

**From:** [Di Stefano, Francesco](#)  
**To:** [Shadlock, Rebecca](#); [Graham, Angela](#)  
**Cc:** [Taylor, Mark](#); [SM-Defra-RESP-notifications \(DEFRA\)](#)  
**Subject:** Application Bespoke EPR/AP3328SQ/A001 We Need More Information About Your Application and Additional Payment 04112024 CRM:0227045  
**Date:** 04 November 2024 14:32:00  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)  
**Importance:** High

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## Environmental Permitting (England and Wales) Regulations 2016

**Application reference: EPR/AP3328SQ/A001**

**Operator: H2 TEESSIDE LIMITED**

**Facility: H2Teesside, Land at & in vicinity of former Redcar Steel Works, Redcar & in Stockton-on-Tees, Teesside, TS10 5QW**

Dear Rebecca and Angela,

Many thanks for the additional information provided and payment (subject to confirmation). We have reviewed the additional information and we can confirm that we consider significant progress has been made, however there are still some aspects of the application that need further information and/or payment to complete the duly making process. Please provide the following information / payment:

- 1. Additional activities and associated charges.** From a review of the process flow diagrams submitted with the additional information, we have identified the following additional regulated activities:
  - Physico-chemical treatment for disposal of non-hazardous waste (oil separation and neutralisation of stormwater) – Likely to be an additional separate activity S5.4 Part A (1) (a)(ii) according to the drawing provided. **Outstanding application charge: £1344.30**
  - Biological treatment for disposal of non-hazardous waste (additional denitrification stage shown downstream of ‘Media Filtration’ in UFD titled ‘Wastewater Treatment 2 (NZT Option), number 00-PR-UFD-00004) and referred to in technical note for water treatment - Likely to be an additional separate activity S5.4 Part A (1)(a)(i). **Outstanding application charge: £ 1398.40**

In a call on 29/10/2024 we agreed that you needed more time to review whether these additional activities are actually included in the application, or they are shown in the process flow diagrams as the result of a superseded design concept.

Please:

- a. Advise the outcomes of this review, along with the supporting explanation of changes that might have occurred to the design, if these activities are not included.
- b. Update Appendix P H2TS Proposed Activities/Fees Revised if these additional activities are confirmed.
- c. Pay the outstanding application charges if these additional activities are confirmed.

2. Please advise whether the **additional payment of £8,314.40** has been made already and provide remittance/reference number so we can track it in our systems.
3. Provide an **updated application form Part B3** or confirm no changes to previously submitted version – This form has not been updated.
4. **Ref. Question 2 c. - Appendix C – CWW BAT conclusions 9 and 12** – Confirm there is not any text missing from these references, as there appears to be two bullet point without any text.
5. **Ref. Question 7 – Process Flow Diagrams** - Provide a drawing key for the process flow diagrams submitted with the additional information.
6. **Ref. Question 4 – Site Grid References** - The site central point still falls beyond the proposed installation's boundaries. Please double check and amend as applicable.
7. **Ref. Question 13 – Point Source Releases to Water – Item a.**
  - a. Clarify whether your proposal is to have the updated water quality model, that you anticipate will be available by 31/01/2025 submitted and assessed as part of this determination, or as part of the pre-operational condition referred to in Q9a.
  - b. If the proposal is to have the updated model to be submitted by 31/01/2025 and assessed as part of this permit application determination, clarify whether the modelling update in pre-operational conditions referred to in Q9a will be aimed at capturing further changes and updates beyond those anticipated to be captured by 31/01/2025.
  - c. Note and acknowledge that any environmental risk updates intended to be submitted as pre-operational conditions will be subject to the need for a variation of the permit (if this is granted), should they show that the environmental risk has increased compared to the risk envelope approved at the point of granting the permit, including, but not limited to, instances where the need for stricter emission limits or new emission limits for pollutants previously not considered was to be identified; or if there are significant changes to the operating techniques proposed to manage and mitigate the risks.
  - d. For us to assess whether the proposal to receive an updated marine dispersion model in January 2025 would be acceptable:
    - i. Explain the nature/reasons for this update and provide as many details as possible on what is expected to change compared to the current assessment.
    - ii. Explain whether you consider that the assessment submitted at this stage is conservative, i.e. it is likely to provide a reasonably conservative risk envelope and whether you expect changes to the conclusions.
    - iii. Acknowledge that any updates might entail the need for re-consulting internal and external stakeholders on your application and that you accept you might incur in additional charging for changing your application before it has been determined, as specified by our charging scheme and associated guidance (refer to 2.10 of [Environmental permits: when and how you are charged - GOV.UK](#)).

8. **Ref. Question 13 – Point Source Releases to Water – Item c.i.** – The technical note should clearly state how values have been derived, and we still do not feel this is clear yet. It appears to be based on assumptions from plant design, but we don't think this is clearly / explicitly stated as such. Please expand the technical note to better explain how emission values have been derived and to provide a more detailed narrative supporting the interpretation of the Excel workbook calculations you have submitted to accompany the technical note.

Any other technical questions will be raised during the determination of the application, as they emerge out of a more detailed assessment.

We will cover confidentiality issues in separate communications, along with the assessment of the pending commercial confidentiality claim, after the application is duly made.

Please provide the **additional information and payment by 19/11/2024**. Please do not hesitate to get in touch if you have any questions or need to discuss any of the outstanding queries.

Best Regards

**Francesco Di Stefano** CEng MIChemE  
Principal Permitting Officer, Installations, National Permitting Service  
**Environment Agency** | Horizon House, Deanery Road, Bristol, BS1 5AH

[francesco.distefano@environment-agency.gov.uk](mailto:francesco.distefano@environment-agency.gov.uk)

External: 020 847 45726

Internal: 25726

Mobile: 07384 876550

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**From:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>

**Sent:** 11 October 2024 21:06

**To:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>; Di Stefano, Francesco <[Francesco.DiStefano@environment-agency.gov.uk](mailto:Francesco.DiStefano@environment-agency.gov.uk)>

**Cc:** Shadlock, Rebecca <[rebecca.shadlock@bp.com](mailto:rebecca.shadlock@bp.com)>; Taylor, Mark <[mark.taylor@environment-agency.gov.uk](mailto:mark.taylor@environment-agency.gov.uk)>

**Subject:** RE: Application Bespoke EPR/AP3328SQ/A001 We Need More Information About Your Application and Additional Payment 07082024 CRM:0227045

Francesco

Below is a link to download the documents which make up our response to the request for information – I will also issue as a share from Onedrive, if you could confirm that you have been able to successfully download the information, that would be appreciated.

In terms of the response, please note:

- All documents have been uploaded individually for ease of distribution within the PSC team.
- We have updated several documents and forms from the original application – please ensure the original documents are superseded with the recent revised versions.
- We have updated the air quality assessment, and this is supported by updated modelling files. Modelling files have also been provided for the CO2 venting assessment and water quality assessment.
- We have had some updated information on flows in relation to water quality this week which has adjusted our review of the listed activities. An updated table is provided in Appendix P in relation to this. Payment is being made by BACs transfer and when I get confirmation of the transfer, I will forward this for ease of tracking on your system.

If there are any queries, then please do not hesitate to contact Rebecca or myself.

Regards

Angela

**Angela Graham** MSC, BSc, MICWM, MIIRSM

Associate, Permitting - EHS, UK & Ireland

M +44 (0) 7920825530

[angela.graham@aecom.com](mailto:angela.graham@aecom.com)

[Click here to connect with me on LinkedIn](#)

Please note my annual leave dates are:

6<sup>th</sup> – 23<sup>rd</sup> September 2024 inclusive

**AECOM**

12 Regan Way

Chetwynd Business Park

Chilwell, Nottingham

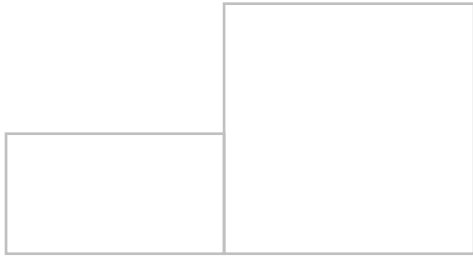
NG9 6RZ, United Kingdom

T +44-(0) 1159 077000

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**From:** SM-Defra-RESP-notifications (DEFRA) <[RESP-notifications@defra.gov.uk](mailto:RESP-notifications@defra.gov.uk)>  
**Sent:** Wednesday, August 7, 2024 11:15 AM  
**To:** Rebecca Shadlock <[Rebecca.Shadlock@bp.com](mailto:Rebecca.Shadlock@bp.com)>  
**Cc:** Graham, Angela <[angela.graham@aecom.com](mailto:angela.graham@aecom.com)>; Di Stefano, Francesco <[Francesco.DiStefano@environment-agency.gov.uk](mailto:Francesco.DiStefano@environment-agency.gov.uk)>; Taylor, Mark <[mark.taylor@environment-agency.gov.uk](mailto:mark.taylor@environment-agency.gov.uk)>  
**Subject:** Application Bespoke EPR/AP3328SQ/A001 We Need More Information About Your Application and Additional Payment 07082024 CRM:0227045

Dear Rebecca

## **Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/AP3328SQ/A001**

**Operator: H2 TEESSIDE LIMITED**

**Facility: H2Teesside, Land at & in vicinity of former Redcar Steel Works, Redcar & in Stockton-on-Tees, Teesside, TS10 5QW**

Thank you for your application received on 14/06/2024. We need more information and additional payment on your application. Please refer to the attached letter for details.

Please acknowledge receipt of this email and do not hesitate to contact me if you have any questions.

Yours sincerely,

**Francesco Di Stefano** CEng MChemE

Principal Permitting Officer, Installations, National Permitting Service

**Environment Agency** | Horizon House, Deanery Road, Bristol, BS1 5AH

[francesco.distefano@environment-agency.gov.uk](mailto:francesco.distefano@environment-agency.gov.uk)

External: 020 847 45726

Internal: 25726

Mobile: 07384 876550





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