

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 April 2023 11:25  
**To:** steven.foster2@drax.com  
**Cc:** [REDACTED]  
**Subject:** Further information and outstanding payments required for completion of Duly Making checks on application EPR-VP3530LS-V022

Dear Steven,

We have reviewed all the information you provided regarding the outstanding Stage 1 information and the Stage 2/3 submission information.

We have the following outstanding information requirements for the **Stage 1 application submission**:

1. H1 tool file

In your email to Miriam of 11/04/2023 you said you had uploaded the H1 tool file to the Sharepoint site. We don't have access to your Sharepoint site, *we need you to provide a link to the site so that we can access and download the H1 tool file.*

2. Process water feed to the effluent treatment plant

Thank you for providing a Process Water Block Diagram and a block flow diagram for the wastewater treatment facility in Figure 5 of part 5.9.1 of the Second Stage Information report with your emails of 03/04/2023.

Both diagrams show the only wastewater feed to the waste treatment facility is from the quencher/direct contact cooler upstream of the CO<sub>2</sub> absorption system.

Section 2 of the supporting information report submitted with the application (which is also included in the Non-Technical Summary submitted 12/04/2023) includes a Process Block Flow Diagram for Post-combustion Carbon Capture System which shows an additional process water link to the wastewater treatment facility. This additional process water link shows process water coming from the solvent regeneration system to the wastewater treatment facility.

*We need you to describe the nature of this process water, whether there is the potential for this water to be contaminated with substances, what these substances are and how they will be treated.*

If there are new substances, for example amines, in this process effluent this will have an impact on your assessment of the discharges to water from the wastewater treatment facility. We may not be able to accept your assessment of the water discharge if there are new substances for which we require dispersion modelling in the receiving waters.

3. Air quality impact assessment (AQIA)

You have provided an updated AQIA on 03/04/2023. Appendix A of the updated AQIA makes several references to sections of a report and other appendices which we have not received.

- Section 1.2.1 states:  
'Results pertaining to the amine chemistry sensitivity testing are presented in Tables 1.23 (MEA) and 1.24 (NDMA). The grid receptor reporting the maximum modelled process contributions are presented, based on the results of modelling completed for low and high range values relating to the atmospheric reaction kinetics detailed in Table 1.8 of **Appendix 6.3 (Atmospheric Dispersion Modelling)** (APP-127) for the proxy compounds.
- Section 1.2.2 states  
As stated in **Table 1.8 of Appendix 6.3 (Atmospheric Dispersion Modelling)**, amine sensitivity modelling was based on initial design mass emission data that is no longer representative of the proposed BECCS plant.
- Section 1.3 states:

'IMPACTS ON HUMAN RECEPTORS (WITH MITIGATION) Equivalent results tables are presented below for the core model scenarios and sensitivity testing scenarios (worst case emissions profile), inclusive of all mitigation measures outlined in Section 6.10 of Chapter 6 (Air Quality) as updated by Air Quality Technical Note 2 (document reference 8.9.5).

We have not received the referenced reports or appendices. *We need you to submit these documents to complete our Duly Making checks for the AQIA.*

4. Amendments required for the Second Stage Information report submitted 03/04/2023
  - a. The footnote on the front page of the report states: CONFIDENTIAL. Please remove this footnote as we need to place the report on the Public register.
  - b. The contents section numbers are not in keeping with the document section numbers and makes referencing sections of the document confusing. Please update the contents page to match the document.

*Please amend and provide an updated version of the Second Stage Information report.*

We also require the following additional information for the Stage 2/3 application submission:

5. CO<sub>2</sub> Venting assessment

You have provided a description of the high-pressure CO<sub>2</sub> venting dispersion modelling in section 4.0 of the Second Stage Information report (submitted 03/04/2023).

We need the modelling input files and/or input data to complete the Duly Making checks for this assessment. *Please provide the modelling input files and/or input data for the Phast modelling of the high-pressure CO<sub>2</sub> venting.*

Please provide the outstanding information detailed above by the 4<sup>th</sup> of May 2023. If we do not receive the information by this date, we will not do any further work on your application.

To Duly Make your application we also require payment of our invoices which are over 30 days unpaid or confirmation that this payment will be made by 04/05/2023.

The outstanding invoices and amounts are:

- invoice 268736 £3,380 for January 2023
- invoice 309721 £2,675 for February 2023.

We will also need to have received payment for any outstanding enhanced pre-application fee. We will check and confirm if there are any outstanding fees and confirm this early next week.

If you have any queries or would like to discuss the outstanding requirements please contact [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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