

**From:** [Wright, Colin](#)  
**To:** [Raynes, Graham](#)  
**Cc:** [Joyce, Darren](#)  
**Subject:** RE: [EXTERNAL] RE: Tradebe Hendon  
**Date:** 13 September 2023 16:50:00  
**Attachments:** [image001.gif](#)  
[image002.gif](#)  
[image003.gif](#)  
[image004.gif](#)  
[image005.gif](#)  
[image006.png](#)  
[FW EXTERNAL RE VOCs after boiler.msg](#)

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Hi Graham

Attached are the modelling files that accompany the Air Quality Assessment (Socotec)

I will get the definitive statements on halogenated wastes soon as possible tomorrow.

For the habitats payment I believe we will need an invoice raising to match a Purchase Order for Electronic Transfer. .

Best regards. Colin

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**From:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Sent:** 12 September 2023 16:25  
**To:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>  
**Subject:** RE: [EXTERNAL] RE: Tradebe Hendon

Darren,

Thanks for the attached - I have gone through them - just a couple of things to look at and then we can duly make this.

I can't see anything which covers the issue of potential treatment of halogenated wastes via the off-gases to the boiler.

Please also supply the modelling files that accompany the Air Quality Assessment – our specialists will need to use these to audit the report.

Regarding payment – the options are covered on the attached F1 form: [Form EPF: Application for an environmental permit – Part F1 Charges and declarations \(publishing.service.gov.uk\)](#). Let me know if you want PSC to contact you for card payment and I'll get them to ring you.

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](mailto:graham.raynes@environment-agency.gov.uk)

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**From:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>

**Sent:** 06 September 2023 14:41

**To:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>

**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>

**Subject:** RE: [EXTERNAL] RE: Tradebe Hendon

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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 m<sup>3</sup>.

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

KR Darren.

**Darren Joyce**

UK SHEQ Manager

Tradebe Chemicals

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**From:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>

**Sent:** 01 September 2023 19:18

**To:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>

**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto: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 \(www.gov.uk\)](http://www.gov.uk)

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

EMS

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

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 \(www.gov.uk\)](#) 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](mailto:graham.raynes@environment-agency.gov.uk)

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**From:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>  
**Sent:** 01 September 2023 08:30  
**To:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>  
**Subject:** Re: [EXTERNAL] RE: Tradebe Hendon

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Hi Graham,

Any update please?

Kr Darren.

Sent from [Outlook for Android](#)

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**From:** Joyce, Darren  
**Sent:** Thursday, August 24, 2023 11:49:18 AM  
**To:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto: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.

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**From:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Sent:** 18 August 2023 15:53  
**To:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto: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

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**From:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>  
**Sent:** 16 August 2023 15:27  
**To:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>  
**Subject:** RE: [EXTERNAL] RE: Tradebe Hendon

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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

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**From:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Sent:** 09 August 2023 16:13  
**To:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>  
**Subject:** [EXTERNAL] RE: Tradebe Hendon

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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

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**From:** Joyce, Darren <[darren.joyce@tradebe.com](mailto:darren.joyce@tradebe.com)>  
**Sent:** 08 August 2023 09:01  
**To:** Raynes, Graham <[graham.raynes@environment-agency.gov.uk](mailto:graham.raynes@environment-agency.gov.uk)>  
**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>  
**Subject:** RE: Tradebe Hendon

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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](mailto:graham.raynes@environment-agency.gov.uk)

**Cc:** Henderson, Kevin <[kevin.henderson@tradebe.com](mailto:kevin.henderson@tradebe.com)>; Wright, Colin <[colin.wright@tradebe.com](mailto:colin.wright@tradebe.com)>

**Subject:** Tradebe Hendon

Hi Graham,

Thank you for meeting on 30<sup>th</sup> 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

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