

APPENDIX 12: E-MAIL EXCHANGE BETWEEN MR DIXON AND MR WHARTON

CORRESPONDENCE BETWEEN THE BANKS AND MR DICKINSON

Chronology

NB – Persons representing the banks are in blue font.

IW = Ian Wharton of RVA Group representing the Banks

PR = Peter Roberts of DWD representing the Banks

Date	From	To	Content
17 Jan 2019	SMH (SSI)	Mr Booth, Mr Gooding and Mr Teague of STSC	Email: "... At the meeting we had with Paul on 7th January, it was agreed that STDC would make available a number of documents for the banks, SSI and the various valuers. This was going to be arranged by Addleshaw Goddard through a so-called internet "portal" that everyone would be able to access. Unfortunately, nothing seems to have happened so far. Consequently, it would be helpful if you could make available physical copies of all the building drawings, layouts and plans that you have, at your office next week. I am not asking for additional copies to be made, simply that they are available to the valuers (mainly DWD and RVA), to avoid the necessity of taking detailed measurements, etc. Thanks in advance."
17 Jan 2019	PER (DWD)	Mr Dickinson (SSI)	Email: "We haven't seen any plans, drawings or site reports yet and need these to make the visit as useful as possible as otherwise we can't cross reference these with what we see on site." However, Mr Dickinson replied, copying in Mr Booth (STDC), Mr Allison (STDC), Mr Teague (STSC) and Mr Gooding (STSC) commenting "...I'm not sure what you mean when you refer to site reports. Drawings won't be sent in advance" to which I responded "I'm referring to site condition/contamination bore hole reports, waste tip site surveys, carpet surveys/reports, asbestos reports, building condition reports etc - basically everything that tells us what is actually present on the site. Again, this is to avoid duplication of effort."
18 January 2019	Mr Dickinson (STSC)	PER (DWD)	Email: "...Conscious of your emails yesterday, Re advance availability of reports etc. We have had much conversation in-house and with the with the Official Receiver in relation to your request. STSC still has a legal obligation to the O.R. via a management agreement and as such the receiver is reluctant to pass over electronic or hard copies of information. However, I have sought agreement with him that drawings may be viewed on screen during the visit. Copies of any specific drawings may then be requested and referred to the O.R. which will either be carried out during or after the visit, as is required. STDC personnel are currently pulling together reports which have been commissioned by them in relation to ground survey work undertaken since very early 2017. I believe this will be uploaded to a web box and I will pass on the details as I receive them..."
21 January 2019	IW (RVA)	Mr Dickinson (STSC)	Email: "Hello Karl/Paul; Good to meet you yesterday, thank you for your/your teams help."

			<p>As discussed see below for initial thoughts re RVA/DWD drawing/documentation requests; have sent it as a joint email since not sure which items will fall 'pre,' or 'post' Administration, and hence if STSC can supply now, or if needs input from OR. Anticipated this list will be updated as we understand the site in more detail.</p> <p>Ideally these should be provided in an electronic format, and uploaded to a VDR/Portal.</p> <p>As soon as possible please recognising the timeline we are working to, scheduled late February meeting.</p> <p>Hope this all makes sense; am with you again this morning, can check you have received this email ok, and any initial queries you may have.</p> <p>Thanks; Ian.</p> <p>1; Full site plan, ideally in AutoCAD format which allows us to drill down to individual structures/MPI's.</p> <p>2; Individual site plans of respective plant areas/structures; including where applicable discrete floor plans.</p> <p>3; Structural/General Arrangement/Elevation drawings of individual buildings/structures. (Karl, the folders you showed yesterday would be good start)</p> <p>4; Karl?; Any Hazardous Construction/Insulation Materials Surveys completed post Administration; Asbestos 'Management' or Refurbishment/Demolition Surveys.</p> <p>5; Any Hazardous Construction/Insulation Materials Surveys existing pre Administration; Asbestos 'Management' (Type 2) or Refurbishment/Demolition (Type 3) Surveys.</p> <p>6; Karl?; Site Investigation/Ground contamination Surveys completed post Administration.</p> <p>7; Any Site Investigation Survey/Monitoring Surveys existing pre Administration.</p> <p>8; General Arrangement drawings of PCI Plant structure; Hoppers, Coal Mill; including individual GA's of Coal Mill.</p> <p>9; General Arrangement drawings of Blast Furnace.</p> <p>10; Simple Process Description/PFD's of individual plant areas; example; Coke Ovens By Products Plant.</p> <p>11; Asset Register; Equipment List by individual Plant Area.</p> <p>12; Karl?; any other surveys completed post Administration which identifies potential liabilities/values of site/individual areas."</p>
22 January 2019	Mr Dickinson	IW (RVA)	<p>Email:</p> <p>"Morning Ian and all. There is a mix of pre / post liquidation & then into the Development Corporation, in your list below. I shall forward this on to the Official Receiver now, and also to DC to see what else they may have. The info I will be able to give you and also have access to now is in the pasted list below. I have spoken with our IT after the visit yesterday and we are going to create a One Drive Account for this information, although I will mention the VDR Portal you refer to below. Note: The GI Contracts refers to different land areas."</p>
23 January 2019	IW (RVA)	Mr Dickinson	<p>"Hello Karl/Paul;</p> <p>Thanks for help yesterday, much appreciated. As discussed couple of additional documentation requests;</p> <p>1; Would like to have a specific site plan which shows the railway lines and ownership of such; which sections are SSI please.</p> <p>2; General Arrangement drawings of BOS Plant Furnace.</p>

			Any queries please get in touch."
23 January 2019	Mr Dickinson	IW (RVA)	Thanks Ian and noted.
26 January 2019	IW (RVA)	Mr Dickinson	<p>Hello Paul/Karl; Thanks for help this week, much appreciated. Can you please say Monday? I let us have some feedback as to which documents will be available, and when. SSI are asking RVA/DWD to hit certain deadlines during February for which this documentation would be useful/essential in some cases. Hope this makes sense; any queries please get in touch. Thanks; Ian.</p>
26 January 2019	Mr Dickinson	IW (RVA)	Understand Ian. I have sought permission from the O.R. but will follow up on Monday" and Mr Smith also responded saying "Evening Ian Will endeavour to complete your request for Monday
[]	Mr Dickinson	IW (RVA)	<p>Mr Dickinson emailing DWD and RVA copying in "procurement STSC", Mrs Houston (STDC), Mr Allison (STDC), Mr McNicholas (STDC), Mr Teague (STSC), Mrs Unsworth (STDC) and two representatives of the Banks stating " Later this morning, barring any technical difficulties, you should each receive an email for access to the STDC One Drive system. At present the GI reports reside in this location. I will be adding further information during the course of the day and will advise to this group once added. Please note, as already provided prior to the visit, the following statement applies to all information already passed over, whether verbally or in writing and also that which will be posted in the One Drive platform. I must advise that access to drawings is proving difficult as they are complete with a copywrite from the original designer and at present this puts the Official Receiver in a difficult position"</p>
7 February 2019	IW (RVA)	Mr Dickinson	<p>Hello Karl; Thanks for help with this, much appreciated. We have received the initial batch of documentation earlier this week which generally just comprised Site Investigation reports. As of this morning don't think any other documents have been added? Can please let us know what plans are for this; just conscious we are working to tight timeline re your meeting on the 28th and this documentation is essential for the preparation work required. Hope this makes sense; any queries please get in touch. Thanks; Ian.</p>
7 February 2019	Mr Dickinson	IW (RVA)	<p>Morning Ian and thanks for your note. Apologies for the delay. We are currently in discussions with the Official Receiver and what he feels he can legally disclose without compromising copywrite laws. Drawings are the main issue, so much so that we have a high level telecon discussion planned with him for tomorrow morning at 08:00, including Paul Booth, STDC CEO. Today I will be uploading asbestos reports which form part of our asbestos register and records, we have had to redact certain</p>

			<p>dates, once again, on the advice of the O.R. but these are now ready.</p> <p>What would be useful would be to understand your MUST HAVE information. I do have a rails system drawing and BOS vessel drawing, which you specifically asked for, once again, subject to the copywrite discussion. I have previous lists of what you have asked for but a more focussed list would be useful.</p> <p>Please advise</p>
8 February 2019	Mr Dickinson	IW (RVA)	<p>Mr Dickinson emailed DWD, RVA, members of the Banks and STDC on 8 February 2019 advising as follows:</p> <p>"As emailed earlier this week we have held a telecon with the Official Receiver at 08:00 this morning. The outcome is that an official response will be sent to SSI in relation to the information requested which does not currently reside on the One Drive access, this mainly surrounds drawings.</p> <p>In relation to the SSI & CERI request concerning items which may longer exist on site, then this is a matter that should be taken up by SSI with the Official Receiver or his representative. I am unable to help any further with this matter.</p> <p>For those who have looked at the one Drive System this morning you will see that I have uploaded a significant amount of asbestos register details this morning along with formal survey reports, with certain information redacted but not the technical detail. There are more reports to follow. Plant process details were uploaded earlier in the week.</p> <p>I am happy to answer any questions but please bear with me in terms of the information I am unable to upload at this time."</p>
13 February 2019	IW (RVA)	Mr Dickinson	<p>Hello Karl;</p> <p>Thanks for sorting the IT problems this morning.</p> <p>Another documentation request;</p> <p>1; CH2M Report; 'Site Remediation Cost Estimate.'</p> <p>Also; see attached spreadsheet which lists all our documentation requests. Would it be possible please to update it with your current thinking of what else we can expect to receive, and when; and indeed any that you are aware are not intending to release/outside of our jurisdiction.</p> <p>Just trying to understand what is anticipated so can plan our work; various milestones looming!</p> <p>Any queries please get in touch</p>
18 February 2019	Mr Dickinson	IW (RVA)	<p>I have consulted with my DC colleagues in relation to the specific report you reference, i.e. 1; CH2M Report; 'Site Remediation Cost Estimate. Unfortunately the costings within are considered to be commercially confidential and therefore not available for release.</p> <p>Within the retained ex SSI workforce on site we do not have the capacity to provide all of the plant process descriptions requested in the spreadsheet. The vast majority of the remainder of your requests involve drawings which are unavailable at this time from the Official Receiver.</p>
12 February 2019	Mr Dickinson	IW (RVA)	<p>Following discussions at this end I can now advise that we are able to release the work associated with the CH2M Site Remediation Cost estimates. There are 3 files within the sub folder below which is titled, "Site Remediation Cost Estimates", within the One Drive folder.</p>

			<p>I should point out that this information had already been issued to Duff & Phelps / Mishcon de Reya in October 2018 when the valuation was going to be a desktop exercise before the recent site visit was discussed."</p> <p>PR comment – this information had not in fact been previously provided as claimed by Mr Dickinson.</p>
27 February 2019	Mr Dickinson	IW (RVA)	<p>I am unable to release any of the drawings I may have shown the visitors on the screen during the visit. I know this has already been indicated to you, PCI was one such drawing I put up for viewing.</p> <p>PR comment – Mr Dickinson had not made any drawings whatsoever available for viewing by DWD, Duff & Phelps nor DWD.</p>