

Mr Jonathan Wilson
BOWL Consenting Manager
SSE Renewables Limited
1 Waterloo Street
Glasgow
G2 6AY

Our Ref: 003/OW/BOWL - 8

28th July 2017

Dear Mr Wilson,

ELECTRICITY ACT 1989

MARINE (SCOTLAND) ACT 2010 & MARINE AND COASTAL ACCESS ACT 2009, PART 4 MARINE LICENSING

Thank you for your correspondence dated 25th and 27th July 2017 providing the details of three chemicals proposed to be used by Seaway Heavy Lifting (“SHL”) for piling and jacket installation activities during the offshore wind farm construction operations.

You have confirmed that Baker Hughes Sodium Silicate Solution, Clariant Oil Services UK FLOCTREAT 7844 (“FLOCTREAT 7844”) and Roemex Inhibitor (“RX-5227”) will be used during the operations.

The Baker Hughes Sodium Silicate Solution, you have stated, will be used for hose cleaning. You have stated that; *‘The grout hoses are emptied in to skips on the SHL vessel and (sea)water is used to clean the hoses into the same skips. The flocculant (Baker Hughes Sodium Silicate Solution) is then used to improve the settling time of the grout waste / wash-out water. The clear wash-out water is collected. This wash-out water is then used to flush the grout lines (to sea) prior to grouting operations at the next location. The solid grout waste residue is disposed of as waste (i.e. not discharged overboard).’*

You have proposed that 300 litres of raw product will be used with a dilution factor of 0.025% which will result in approximately 0.075 of the total raw product equivalent in the grout mix will be being released overboard.

Baker Hughes Sodium Silicate Solution is present on the Offshore Chemical Notification Scheme (“OCNS”) list, which uses the OSPAR Harmonised Mandatory Control Scheme (HMCS) developed through the OSPAR Decision 2000/2 on a Harmonised Mandatory Control System for the Use and Discharge of Offshore Chemicals (as amended by OSPAR Decision 2005/1) and its supporting Recommendations. Baker Hughes Sodium Silicate Solution, is detailed as being a product Posing Little Or No Risk (“PLONAR”) and OCNS grouping ‘E’ which is a product considered to have the least potential environmental hazard risk. MS-LOT, on behalf of the Scottish Ministers, is therefore content with the use of Baker Hughes Sodium Silicate Solution during these works.

With regard to the FLOCTREAT 7844; this product will be used as an alternative to the Baker Hughes Sodium Silicate Solution and not in addition to it. You have stated that; *'The grout hoses are emptied in to skips on the SHL vessel and (sea)water is used to clean the hoses into the same skips. The flocculant (FLOCTREAT 7844) is then used to improve the settling time of the grout waste / wash-out water. The clear wash-out water is collected. This wash-out water is then used to flush the grout lines (to sea) prior to grouting operations at the next location. The solid grout waste residue is disposed of as waste (i.e. not discharged overboard).'*

You have proposed that 300 litres of raw product will be used with a dilution factor of 0.025% which will result in approximately 0.075 of the total raw product equivalent in the grout mix will be being released overboard.

FLOCTREAT 7844 is present on the OCNS list, detailed as being a product Posing Little Or No Risk ("PLONAR") and OCNS grouping 'E' which is a product considered to have the least potential environmental hazard risk. MS-LOT, on behalf of the Scottish Ministers, is therefore content with the use of FLOCTREAT 7844 during these works.

You have also confirmed the used of RX-5227 anti corrosion chemical. A total of 30 litres will be used, to protect the pipes from biofilm build up and corrosion. The RX-5227 will be be diluted with water to 0.0033%, with the amount of total raw product being discharged to sea being 0.001 litres.

In our letter of 18th July 2017 we confirmed that as RX-5227 is present on the OCNS list, MS-LOT, on behalf of the Scottish Ministers, is content with the use of RX-5227 during these works.

MS-LOT, on behalf of the Scottish Ministers, therefore approve these three chemicals (Baker Hughes Sodium Silicate Solution, Clariant Oil Services UK, FLOCTREAT 7844, and Roemex Inhibitor), proposed to be used by SHL during the piling and jacket installation activities of the wind farm construction operations, submitted on the 25th July 2017, and can confirm that these chemicals are in compliance with condition 3.1.7 of the Offshore Windfarm Licence (licence number: 04462/16/0).

Yours sincerely,

Nicola Bain
Marine Scotland Licensing Operations Team