

From: [Graeme Kennett | Mabbett](#)
To: [McClean, John](#)
Cc: [Martin Owen](#)
Subject: RE: 2ZLF, EPR/AB3904UQ/V005 - H1 Risk Assessment
Date: 16 June 2023 14:03:07
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.jpg](#)
[1403517 - June 2023.pdf](#)
[discharge of trade effluent to the public foul water sewer.pdf](#)
[H1TOOL_2.78_amended_2ZLF.zip](#)

Hello John,

Please find the amended H1 attached, the attached analysis from Severn Trent has now been used to populate the 'spot' column as this is more representative of the discharge. In my copy of the previously sent H1 tool, the only values in the 'maximum' column were those listed in the TEC, I'm not sure why both columns have been populated.

The TEC is currently under review by STW, hence the use of a single, 'spot' sample from the discharge point. Previous samples taken by STW did not cover the proposed parameters addressed in the latest STW sample and the previous sample used in the H1 was from a point within the process, so would have been at a point before any treatment and would be an absolute worst case scenario and not representative of the discharge. As such, the only regular sampling that has been in place is that in line with the TEC.

I had intended to use the proposed limits to be put in place by STW for effluents heading towards their WWTW for the purposes of the 'duly making' process, but until we have a copy of the reviewed TEC we are not able to confirm the limits that STW will put in place. Unfortunately, STW have a 60-day consultation period to review the consent and are unable to indicate any proposed Pb and Zn limits.

I have also attached the current TEC.

Thank you,

Graeme

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Please consider the environment before printing this e-mail

From: McClean, John <John.McClean@environment-agency.gov.uk>
Sent: Friday, June 16, 2023 8:43 AM
To: Graeme Kennett | Mabbett <kennett@mabbett.eu>
Subject: RE: 2ZLF, EPR/AB3904UQ/V005 - H1 Risk Assessment

Good morning Mr. Kennett.

In relation to the H1 and the use of 'spot' sample results for both average and maximum concentrations, I believed that 2ZLF had regular results of effluent sampling supplied as part of the sampling and testing against their trade effluent consent.

I therefore believed that you would have had a enough monitoring data to allow you to input both a realistic average concentration and a realistic maximum concentration into the H1 risk assessment tool.

Can you please therefore justify the use of a 'spot' sample result for both the average and maximum concentrations?

Best wishes – John.

John McClean

Senior Permitting Officer
National Permitting Service  Part of National Services E&B

Environment Agency

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From: Graeme Kennett | Mabbett <kennett@mabbett.eu>
Sent: 15 June 2023 14:40
To: McClean, John <John.McClean@environment-agency.gov.uk>
Subject: RE: 2ZLF, EPR/AB3904UQ/V005 - H1 Risk Assessment

Hello John,

All should be in the 'spot' column. I'll get my old laptop back out and have another look.

Graeme

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Please consider the environment before printing this e-mail

From: McClean, John <John.McClean@environment-agency.gov.uk>

Sent: Wednesday, June 14, 2023 10:41 AM

To: Graeme Kennett | Mabbett <kennett@mabbett.eu>

Subject: 2ZLF, EPR/AB3904UQ/V005 - H1 Risk Assessment

Hello Mr. Kennett,

I am reviewing your response to the Not Duly Made letter in relation to permit variation application, EPR/ AB3904UQ/V005.

I note that you have used a 'spot' arsenic analysis to represent both the average concentration and the maximum concentration on the 'Water Emissions Inventory' Tab.

You have not adopted the same approach for mercury, nickel, lead, zinc, cadmium, copper or chromium (III) – in each of these you have input only an average concentration and left blank the annual concentration.

Can you please explain why you have taken this approach as it can impact on the screening of impacts later in the H1 tool?

Thank you – John.

John McClean

Senior Permitting Officer

National Permitting Service  Part of National Services E&B

Environment Agency

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