14 February 2025

Attention: Patrick Zheng
Environment Agency
Manley House,
Kestrel Way,
Exeter,
EX2 7LQ

SLR Project No.: 410.064951.00001

EA Reference No.: EPR/KP3320LH/A001

## RE: Letter Response to Application Bespoke A001 RFI Letter 1 - (03.02.2025) – EPR/KP3320LH/A001

**Application Reference**: EPR/KP3320LH/A001
**Operator**: Agilent Technologies LDA UK Limited
**Facility:** Agilent Technologies LDA UK Limited

Dear Patrick,

Please find below Agilent's response to the request for information (RFI)[1] issued by the Environment Agency (EA) on 03 February 2025.

### 1. Part B6 Form.

*As you have indicated that your installation includes point source emissions to sewer, you will also need to complete application form part B6 and submit this to us. Please also clarify whether these emissions will go to a wastewater treatment plant.*

Please find attached the Part B6 form[2] for the application. Emissions of 'process cooling and equipment wash water' are discharged to a Severn Trent wastewater treatment plant via public sewer.

### 2. Company Secretary Contact Details | Part F1 Form Section 5

*Please provide a contact number and email address for the Company Secretary James Wright. We will need this to send formal requests for information and when issuing the permit.*

**Redacted**

### 3. H1 Screening Tool

*Confirm whether you used the Environment Agency's H1 Assessment tool to undertake the air emissions risk assessment. If so, please provide a copy of the tool.*

*If you carried out the H1 calculations using an alternative tool (e.g. Excel) please provide a copy.*

SLR has prepared its own assessment tool[3] (see attached) to assess emissions to air. This tool is in alignment with the principles of the H1 Assessment Tool.

[1] Application Bespoke A001 RFI Letter. EPR/KP3320LH/A001 dated 03 February 2025.
[2] 410.064951.00001 Application Form Part B6.
[3] 410.064951.00001 410.064951.00001 Aglient_AREA_H1 Screen_EA COMMERCIALLY SENSITIVE

**Part of Response Redacted**

## 4. Activities and charges

*We are unable to check the application fee until we receive more information on your process. Table 5-1 of the BATOT document indicates that there are:*

- *4 reactors that undertake polymerisation reactions*
- *1 reactor undertaking sulphonation reactions, and*
- *1 reactor undertaking quaternisation reactions.*

*Section 1.4 of the BATOT document implies silica particles are simply loaded into tubes with polymer particles. However, Table 5-2 shows a 10-litre vessel for 'polymerisation silica base' and several for 'silica particle processing'.*

*Figure 1 of the BATOT document shows reactions at stage 1 'free radical polymerization' but also 'surface modification reaction to change particle chemistry'.*

*We need to be clear where in the process chemical reactions are occurring.*

*Please therefore clarify the following points, providing further details on any chemical reactions and identifying the relevant process step/reactor where relevant:*

*a) Are you, and if so, how are you are making silica polymers? Or is silica particles solely used as an additive?*

**Response Redacted**

*b) Clarify what is meant by 'free radical polymerization'.*

**Response Redacted**

*c) Clarify what is meant by 'surface modification reaction to change particle chemistry'.*

**Response Redacted**

*d) Does magnetic particle production involve a chemical reaction?*

**Response Redacted**

*e) Which process steps involve sulphonation and quaternisation reactions?*

**Response Redacted**

*f) Are there chemical reactions occurring at any other stages of the process?*

**Response Redacted**

# Closure

If you have any further questions, please do not hesitate to get in touch.

Regards,

**SLR Consulting Limited**

**Lisa Brookes**
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Attachments 410.064951.00001 Application Form Part B6.

410.064951.00001 410.064951.00001 Aglient_AREA_H1 Screen_EA COMMERCIALLY SENSITIVE

cc Tim Graves, Agilent - tim.graves@agilent.com