

**From:** Anita Manns  
**To:** Raymond, Sarah  
**Cc:** Alvarez, Brenda (Guest); Waostaff, Matthew; Reynolds, Tom (Guest)  
**Subject:** RE: Request for further information and payment - Gravesend email 4 of 4  
**Date:** 08 January 2025 09:58:08  
**Attachments:** image008.png  
image009.png  
image010.gif  
image011.gif  
image012.gif  
image013.gif  
image014.gif  
image015.png

Hi Sarah,

Responses for the additional queries relating to Gravesend are below:

On review of the below we just need to confirm the payments and require the following information. Please provide this by the 9/1/2025.

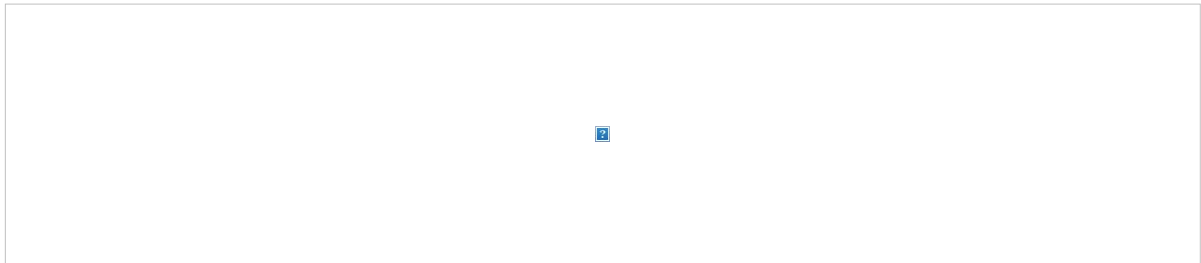
#### 1. Payment

Based on the response received this will be as follows which leaves a shortfall to pay of £1,207 to enable us to duly make the application. (£793 will be paid into acct# 10014411, sort code 607080. The payment will be in the Environment Agency's account by 17th December 2024. Payment ref is PSCAPPSOUTH001, £19,215 paid 12/11/2021)

- £13,984 Substantial variation application fee for - S5.4 (1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment
- Application fee for the for the temporary storage of digested cake and grit. – 1.16.12 -£3,965 at 50%
- Odour management plan – a fixed charge of £1,246
- Habitats assessment – a fixed charge of £779
- Emission Management Plan – a fixed charge of £1,241

Total = £21,215

The payment of £793 was paid on 10<sup>th</sup> December 2024 as below, so would have been showing in the EA's account on 19/12:



#### The additional payment of £1207 and is referenced as follows

Payment ref. PSCAPPSOUTH337 for £1,207 to EA account # 10014411, sort: 60.70.80 scheduled to be made on 09/01/25.

#### 2. Emission to air

You have advised that "The Air Quality Assessment which accompanied the environmental permit application for this site, dated 14/01/2019, included only the emissions from the CHP and did not include emissions from the boilers in the assessment. This assessment assumed that the CHP would be operating at 100% load for a full year because this is a more conservative approach than modelling a split in operational hours between the CHP and boilers. This conservative approach is still valid with the replacement of one of the digester boilers and no update to the Air Quality Assessment and H1 screening assessment is necessary." Your boilers operate on Gas oil or biogas you will need to ensure that any air emission risk assessment reflects the operations that you intend to carry out.

#### Update your air quality assessment to include the boilers and provide your air quality modelling files.

As per email chain below, Southern Water are happy with the proposed limit on operation of the boilers. In summary this will be that they will be able to run on biogas, but not in conjunction with the CHP, and that they will be permitted to run for less than 500hrs on gas oil.

#### 3. Boilers

Document 'Application Variation - V002-790101\_CombustionPlant\_Gravesend' advises that boiler 2 operates on natural gas and light oil and not biogas. Confirm if this is correct as you have advised in your NDM response that the boilers operate on biogas and gas oil and that the boilers and CHP can not operate independently.

#### Confirm the fuel type that boiler 2 operates and ensure that all documents are updated to reflect the correct fuel type.

Boiler 2 operates on biogas and gas oil, not natural gas as advised in the Application Variation - V002-790101\_CombustionPlant\_Gravesend.

If you require anything further please let me know

**Anita Manns**  
Pronouns: she, her, hers  
Senior Associate - Waste and Resource Management



Mott MacDonald Restricted

**From:** Raymond, Sarah  
**Sent:** Tuesday, January 7, 2025 9:23 AM  
**To:** Anita Manns  
**Subject:** RE: Request for further information and payment - Gravesend email 4 of 4

Hi Anita,

If you would like to proceed on this basis, we would limit the operation of the boilers to not operate in conjunction with the CHP, and for less than 500 hours on gas oil. Would this be acceptable?

Thanks

Sarah

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**From:** Anita Manns  
**Sent:** 06 January 2025 17:15

**To:** Raymond, Sarah [REDACTED]  
**Subject:** RE: Request for further information and payment - Gravesend email 4 of 4

Hi Sarah,

I have a quick clarification on point 2 of the below. I have been speaking with our AQ team who are querying why the boilers would need to be modelled when the site has been modelled, at a worst case, with the CHP running at 100%. If the CHP doesn't operate only then do the boilers kick in. The ELVs for the CHP are higher than the boilers therefore, providing a conservative output.

If you require us to model the boilers, we would have to redo the whole of the modelling as the previous models/report were done by Ricardo. We cannot amend thirdparty models. This would not be available until 24<sup>th</sup> January as time would be needed to set up and run the models and update the report.

Please can you confirm that the modelling is definitely required to be updated and you are happy to extend the deadline for this to 24<sup>th</sup> Jan?

Happy to discuss.

**Anita Manns**

Pronouns: she, her, hers  
Senior Associate - Waste and Resource Management  
[REDACTED]

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**From:** Raymond, Sarah [REDACTED]  
**Sent:** Friday, December 20, 2024 11:28 AM  
**To:** Anita Manns [REDACTED]  
**Cc:** Reynolds, Tom (Guest) [REDACTED]; Alvares, Brenda (Guest) [REDACTED]  
**Subject:** RE: Request for further information and payment - Gravesend email 4 of 4

Hello Anita,

On review of the below we just need to confirm the payments and require the following information. Please provide this by the 9/1/2025.

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**Update your air quality assessment to include the boilers and provide your air quality modelling files.**

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**Confirm the fuel type that boiler 2 operates and ensure that all documents are updated to reflect the correct fuel type.**

Kind regards

Sarah

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**From:** Anita Manns [REDACTED]  
**Sent:** 11 December 2024 15:57  
**To:** Raymond, Sarah [REDACTED]  
**Cc:** Reynolds, Tom (Guest) [REDACTED]; Alvares, Brenda (Guest) [REDACTED]  
**Subject:** RE: Request for further information and payment - Gravesend email 4 of 4

Hi Sarah,

Please find attached the response and updated docs for Gravesend. This is email 4 of 4

If you have any further queries, please do not hesitate to contact me

Kind regards

Anita

**Anita Manns**

Pronouns: she, her, hers  
Senior Associate - Waste and Resource Management  
[REDACTED]

Mott MacDonald Restricted

**From:** Raymond, Sarah [REDACTED]  
**Sent:** Monday, November 18, 2024 11:31 AM  
**To:** Anita Manns [REDACTED]  
**Subject:** Request for further information and payment - Gravesend

Hello Anita,

Please find attached a request for further information. Please can you confirm the activities required before your submission date to ensure that we can calculate the correct charge. Should you need to discuss any of the questions raised please do not hesitate to contact me

Kind regards

**Sarah Raymond**  
Senior Permitting Officer – Installations  
Environment Agency | Trentside Offices, Scarrington Road, West Bridgford, Nottingham, NG2 5FA

[REDACTED]

Working days: Monday to Friday



**Do you operate a medium combustion plant or specified generator?**

[Click here to find out if you need to meet the regulations](#)



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