

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

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The Directors of

R&P Clean Power Limited  
Celixir House Stratford Business & Technology Park  
Innovation Way  
Banbury Road  
Stratford-Upon-Avon  
Warwickshire  
CV37 7GZ

Application number: EPR/LP3327SK/A001

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 19/06/2024.

Send the information to either the email or postal address below by **02/05/2025**. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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: [REDACTED]

Postal address:

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

Name	Date
[REDACTED]	14/04/2025

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

### Odour

1. In the event of unplanned plant downtime, confirm what measures are in place to:
  - a. avoid odour issues arising
  - b. ensure that waste is not delivered to site, and
  - c. ensure waste present on site is removed in case of extended plant downtime

*Note: In the Odour Management Plan it is stated that 'Robust contingency planning in place for unplanned shutdowns' but the detail of this planning has not been provided. In your response detail what appropriate measures are committed to thereby ensuring compliance with BAT 21 of the waste incineration BAT conclusions 2019 (link: [Implementing decision - 2019/2010 - EN - EUR-Lex](#)).*

2. Confirm whether a wet scrubbing or activated carbon odour filtration system is intended to be used. If wet scrubbing is to be used, provide details of how waste water arising from it will be handled / managed.

*Note: It is stated in the Odour Management Plan that wet scrubbing and/or activated carbon filters will be in place.*

3. Confirm the maximum period that waste will be stored in the reception hall during normal operation, and how it will the first in first out principle be ensured.

*Note: A broad timescale has been suggested in the Odour Management Plan in the context of how many days' waste will be stored but not committed to.*

4. Provide an updated 'Point Source Emissions to Air and Water' Plan which details where the odour emission point will be.

*Note: There is an odour emission point detailed in the 'Air Quality Assessment' but not on the 'Point Source Emissions to Air and Water' Plan.*

5. Update the Odour Management Plan to include the odour mitigation measures detailed in the AQ assessment produced by Air Quality Consultants and any additional information provided in response to points 1 to 3 above.

*Note: The AQ assessment contained some odour mitigation measures which were not contained in the submitted Odour Management Plan.*

### Wastes to be received

6. In 'Section III: Supporting Information', it is stated that 'There may be the option to accept sludge wastes and, if such opportunity materialises prior to construction of the Facility, a dedicated tank for the storage of sludges will be incorporated in the design (location to be confirmed)'.

Confirm whether these waste codes are wanted in the permit now or whether it is the intention to add through permit variation prior to construction.

If wanted now, justify that these wastes are suitable for the intended incineration process and provide full details of how you would handle them, including, for example the location of any storage tanks and how these wastes will be introduced to the furnace.

7. Provide clarification on the following statement in the 'Air Quality Assessment':

*'waste will be pre-processed off site and delivered to the site as residual derived fuel (RDF), either in covered Heavy Good Vehicles (HGVs) or in wrapped bales'.*

*Note: This comment does not align with the wastes proposed to be taken at the site i.e. the application is not just requesting RDF.*

8. Provide details of what specific wastes will be taken under 19 08 99 and 20 03 99 and justification as to why these specific wastes cannot be taken under a non '99' waste code.

*Note: '99' codes can only be included in the permit if they cannot be characterised under any other code and specific descriptors limiting the type of waste to be taken under the code are included in the permit.*

9. Provide a specific description of the wastes that will be received under EWC code 19 12 12

*Note: This is a very broad code and we need to understand that any wastes taken under this code would be appropriate to be received at the facility.*

10. Provide a specific description of the wastes that will be received under waste codes falling under sub chapter 02 02 of the EWC.

*Note: We need these details to confirm that the Animal By-Products Regulations will not apply to the facility.*

#### **Groundwater and surface water protection**

11. Provide details of the engineering of the fuel bunker, demonstrating that liquid retention, both in operational and fire scenarios will be ensured.
12. Provide further information on what appropriate measures will be in place to prevent surface and groundwater pollution in the event of a credible flooding incident.
13. Confirm that storage tanks containing liquids potentially hazardous to the environment and associated bunding / spill mitigation, will be constructed as per the guidance in CIRIA C736 'Containment systems for the prevention of pollution'.
14. Provide further detail of the on-site engineering and management practices and drainage system characteristics that will be in place to ensure that all surface water leaving the site will be clean and uncontaminated.

## Other

### **15. SNCR vs SCR cost benefit assessment**

Provide a BAT assessment considering SNCR vs SCR. For both SNCR and SCR the assessment shall include but not necessarily be limited to:

- The cost
- The impacts of NO<sub>2</sub>
- The amount of NO<sub>x</sub> abated
- Cost per unit of NO<sub>x</sub> abated
- Energy efficiency
- Emission of N<sub>2</sub>O

### **16. Emergency Diesel Generator**

For the Emergency Diesel Generator confirm that it will meet 2g TA Luft and United States Environment Protection Agency (EPA) Tier 2 (or equivalent) standards.

## **End of Schedule 5 Notice**

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For awareness (these points do not form part of the Schedule 5 Notice):

#### **1. NO<sub>x</sub> ELV.**

*The ELV in the permit for daily NO<sub>x</sub> would be 100mg/m<sup>3</sup>. All plants that apply for a new EfW permit after October 2021 are expected to meet a daily average NO<sub>x</sub> ELV of 100 mg/m<sup>3</sup> where practicable. We would normally expect this to be achievable using SNCR.*

#### **2. Groundwater baseline data**

*There would be a pre-op to require Groundwater baseline data to be collected prior to permitted operations commencing on site.*

#### **3. Flue Gas recirculation assessment**

*There would be a pre-op requiring the consideration of Flue Gas recirculation.*

#### **4. Fire Prevention Plan**

*It is recognised that some details required for the FPP are unlikely to be available until final design. Therefore, a pre-operational condition would be added to the permit to ensure that final designs meet all objectives of our FPP guidance, with attention given to*

- a. Fire water availability and calculations as to why this will be enough to meet the objectives of the FPP guidance*
- b. Confirmation, with calculations, that the waste bunker and engineered features of the facility will have sufficient capacity to contain all firewaters in the event of a fire, ensuring that in no circumstances firewater would be discharged to surface or groundwater.*
- c. Detailing what procedures will be in place to ensure the waste storage volumes are minimised e.g. such as diverting waste away from site.*
- d. Providing a storage time limit after which waste would be removed from bunker*

*It is recognised that information on points c. and d. would already have been provided at determination but it would need to be incorporated into the updated FPP*

#### **5. R1 assessment**

*The R1 application submitted with the application was not submitted in the correct format with the required information. If you would like to apply for R1 status this can be done once any permit has been issued.*