

Question 6

[With reference to question 2] Propose an approach and timetable for proposing/providing an Environmental Assessment Level (EAL) for the chemical substances that may be emitted to air as a result of the proposed carbon capture process, with due regard for permitting requirements and timelines.

Your application makes it clear that the carbon capture process may lead to trace emissions of chemical substances (amines, nitrosamines, nitramines). You have assessed impact of these emissions (Table 6.22, 6.23) using the Environmental Assessment Level for monoethanolamine. The published guidance which contains these EALs makes it clear that they are chemical substance-specific. There is no UK-regulator published EAL for the amines which you propose to use.

The guidance also makes clear that when a (new) chemical is proposed for use and/or emission, that has no EAL, the operator should propose an appropriate EAL, and gives guidance for how these may be determined. For your permit application to progress you need to outline an approach to proposing an EAL, based on the physical, chemical, toxicological (etc) properties of the substances that is in line with this guidance.

We understand that you and your proposed technology provider may still be working on a response to this matter. We cannot determine your application without this information and need to understand when this information will be available, for a duly making decision.

We have proposed our methodology for the calculation of EALs in MHI document “Derivation of Environmental Assessment Levels for Carbon Capture”. This document explains how MHI has calculated EALs according to EAE guidance and the current position of CCSA (Carbon Capture and Storage Association). This document gives EALs for the substances that may be emitted.