

PSC Land

From: Parker, Michael <Michael.Parker@edfenergy.com>
Sent: 01 October 2019 17:33
To: Blackeby, Eleanor
Cc: PSC Land; Smith, Heather
Subject: FW: EPR/CP3035MK/V008 Not Duly Made Letter - Additional Information
Attachments: NDM letter 250919.pdf; Form EPF Application for an environmental permit – Part F1 - Charges and declarations 26092019.pdf; Form EPA Application for an environmental permit – Part A - About you 09052019.pdf; Form EPC Application for an environmental permit – Part C2 General – varying a bespoke permit 27092019.pdf; Form EPC Application for an environmental permit – Part C3 varying a bespoke installation permit 27092019.pdf; We need more information about your application and/or Underpayment of application charge EPR/CP3035MK/V008; ATT00001.txt

Categories: Niz

Dear Eleanor,

Thank you for your letter and for the email from the Permitting Support Centre outlining the additional information required for our application to vary the environmental permit for West Burton CCGT Power Station to include West Burton C Power Station. Please find our responses as detailed below.

1. Habitats assessment Form Part F

Form 'EPF Application for an environmental permit – Part F1 - Charges and declarations' has been revised as attached. This has also been sent by post, to the Permitting and Support Centre Sheffield, together with a cheque for the additional payment of £779, being the charge for Habitats assessment, and including the reference number entry for the additional cheque.

2. Form Part A Q1

Question 1 indicating we are applying as a registered company was completed in the form submitted. Please see the attached additional copy of this form attached.

3. Form Part A & Q7ab&c

Question 7 was also completed in the form already submitted indicating that I am the contact for this application and for questions regarding operations and billing. Please see the attached additional copy of this form.

4. Form Part C2 Q5d

This question 'Are you applying for an activity that includes the storage of combustible wastes?' was not completed as this was thought not applicable to our application, but has now been answered as 'no' in the revised Form 'EPC Application for an environmental permit – Part C2 General – varying a bespoke permit' as attached. The question is about the 'activity' which in form Part C3 is described as 'Burning of any fuel in an appliance with a rated thermal input of $\geq 50\text{MW}$ '. As our combustion plant activity is for the generation of electricity and not for the treatment or disposal of waste we consider that the question of storing of combustible wastes is inappropriate to the application. As a gas fired plant the fuel is not combustible waste and there will be no solid or liquid residues produced from the generation process.

The application report describes the creation of small quantities of wastes as normally arising incidentally by the operation and maintenance of the new power plant WBC; but storage of this waste is not the principal permitted activity. The quantities of waste arising are minor and the maintenance wastes referred to will be

held only temporarily in drums or other suitable containers within impermeable surfaced areas. The general waste arising may include materials such as oils, oil contaminated rags and containers, paper, cardboard and plastics; and as such may be considered to be combustible materials. The total wastes arising from WBC are expected to be below 1.5 tonnes per year. As is currently undertaken at WBB these wastes will be appropriately segregated and held safely on site until being transferred to suitably permitted off-site (external) waste disposal sites. Any segregated waste will be held for no longer than 12 months. As there will be no long term storage of any waste arising and waste management is not the permitted activity the answer to Question 5 has been given as 'No'.

5. Form Part C3 Appendix 1 Q6

Please find attached a revised Form EPC Application for an environmental permit – Part C3 varying a bespoke installation permit with Question 6 completed indicating that West Burton B and C Power Stations will comprise of 2 types of combustion plant. These being the CCGT and OCGT plants which are both classed as 'New-New' plant as application has been made after 27 November 2002.

6. Emissions to Surface Water – impact on the flow rate and effluent quality from emission point W5.

We can provide the following clarification for the details provided in the permit variation application report and also in Appendix F - WBC Outline Drainage Strategy.

There are 3 drainage options for WBC utilising the off-site purge drain which leads to the river outfall. These being:

- Option (A) Southeast connection to WBB GMX/purge line chamber 7, that is the outlet for the permitted discharge point for WBB as identified as W5 in the current permit;
- Option (B) a new Northeast connection to the off-site purge drain at chambers P3 or P4;
- Option (C) Southwest a new connection to on site WBB drain access point GU36 hence into existing WBB drainage leading to the permitted discharge point W6, the outlet of which is connected to the off-site purge drain chamber P15.

WBB is currently current permitted for two emissions to water as follows:

- W5 is permitted for 'Process effluent comprising cooling water, basin purge water and boiler feed water demineralisation effluent'. That is for what is termed the GMX 'process effluent'.
- W6 is permitted for 'Site surface water and oily water, surface water drainage via oil interceptors'. That is for what is termed the GU drainage.

In relation to the drainage options for WBC and the existing WBB permit we can explain that:

- There will be no new process effluent arising from WBC. That is any waste water comprising of turbine cleaning wash water or of closed cooling water arising for disposal will not be discharged into site drainage for emission to surface water i.e. release to the river. This waste water will be collected in containment (IBCs or tankers) before being taken off site for disposal at appropriately licenced waste treatment facilities.
- The only additional emissions to water arising from WBC will be site surface (storm) water, oily water drainage via oil interceptors and firefighting water.
- Site fire water (hydrants) will not contain any additional oil or chemicals and therefore will be collated in the WBC site GU drainage system for discharge with surface water. Contaminated firefighting water will be contained on site pending also being taken off site by tankers for disposal at appropriately licenced waste treatment facilities.
- Option (A), being one the three potential connections into the off-site purge drain leading to the river outfall, will not impact the current permitted WBB GMX process effluent as monitored at point W5. This potential design option is considered as new possible drainage connecting into the off-site purge drain at Pit 7. The WBC drainage will not go through the current WBB GMX pit monitoring point W5. Therefore there will be no change to the current WBB W5 flow rate, effluent quality and H1 assessment.
- Details of the finalised drainage drawings clearly indicating the drainage routes and emissions points for WBC will be developed as part of the design process and supplied to the Environment Agency prior to commencement of commissioning.

7. Emissions to Surface Water – H1 assessment of the impact on the receiving watercourse.

As indicated above this is not applicable as there will be no change to the emissions from point W5.

I hope you find this additional information satisfactory and if you require any further details please do not hesitate in contacting me.

Many thanks for your consideration of our application.

Kind Regards,
Michael

Michael Parker
Production Chemist
West Burton B CCGT

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Please consider the environment before printing this email

From: Blackeby, Eleanor [mailto:eleanor.blackeby@environment-agency.gov.uk]
Sent: 25 September 2019 16:45
To: Parker, Michael
Cc: Smith, Heather
Subject: EPR/CP3035MK/V008 Not Duly Made Letter

Dear Michael

Please find attached a Not Duly Made letter outlining the additional information required in order for me to duly make your application for West Burton C.

The letter sets out that you have 10 working days to respond which is by Wednesday 9 October.

If you have any questions please contact me. I will be back in the office on Monday.

Regards
Eleanor

Eleanor Blackeby MSc AIMEA
Senior Permitting Officer
Practising Environmental Regulator
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Working days: Monday to Wednesday



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