

Mr. Wayne Davies
RPS Consulting UK & Ireland
2 Callaghan Square
Cardiff
South Wales
CF10 5AZ

**Our ref: PAN-022443
(EPR/XP3538LD/V007)
Your ref: EPR/XP3538LD**

Date: 24/08/2023

Sent via e-mail to: daviesw@rpsgroup.com
Cc: EOLoughlin@SouthHookLNG.com

Dear Mr. Davies,

We need more information about your application

Application reference: PAN-022443 (EPR/XP3538LD/V007)
Operator: South Hook LNG Terminal Company Ltd
Facility: South Hook LNG Terminal, Dale Rd, Herbrandston, Milford Haven, SA73 3SU

Thank you for your application received on 22/06/2023. Unfortunately, we need to ask you for some more details before we can consider duly making your application. The additional information required is summarised below.

Incorrect Application Type

- We do not agree that the changes you have proposed at the above installation site are minor technical in nature. Our guidance states that if your proposed changes will alter the nature of your facility's operation or increase the environmental risk posed, you will need to apply for a normal or substantial variation. Given that the changes proposed have the potential to increase the environmental risk posed at the site, the risks need to be fully assessed and thus fall within the category of normal variation. You will need to re-submit application forms C2, C3 and F1 to reflect that the application is for a normal variation. All additional supporting information will need to be submitted and referenced within the updated forms.

Incorrect Fee

- Unfortunately, as the application is deemed a normal variation, the fee you submitted (£1,311.00) is incorrect. The application fee should be calculated using your Opra score. Using the Opra score of 122 and relevant charge multiplier for normal variations (58), we have calculated your application fee as £7,076.00. This means

Ffôn/Tel 0300 065 4419

Ebost/Email Lucinda.hall@cyfoethnaturiolcymru.gov.uk
Lucinda.hall@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP

Wales Permitting Service (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

that an additional fee is due. Please pay the outstanding balance of £5,765.00 and provide confirmation of when payment was made along with payment details.

Risk Assessments

- We need to ensure the changes you are proposing are appropriate in terms of environmental impact. You have not submitted an Environmental Risk Assessment (ERA) as part of the supporting information. As a result, your application does not adequately assess potential impacts of emissions from the changes proposed to the site. The ERA should consider all hazards and risks from the site **as a whole** (i.e., the combined risk of existing and new processes to be permitted).
 - Please provide further assessment for noise following our H1 guidance, and where risks cannot be screened out, provide quantitative noise impact assessment and if appropriate a noise management plan in line with our guidance: [Noise and vibration management: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-and-vibration-management-environmental-permits). Information provided to date does not provide sufficient information on noise tonality or other acoustic penalties when considering the site as a whole, or provide details of the shelter construction specifications, which have the potential to amplify noise emissions emitted from the new compressor.
 - Provide a risk assessment of all other potential hazards, including discharges to surface waters, liquid storage proposed in the new shelter area. For any hazardous materials stored in this area, containment measures should meet the requirements of CIRIA C736. Information submitted indicates that there will be both effluent and clean surface water discharges from the new shelter area, however no information has been provided describing raw materials to be used (oils, lubricants etc.), or how these will be stored, or why an oil interceptor is required.

Operating Techniques, Plans and BAT Assessment

- You have not provided a detailed description of how the changes proposed to site will alter your sites operating techniques, nor have you submitted a BAT Assessment in support of your application demonstrating how your proposed changes meet relevant technical standards, including the revised BAT Reference Document (BRef) for Combustion.
- Please provide a BAT assessment that provides detail on how you meet all BAT applicable to the changes proposed on site. This should include, but not be limited to:
 - Changes to Energy Consumption and Energy Efficiency (in line with our guidance [Energy efficiency standards for industrial plants to get environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/energy-efficiency-standards-for-industrial-plants-to-get-environmental-permits) and relevant BAT Conclusions for the combustion sector.
 - Changes to plant configuration and resilience, and accident / abnormal or emergency management. Submit an updated Accident Management Plan if required.
- Within your application you have stated that where there is the potential for a significant environmental impact, systems (including where appropriate operational and/or maintenance procedures) have been put in place to ensure that the environmental effect is appropriately managed, avoided or where this is not possible, that it is minimised. Please submit details of all systems, operational and/or maintenance procedures that will change/have been updated as a result of the proposed changes.

Site Plans & Drawings

- **Drainage Plan** It is clear from the information submitted that the sites drainage will alter as a result of the changes proposed. It is not clear however if the changes will result in a new point source emission to surface water, or if the newly proposed drains and interceptor will connect with existing site drainage prior to leaving site. Please provide details of the changes proposed to site drainage for the new shelter and the site as a whole, and submit an updated site drainage plan.
- **Updated Site Plans and Technical Drawings** Please provide an updated site layout plan clearly showing the location of the new shelter in the context of the existing site

infrastructure, and the interconnectivity between the two. If the changes proposed introduce any new point source emissions, the location of these should also be clearly identified on the plan.

- **Process Flow Diagram** Please provide a process flow diagram which illustrates how the proposed changes interface with existing plant configuration.

If you need advice about how to complete the additional information requested, please contact your local area office. Call 0300 065 3000 and ask to speak to your local area office or your site officer.

Please reply within 10 working days from the date of this letter. If we don't hear from you we must return your application and fee.

If you email or write to us please quote the application reference **PAN-022443 (EPR/XP3538LD/V007)** on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions please phone me on 0300 065 4419 or email Lucinda.hall@naturalresourceswales.gov.uk, or alternatively email the installations permitting team at installationspermitting@cyfoethnaturiolcymru.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

Permitting Service