

Wharmsby, Hayley

From: Nash, Andrew <andrew.nash@veolia.com>
Sent: 12 December 2018 10:42
To: PSC Land
Cc: Chintan Desai; Jamie Borgeat
Subject: Re: We need more information about your application EPR/BW3281IA/V005
Attachments: Q3 Air Mornitoring report 2017.pdf; Q2 air monitoring reportb 2018 .pdf

Categories: Hayley

Hi

Answers to your questions are set out in red type below. we trust this is sufficient to allow the application to be Duly Made.

Abatement and Abatement System:

Indicative BAT 48 in your BAT assessment confirms that “no uncontrolled venting to atmosphere should be allowed and all vents should be linked to suitable scrubbing and abatement systems”. Please confirm that this **will be** the case.

Yes this is confirmed - all tanks are linked to the scrubber system

Please confirm that the R3 scrubber connection also includes capturing and abating ‘tank breathing’ as the treatment tank gets filled.

Yes, a pump interlock is installed to prevent the tank filling unless scrubber is operational

Please confirm that this treatment tank has a pressure release valve and not an open vent to atmosphere.

The tank is not pressurized, however there is a lid that covers the tank with a small opening for tank sampling and the scrubber connection pipework. See comments above which confirm a system is in place to prevent emissions to air.

Have you assessed the adequacy of the scrubber abatement system to take and cope with a revised set-up? This is not just about emission loadings from the tanks but also to do with infrastructure alterations that may have a negative effect on scrubber operation and performance.

Scrubber has historically run at only 50% of its capabilities. It was designed to manage the emissions from 3 tanks as there was previously a third tank installed at the site, so we believe it is more adequate to cope with the new set up. In future we will continue to monitor the effectiveness of the scrubber system.

We will need to review the actual H1 database. I can send you a cloud link into which you can download the file as it'll be too large to send by email. We will also require a copy of the raw data you have used to input into your H1 assessment.

I've already uploaded the file and a copy of the latest 6 monthly air emissions monitoring results from 2017 and 2018 are attached.

Is the southern bund wall by the large tank in 'Bund F' 1.5m or 0.95m high? This wall is shown on your plan as 0.95m high by 'Effluent Tank E2'?

The drawing is a bit confusing. The entire perimeter bund around R3 is 1.75m but there is an internal separating wall between Bund F and Bund E which is 1.5m. The capacity of the bund to the internal 1.5m overflow is appropriately sized for the tanks with the additional benefit of adjacent capacity of Bund E.

Confirm that the site bunds, including the one containing R3, as well as any tertiary containment are regularly inspected and that collected rainfall is removed regularly (especially as part of the tertiary containment contingency is the 'Rain Pit').

All bunds are inspected by an external independent civil engineer on an annual basis and a visual inspection carried out on a weekly basis by the site maintenance team. We empty bunds when required with the use of pumps and site based tankers.

Is there still sufficient freeboard available to account for 'uncertainty' as per CIRIA 736 Sections 4.4 and 4.5?

The bund calculations are set out in Appendix C. The capacity of Bund F is appropriate for the tanks in that bund, however should there be additional inputs (rainfall, firewater) and dynamic effects such as wind then there is an overflow in the internal 1.5m wall - west of R3 which would then fill into adjacent Bund E - as described above. Should this additional bund fill, which is highly unlikely, then the tanks would benefit from the capacity of Bund E and F up to the 1.5m overflow. This is still 250mm below the top of the external bund which is 1.75m high.

Andrew Nash
Permitting Manager
Permitting and Environmental Control
United Kingdom

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Norwood Industrial Estate, Rotherham Road, Sheffield. S21 2JG

On Fri, 7 Dec 2018 at 15:12, PSC Land <PSC@environment-agency.gov.uk> wrote:

Dear Mr Andrew Nash,

We need more information about your application

Application reference: EPR/BW3281IA/V005

Operator: Veolia ES (UK) Limited

Facility: Redbournbury Treatment Plant

Thank you for your application received on 05/10/2018.

I need to ask you for some missing information before I can do any more work on your application. Please provide us with the following information –

Abatement and Abatement System:

Indicative BAT 48 in your BAT assessment confirms that “no uncontrolled venting to atmosphere should be allowed and all vents should be linked to suitable scrubbing and abatement systems”. Please confirm that this **will be** the case.

Please confirm that the R3 scrubber connection also includes capturing and abating ‘tank breathing’ as the treatment tank gets filled.

Please confirm that this treatment tank has a pressure release valve and not an open vent to atmosphere.

Have you assessed the adequacy of the scrubber abatement system to take and cope with a revised set-up? This is not just about emission loadings from the tanks but also to do with infrastructure alterations that may have a negative effect on scrubber operation and performance.

We will need to review the actual H1 database. I can send you a cloud link into which you can download the file as it'll be too large to send by email. We will also require a copy of the raw data you have used to input into your H1 assessment.

Is the southern bund wall by the large tank in 'Bund F' 1.5m or 0.95m high? This wall is shown on your plan as 0.95m high by 'Effluent Tank E2'?

Confirm that the site bunds, including the one containing R3, as well as any tertiary containment are regularly inspected and that collected rainfall is removed regularly (especially as part of the tertiary containment contingency is the 'Rain Pit').

Is there still sufficient freeboard available to account for 'uncertainty' as per CIRIA 736 Sections 4.4 and 4.5?

Please send the information, quoting the above application reference, to:

Email address: psc@environment-agency.gov.uk.

Postal address:

Permitting and Support Centre

Quadrant 2

99 Parkway Avenue

Sheffield

S9 4WF

Please send the information by 21/12/2018. If we don't hear from you, we must return your application.

When we receive the requested information, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

If you have any questions please phone Liz Ebbs on 020302 52781 or email liz.ebbs@environment-agency.gov.uk.

Yours sincerely

Harace Hussain

Permitting Support Advisor

Part of National Operations

National Permitting Service (part of National Services E&B)

☎ External: 02030256381 ☎ Internal: 56381 ☎ (Team Number) 02030253898

✉ Land Team, Environment Agency, Quadrant 2, 99 Parkway, Avenue, Sheffield, S9 4WF

✉ Email: harace.hussain@environment-agency.gov.uk

✉ Email: PSC@environment-agency.gov.uk

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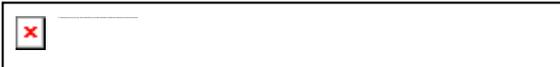


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