From:
Sent: 28 August 2018 15:13
To:
Cc: Richard Tiffin
Subject: RE: Request for clarification

Jeremy,

HSE records indicate that the Johnson Matthey site at Royston benefits from deemed hazardous substances consent from 1992 (ref 91/11/1185/HSC) for 24 tonnes of chlorine and that an express consent application (18/00906/HSD) is currently being considered for substances including those dangerous for the environment.

The current planning consultation zones for the site at Royston are based on the 1992 deemed hazardous substances consent for the site (ref 92/11/1185/HSC). Those zones are centred on an area in the centre of the site, not the area currently identified for chlorine drum storage. I do not have the details of that application to hand, other than the quantity of substances included in it. However, I would suggest that the positioning of the zones is because either the deemed consent claim did not specify the chlorine location or the location has moved since 1992.

For the application that is currently under consideration (18/00906/HSD), HSE's response was based on the understanding that hazardous substances consent was not required for chlorine because the quantity proposed to be present on site (3.5 tonnes) is below the controlled quantity, even when the "addition rule" in Note 5 to Schedule 1 of the Regulations is applied (see paragraph 4 of the attached letter). If the chlorine capacity is increased by 1 tonne to 4.5 tonnes, and no change is made to the quantity of petroleum products or silver nitrate, then hazardous substances consent would be required for the chlorine by virtue of the addition rule. The table below shows the application of the addition rule for the quantities proposed.

Name, or relevant category or description of substance	Part number in Schedule 1 to the Regulations	Maximum quantity proposed to be present in tonnes (q)	Controlled Quantity (Q)
Petroleum products	Part 2: 34	200	2500
Chlorine	Part 2: 10	4.5	10
Silver nitrate	Part 1: P8, E1	25	50
	Sum Σ	**1.03**	

HSE's advice to the current application (18/00906/HSD) would be influenced by the proposed increase in chlorine capacity – chlorine was not considered in the previous response because hazardous substances consent was not required for chlorine. If hazardous substances consent is required for chlorine, then the location of the Chlorine House may affect HSE's advice and would impact the planning consultation zones associated with the hazardous substances consent. Without doing the assessment for chlorine in the proposed location it is not possible to say how the advice would be affected. Additional information such as throughput of drums and control measures in place would be required to give a detailed response. HSE now provides a commercial pre-application service to support the development of Hazardous Substances Consent applications. For example, HSE can assess the options available in relation to the quantities of hazardous substances held, and where these are stored, before the application is finalised.

Please see the website for further information and do not hesitate to contact me if you would like to discuss: http://www.hse.gov.uk/landuseplanning/hazardoussubstances.htm

Kind regards,
Karen



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From: Jeremy Steeley [mailto
Sent: 28 August 2018 09:35
To: Karen Garesse
Cc: Richard Tiffin
Subject: Request for clarification

Hi Karen

I have a minor question reference the Hazardous consent application and was hoping you could assist.

The Board have authorised a major rebuild of the refinery at Royston and as part of this I wish to rebuild the Chlorine House and possibly increase the capacity by 1 ton, We would like to move the location by approx. 45m south 25m West.

As the hazardous consent is not complete I have asked Richard to place on hold while we review.

The question is would this affect the planning consultation zones? And if possible are the current zones centered on the chlorine house or center of the site ?

Many thanks

Jeremy Steeley
Site Manager



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