

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Company Secretary - Lyndi Margaret Hughes

Viridor South London Limited

Viridor House
Priory Bridge Road
Taunton
TA1 1AP

Application numbers: EPR/GP3305LN/V003 and EPR/JB3136RD/V004

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 19/10/2022 and 21/03/2023.

Send the information to either the email or postal address below by 26/05/2023. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

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

Postal address:

Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
██████████	05/05/2023

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

Waste Management

1. Demonstrate how each stage of the process is sufficiently sized/operated to manage the proposed increase in throughput. This needs to cover the following areas:
 - o Vehicle movements onsite.
 - o Tipping hall.
 - o Bunker management, including how you will ensure a homogeneous mix entering the combustion chamber is achieved.
 - o Waste management for wastes produced onsite from the incineration process.
 - o Emissions abatement equipment.

You have demonstrated how you will manage the increase in waste in the combustion chamber, however the impacts of increased throughput on other aspects of waste management have not been considered.

2. The Waste Acceptance Criteria should be provided as a standalone document and must include:
 - o Your contingency plans if waste amasses onsite. This needs to cover both the incinerator and waste transfer station activities.
 - o Your procedures for managing mirror coded wastes.

This is required as the waste acceptance criteria and waste pre-acceptance operational documents will be included in the operating techniques table in the permit.

You need to demonstrate that suitable plans are in place to manage the waste during periods of abnormal operation, such as unexpected plant shutdowns.

Mirror coded wastes must be managed in line with the WM3 guidance, however there is no mention of mirror coded wastes in the waste acceptance criteria supplied.

Operating Techniques

3. Confirmation if any of the operating techniques listed in table S1.2 have been updated. If they have been updated, then provide an updated copy.

The outdated operating techniques will be removed from the permit.

4. Operating techniques for the waste transfer station, including the operation of the shredder. The shredder operating technique must include:
 - o Details of the abatement techniques, such as dust spray bars.
 - o What waste codes will be processed through the shredder.
5. Confirmation if the Fire Prevention Plans for the incinerator and waste transfer station have been consolidated. If they have, then the consolidated plan must be provided, if not, then the Fire Prevention Plan for the waste transfer station must be provided so that it can be added to the operating techniques table.

Other Information

6. Confirmation of how overpressure in the turbine is managed and what the emissions are when it is bypassed.

This is required as a there was a public comment that needs addressing, which was that there are relatively frequent venting incidents where the chimneys need to be bypassed due to overpressure in the turbine. When this happens emissions are vented through the roof.

7. Demonstrate how you have assessed the risk of noise from the expected increase in vehicle movements onsite.
This is required as the risk from noise may increase due to the increase in vehicle movements onsite, however this risk has not been addressed in the risk assessment.
8. Confirmation what the expected process water consumption per annum will be.
9. An updated Site Condition Report to include the full site and its activities as the two permits are to be consolidated. This must follow the Environment Agency guidance: H5 Site Condition Report.
This is required as the two permits are being consolidated and new activities are being added into the permit.
10. Confirmation of what you would like the site name to be.
This is required as the two permits have different site names.

Greenhouse Gas Assessment

11. An updated greenhouse gas assessment must be provided, with changes to the below calculations.
 - Confirmation of the total number of operational hours for the years 2021 and 2022. If these are dissimilar to those in the GHG assessment, then the GHG assessment will need to be updated, including the existing case.
 - The total amount of power generated must take into account the number of operational hours of the turbine, not just the total number of operational hours.
 - The same parasitic load (3MW) should be used in the existing case.
This is being requested as it will give a more representative comparison between the current emissions and the proposed emissions.
 - The carbon content of the waste and biogenic carbon content should be based on monitored data. The same figures should be used for the existing case.