

Swadlincote ERF – Draft Schedule 5 AQ questions

- 1. Provide predictions at the identified receptors using maximum concentration for Cr (VI). The 'Guidance on assessing group 3 metal stack emissions from incinerators' requires justification when using any data lower than the maximum emission concentrations listed, i.e. where using the maximum emission concentration cannot be screened out.**

Notes:

Cr(VI) was incorrectly screened out at step 2 of the metals assessment (table 38 of AQA). If you calculate the PC% using the values in this table, the PC is ~7.8% of the EAL. This is based on max on grid results rather than max at receptor. Our audit indicates that when using the maximum emission concentration, the max at receptor PCs are not insignificant, and PECs exceed (it is acknowledged that the Cr(VI) background used in the Air Quality Assessment already exceeds the EAL (0.00025 µg/m³)).

The AQA assumes that 8% of total Cr backgrounds are Cr(VI) based on an EPAQs report. The 8% refers to data from Canada. The same passage states that 'in the UK it is likely that less than 20% of emissions are of Cr(VI)'. Our audits are conducted using the assumption that 20% of total Cr backgrounds are Cr(VI).

- 2. Provide a metals assessment for methyl mercury and thallium at your identified waterbodies, Caldwell Pool and Foremark Reservoir, or provide justification as to why this is not included.**

Note: Our e checks indicate that the intake process contributions from locally caught fish from the above water bodies could be greater than 10% of the Health Critical Values for methylmercury and thallium, if they stock fish for human consumption.

- 3. Clarify the ownership of the Cadley Hill Local Wildlife Site, including both the area of the Cadley Hill LWS within the proposed site boundary and the wider Cadley Hill LWS.**