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Our Ref: ECL.012.01.01
Your Ref: PAN-001153

5th April 2017

Wales Permitting Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

For the attention of: Mr Saul White

Dear Saul,

RE: APPLICATION NUMBER: PAN - 001153
ENERSYS LIMITED
ENVIRONMENTAL PERMIT VARIATION APPLICATION
SCHEDULE 5 REQUEST FOR FURTHER INFORMATION

With reference to the above application, on behalf of EnerSys please find enclosed information submitted in relation to the Schedule 5 Notice issued by the Natural Resources Wales ("NRW") dated 3rd April 2017. For clarity NRW's questions appear in italics and responses have been made in the order in which they were raised within the Schedule.

Yours sincerely,

Sarah Burley
for Environmental Compliance Limited.

environmental compliance

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RESPONSE TO SCHEDULE 5 NOTICE DATED 3rd APRIL 2017

NRW QUESTION

In your air modelling and assessment report you have considered the Process Contributions (PC's) of the emission of pollutants to atmosphere to assess the impact of air based emissions. Can you please consider the background levels and calculate the Predicted Environmental Concentration (PEC) for each of the emission Points (A4, A6, A8, A11, A69, A70). If any of these PEC values are above 70% then detailed dispersion modelling will need to be carried out.

ECL RESPONSE

Background lead levels have been obtained from the site boundary lead monitor. The downstream, ambient monitor, positioned on the eastern boundary of the site had a rolling average reading of 0.10µg/m^3 (please see the Fugitive Emissions Report 2016 attached). However, it is important to note that this value would already take account of the existing emissions from all stacks on site, therefore adding the Proposed Scenario (See Table 7 of P2414/R001) PCs to the background would effectively be double accounting and consequently not representative of the actual PEC.

As there will be a reduction in PC under the Proposed Scenario, it is suggested that the existing background level obtained at the site boundary will also see a reduction.

The difference in PC between the Existing Scenario and the Proposed Scenario is -0.032µg/m^3. Consequently we would like to suggest that in this case the PEC should be calculated as the existing background added to the difference in PC. Consequently:

$$PEC = Change\ in\ PC + Existing\ Background$$

$$\therefore PEC = -0.032 + 0.1$$

$$\therefore PEC = 0.068\mu g/m^3$$

The air quality standard ("AQS") for lead to be used in the assessment is 0.25µg/m^3. The PEC as a percentage of the AQS is therefore 27.2%, and consequently can be considered insignificant.