (0) 7748 621 685

E: darren.joyce@tradebe.com

www.tradebe.co.uk

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else. We have checked this email and its attachments for viruses. But you should still check any attachment before opening it. We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.