From: "Devine, Fiona" <fiona.devine@environment-agency.gov.uk>
Sent: Thursday, 21 December 2023 17:31
To: "Joanne Dodson" <Joanne.Dodson@sunderland.gov.uk>
Subject: ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016 - AESC UK No 2 Plant
Attachments: Disaggregated BAT conclusions and IG (STS) RG Approval.pdf

Hi Joanne,

Application for an A2 environmental permit to operate an installation at AESC UK No 2 Plant, 1 International Drive, Sunderland, SR5 3FH.

This application has been passed to me for comment and/or to offer my support in permitting. Seems it got lost in our system. I hope you find my comments helpful.

My biggest concern is that BAT assessment (Appendix 3) references SG 6. This was withdrawn in December 2020. They need to demonstrate compliance with technical standards in BAT conclusions for surface treatment using organic solvents including preservation of wood and wood products with chemicals 2010/75/EU. See attached interpretation Guidance.

The Dispersion modelling/risk assessment needs to consider other than normal operating conditions (OTNOC). BAT 13.

I think their argument to continue to use NMP is weak, and it isn't entirely clear their reasons. They refer to UKBIC but it's not clear in what context and given UKBIC operations are considerable smaller operating under a part B permit I want to see more justification. You may wish to note that in UKBIC application submission their risk assessment and the limit of acceptability was taken as the Derived No Effect Limit (DNEL) for the general population in the Reach Dossier published by the European Chemicals Agency. The key finding was that using the predicted rate of solvent emission from the cathode coating process after abatement, assuming the worst possible case with effective chimney height of 0 and worst possible atmospheric conditions for dispersion, the predicted ground level concentration beyond the boundary was four orders of magnitude below the DNEL.

You should be aware that the chosen abatement system is untested at this scale in the UK. May be worthwhile getting then to report both mass and concentration. This would give more headroom needed in the permit for the operator to optimise performance. You may want to think about additionally monitoring/continuous voc.

Solvent Mass Balance – they need to agree the methodology with you. Referring to part B guidance PG6/44 is not appropriate. See Annex II of the IG attached.

I note that they will have medium combustion plant on site and will require a permit from the EA. This will be a top tier , COMAH site and though the decisions are interdependent. How they store some of the chemicals and deal with chemical management and fire may overlap so I strongly recommend you liaise with the HSE.

Perhaps you could share any further assessment with me prior to making your final decision. Happy to help review the permit,

Regards

LAU

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My Working Days are Monday to Thursday