

Viridor South London Limited
Beddington ERF EP Variation
Not Duly Made response

1 Introduction

Following submission of the Environmental Permit (EP) variation application for the Beddington ERF (the Facility) (Ref: EPR/GP3305LN/V002), the Environment Agency (EA) has requested further information in relation to a number of points before the application can be Duly Made. This document and supporting appendices provide a response to the points raised by the EA.

2 Response to EA points

2.1 Air modelling files

Provide the air modelling data files. The air modelling files are required to validate the air modelling assessment that has been provided.

The air modelling data files were provided with the original submission. For the avoidance of doubt, and to avoid any further delays, these are provided again in Appendix A.

2.2 Air dispersion report

Within the air dispersion report, in section 3.4 reference is made to the 'permitted facility' and the 'proposed facility'. Where reference is made to the proposed facility does this relate to the proposed increase in processing capacity?

The 'Permitted Facility' refers to the Facility operating at the 100% MCR point (47.9 MWth) on the firing diagram. This is equivalent to an hourly throughput of 19.83 tonnes per hour per line. Assuming continuous operation, this equates to an annual capacity of 347,422 tpa, as currently allowed by the permit.

The 'Proposed Facility' refers to the Facility operating at the 110% MCR point (52.7 MWth) on the firing diagram. This is equivalent to an hourly throughput of 21.82 tonnes per hour per line. Assuming continuous operation, this equates to an annual capacity of 382,286 tpa, as being applied for within this application.

The AQ modelling has been undertaken using flue gas data representative of the 100% and 110% points on the firing diagram, extracted from the continuous emissions monitoring system (CEMS) for the Facility.

2.3 Habitats sites

Amend the environmental risk assessment to acknowledge the protected habitats. Currently neither the ERA or air dispersion report makes reference to the protected habitats which are within the screening distance. There are two SACs (Wimbledon Common and Richmond Park), six Local Nature Reserves and 16 Local wildlife sites within the relevant screening distances.

A copy of the EA's habitats screening tool is provided in Appendix B for reference. The screening tool confirms there are two SACs, six LNRs and 14 LWS (not 16 as stated above).

The Air Quality Assessment submitted with the EP application considered a number of habitats sites. However, there were some sites (LNR and LWS) which were not considered within the assessment. Therefore, the assessment has been updated to consider all of the habitats sites identified by the EA's habitats screening tool. The updated Air Quality Assessment is provided within Appendix C.

Furthermore, an updated Environmental Risk Assessment is provided within Appendix D, which includes for the protected habitats sites.

2.4 Emissions management

The fee (£1,241) for an Emission Management Plan has been paid however a Emission Management Plan hasn't been provided. Its assumed that the Emission Management Plan is for the Waste Transfer Station operation. Please provide a copy of the DEMP for review.

As described within section 3.2 of the Supporting Information submitted with the application, the current WTS permit already allows for the operation of a shredder at the WTS. However, it is noted that a specific emission point is not included within the current WTS permit for emissions to air from the shredder. Therefore, as part of this variation, it is simply proposed to incorporate this emission point within Table S3.1 of the consolidated permit.

As the current WTS permit already allows for the operation of a shredder, and the addition of the emission point is principally an administrative update to the consolidated permit, Viridor understands that an updated Dust Management Plan or other Emissions Management Plan is not required in support of the variation. The fee for an Emissions Management Plan was checked in error within Form F1 and should not have been paid. Accordingly, Viridor requests that a refund is provided for this part of the application fee (£1,241).

Notwithstanding the above, the Environmental Risk Assessment has been updated for completeness, to consider the risk of fugitive dust emissions from the operation of the shredder at the Waste Transfer Station (WTS) – refer to Appendix D.

2.5 Application fee

Overpayment of application fee. A fee has been paid to vary both incinerator lines, the additional 10% is only applicable to new permit applications (same activity carried out multiple times on the same site), it does not apply to variations. The proposed variation would fall under the single substantial variation application fee. As such £1,677.40 is to be refunded.

Viridor accepts the EA position on variation fees for multi-line incinerators, and requests that the refund of £1,677.40 is provided accordingly, in addition to the refund of £1,241 for the Emissions Management Plan (refer to section 2.4 for justification).

Appendices

- A Air modelling files
- B EA Habitats Screening Tool
- C Updated Air Quality Assessment
- D Updated Environmental Risk Assessment