

Reynolds, Meghan P

From: Brian Bennett <brian_bennett@venatorcorp.com>
Sent: 26 July 2019 10:38
To: DiStefano, Francesco P; PSC Land
Subject: EPR/TP3532PK/V010 - Request for additional information
Attachments: TP3532PK - Uses of steam at Greatham - 24.07.19_rev 1.docx; Form C2 - Application Form - TP3532PK - 24.07.19 - rev.1.pdf; Form F1 - Application Form - TP3532PK - 24.07.19 - rev.1.pdf; TP3532PK - Cochrans Boilers Tender Proposal - 08.11.18.doc; TP3532PK - PID Connection of Services to new Boilers - 24.07.19.pdf; TP3532PK - Process Flow Diagram - 24.07.19_Rev O1.pdf

Categories: Meghan

Dear Francesco,

Please find attached some of the additional information you requested:

1. **Type of application - Type of application** - Revised C2 and F1 Forms attached
2. **Operating techniques**
 - a. Provide process flow diagram(s) for the new boilers and their integration within the existing steam distribution system. – Process Flow Diagram and PID Connection of Services documents attached
 - b.
 - c. Provide an outline explanation of the uses of steam in the system (e.g. list of main users, type – steam turbines, process heating medium, etc.) and describe scenarios when peak steam use/generation is foreseen (i.e. Scenario 1 of the Air Dispersion Model) – Summary document 'Uses of steam at Greatham' attached. This includes some comments on the likelihood of the peak steam scenario used in the ADMS calculations
 - d.
 - e. Provide documentation showing that the specification and / or guaranteed emissions of the new boilers (for example manufacturer's process duty specification or data sheet with emission data) – Cochrans Boiler Tender Proposal attached. Only Section 1 of the proposal has been included as I believe that this covers the relevant information.

EED Article 14 Cost Benefit Analysis (document titled: 'Technical Note: Cost Benefit Analysis')

- a. Clarify the figure used of £3.537/MWh, for the assumed price of purchase of heat from the network: show the precise source from where this figure has been taken. Clarify the conversion of this figure to £1982/TJ, noting that a figure of £983/TJ has been used in the assessment. Amend the figure if appropriate. – This information has been requested from the project contractor who carried out the assessment.
- b.
- c. Clarify the source for the figure used for the cost of district heating pipework (£1,500/m) and confidence levels in this figure (e.g. engineering estimate from other projects, etc.); as discussed, this item may be followed up after duly making your application – This information has been requested from the project contractor who carried out the assessment.
- d.
- e. Clarify whether you consider that any information provided in the document titled: 'Technical Note: Cost Benefit Analysis' is commercially confidential – Venator does not consider this Cost Benefit Analysis document as commercially confidential.

I will forward the District Heating information as soon as I receive it. If you need any further information, please don't hesitate to contact me.

Best Regards
Brian

Brian Bennett
Sustainability Manager

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From: DiStefano, Francesco P <Francesco.DiStefano@environment-agency.gov.uk>
Sent: 22 July 2019 10:02
To: Brian Bennett <brian_bennett@venatorcorp.com>
Subject: Application- Variation - Request for additional information to duly make the application
Importance: High

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Dear Brian,

We need more information about your application
Application reference: EPR/TP3532PK/V010
Operator: Venator Materials UK Limited
Facility: Greatham Works

Thank you for your application received on 30/04/2019. The following is to confirm our conversation of 22/07/19.

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

1. Type of application

Based on the initial review of your application for duly making purposes, we consider the correct application type is for 'a substantial variation'. You have paid the correct application charge for a substantial variation (90% of ref. 1.10.1 - Section 1.1 - combustion plant - rated thermal input of 50MWth or more = £17,193 + 1.19.2 Habitats assessment = £779). However, you have applied for a normal variation, according to the application forms. Resubmit amended form Part C2 and Part F1 filled for a substantial variation.

2. Operating techniques

- a. Provide process flow diagram(s) for the new boilers and their integration within the existing steam distribution system. Provide an outline explanation of the uses of steam in the system (e.g. list of main users, type – steam turbines, process heating medium, etc.) and describe scenarios when peak steam use/generation is foreseen (i.e. Scenario 1 of the Air Dispersion Model);
- b. Provide documentation showing that the specification and / or guaranteed emissions of the new boilers (for example manufacturer's process duty specification or data sheet with emission data);

3. **EED Article 14 Cost Benefit Analysis** (document titled: 'Technical Note: Cost Benefit Analysis')

- a. Clarify the figure used of £3.537/MWh, for the assumed price of purchase of heat from the network: show the precise source from where this figure has been taken. Clarify the conversion of this figure to £1982/TJ, noting that a figure of £983/TJ has been used in the assessment. Amend the figure if appropriate.
- b. Clarify the source for the figure used for the cost of district heating pipework (£1,500/m) and confidence levels in this figure (e.g. engineering estimate from other projects, etc.); as discussed, this item may be followed up after duly making your application;
- c. Clarify whether you consider that any information provided in the document titled: 'Technical Note: Cost Benefit Analysis' is commercially confidential.

Please send the information, quoting the above application reference, to:

psc@environment-agency.gov.uk.

copying myself.

Please send the information **as soon as practically possible** and however within 10 working days of this letter. Please contact me if you have problems with responding to the questions above within this timeframe. If we don't hear from you, we must return your application.

When we receive the requested information, 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. During determination we will assess your application in detail and we may need to request further information according to the findings of our assessment.

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 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-permitting-ep-charges-scheme>
We'll assess your claim for confidentiality, if applicable, once your application is duly made.

If you have any questions please do not hesitate to phone me on the contact details below.

Yours sincerely

Francesco Di Stefano CEng MICHemE

Senior Permitting Officer, Regulated Industry Team, National Permitting Service

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