



Dear John Durkan,

**Environmental Permitting (England and Wales) Regulations 2016**

**Application reference: EPR/CP3049QY/V002**

**Operator: ANGLO BEEF PROCESSORS UK**

**Facility: ABP Kingswinford, Oak Lane, Dudley, DY6 7JS**

Thank you for your application received on 16/05/2023.

Unfortunately, the application payment you sent is incorrect.

Your application requires an assessment under the Habitats Regulations. The charge for this assessment is not included in your baseline application charge. You will therefore need to make an additional payment of £779.

You need to send us an Odour Management Plan. This should meet the requirements of our H4 Guidance (<https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>). The charge for our assessment of your plan is not included in your baseline application charge. You will therefore need to make an additional payment of £1,246.

The correct application charge is based on two different scenarios', described below:

1. The addition of a new 5.4 A(1)(a)(ii) – physico-chemical treatment of non-hazardous waste for disposal (addition of wastewater treatment plant), a substantial variation to a 6.8 activity (new boiler, removal of 7 older boilers, change of emission point references), a revised odour management plan charge (related to the new 5.4 activity) and a habitats assessment charge (related to both the replacement boiler and the new 5.4 activity).  
Breakdown as follows:
  - a. new 5.4 A(1)(a)(ii) - £13,443
  - b. substantial variation to a 6.8 activity - £12,585 ← this will apply if the emissions to air risk assessment requires detailed modelling
  - c. odour management plan charge - £1,246
  - d. habitats assessment charge - £779
2. The addition of a new 5.4 A(1)(a)(ii) – physico-chemical treatment of non-hazardous waste for disposal (addition of wastewater treatment plant), a normal variation to a 6.8

activity (new boiler, removal of 7 older boilers, change of emission point references), a revised odour management plan charge and a habitats assessment charge.

Breakdown as follows:

- a. new 5.4 A(1)(a)(ii) - £13,443
- b. normal variation to a 6.8 activity - £6,992 ← this will apply if the emissions to air risk assessment 'screens out' at the screening stage and detailed modelling is **not** required
- c. odour management plan charge - £1,246
- d. habitats assessment charge - £779

This leaves a balance of one of the two amounts shown below, to pay:

1. £28,053 - £12,585 = £15,468
2. £22,460 - £12,585 = £9,875

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions:

1. Form A
  - a. Q5c - **Director details** - document 'Attachment B' need to be revised to include directors' dates of birth (specifically for John Durkan as he has signed the declaration in Form F1), and resubmitted.  
This has been provided, thank you.
2. Form C2
  - a. Q4a – **A sewer managed by a sewerage undertaker** – we need you to confirm which Waste Water Treatment Works (WwTW) you discharge your effluent to.  
This has been provided, thank you.
  - b. Q5a – **Provide a plan or plans for the site** - we need you to revise your site plan and complete this question with a reference to the document. Ensuring the revised plan includes:
    - i. the newly proposed emission points to air and water,  
This has been provided, thank you.
    - ii. the site OS NGR,
    - iii. a revised drainage plan that includes the newly proposed wastewater treatment plant
    - iv. a plant design drawing for the newly proposed wastewater treatment plant
  - c. Q5b – **Provide a revised Site Condition Report** – we need you to submit a revised Site Condition Report that includes any new raw materials that contain 'hazardous substances' as described in our H5 guidance by:
    - i. Identifying 'relevant hazardous substances (RHS); and
    - ii. Including a stage 1-3 assessment
  - d. Q6 – **Environmental Risk Assessment**
    - i. We need you to include pests as a potential risk into the risk assessment for the newly proposed wastewater treatment plant.
    - ii. The submitted risk assessment states that '*Detailed Air Quality modelling has been carried out as part of this permit application. The results indicate the baseline air quality around the proposed installation is within European Limit Values and UK objectives*' – we need you to submit this detailed modelling report and the associated modelling files. If this is a typo, we need you to submit (at least) a risk screening for emissions to air assessment. We need you to ensure that the risk assessment has been completed in line with this guidance

the modelling has been completed in line with our [guidance](#) (and assesses risks to ecological sites).

*Reason: Under the Habitat Regulations we need you to assess the potential impacts of air quality emissions from your boiler on European, national, and locally designated conservation areas. Please refer to AQTAG 14.*

*The site currently operates 7 x 5.5kW kerosene boilers (aggregation of 38.5 kW), you wish to replace this with a 450 kW kerosene boiler. As this variation is to increase the thermal input of your on-site kerosene boilers and there is a SSSI within 1.5km of the emission point, we need you to carry out a potential impact to habitats from emissions to air 'screen', and detailed modelling if the emissions don't 'screen out'. In line with our guidance.*

- iii. We need you to submit an emissions to water risk assessment which assesses any 'hazardous pollutants' found in the discharge from the proposed upgraded Effluent Treatment Plant (ETP) to sewer in line with our [guidance](#). We need you to ensure the inclusion of:

1. Completion of application form C6 (using the discharge from the WwTW as the final discharge point).
2. Confirmation whether the newly proposed ETP will utilise biological treatment or physico-chemical treatment (screens, DAF plant, balancing tanks and sludge dewatering).

*Reason: the submitted ERA states: 'Monitoring and increasing oxygen supply ensures that the aerobic bacteria have the oxygen they need to aerobically digest BOD. This will help to control odours as anaerobic digestion will slow down.' However, everywhere else in the application states that the WwTP will utilise screens, a DAF plant and balancing tank.*

3. establish the characteristics of the wastewater stream as required by BAT 3 of the Waste Treatment BAT conclusions ensuring (at least) the following parameters are considered in the risk assessment:
  - a. (If utilising a DAF plant) any flocculants and/or coagulants that have been dosed into the effluent as part of the DAF plant.
  - b. Any boiler treatment chemicals that may be in the effluent from boiler blowdown discharges.
  - c. Any cleaning chemicals that may be in the effluent from the abattoir cleaning discharges.

### 3. Form C3

- a. Q3a – **Technical Standards** – Table 3 –

- i. inclusion of [Waste Treatment BAT conclusions document](#) for the newly proposed waste water treatment plant
- ii. revised BAT assessment which includes an assessment against the relevant parts of the waste treatment BAT conclusions document for the newly proposed wastewater treatment plant
- iii. revised BAT assessment for the inclusion of a kerosene boiler over a gas-fired boiler

*Reason: according to section 4.1.40 of the BRef guidance for Abattoirs and Slaughterhouses it is BAT to 'replace fuel oil with natural gas'.*

- b. Q3b – **General Standards** - Table 4 – we need you to submit a revised odour management plan which incorporates the newly proposed waste water treatment plant (specifically the sludge dewatering aspect).

[This has been provided, thank you.](#)

- c. Q3c – **Types and amounts of raw materials** - we need you to revise and resubmit attachment J – Raw Materials document to include any newly proposed flocculant and/or coagulant raw materials to be used in the DAF plant. We also need you to submit MSDSs for any newly proposed raw materials.

[This has been provided, thank you.](#)

- d. Q4a – **Monitoring Measures - General** - we need you to revise and submit the document 'Attachment K - Emissions Monitoring' to include the expected monitoring for the proposed emission to sewer from the newly proposed waste water treatment plant  
This may need to be revised following the completion of the H1 risk assessment for emissions to freshwater (via sewer) that includes Ferric Chloride (and any boiler blowdown or cleaning chemicals, as described in your raw materials table, which may remain in the effluent following the physical-chemical treatment).
- e. Q4b – **Monitoring Measures – Point Source Emissions to Air only** - we need you to answer this question for the monitoring point (A2) associated with the newly proposed boiler.  
This may need to be revised following the completion of the H1 risk assessment ([screening tool](#) and modelling if necessary) for emissions to air from the newly proposed boiler.
4. Form C6
- a. Q7b – we need you to answer this question taking into account the addition of ferric chloride in the WWTP.
- b. Q8e – we need you to answer this question and submit a [screening tool](#) (and modelling if any of the parameters don't 'screen out' using the tool) which includes ferric chloride (and any boiler blowdown or cleaning chemicals, as described in your raw materials table, which may remain in the effluent following the physical-chemical treatment) emissions to freshwater (via sewer) in the assessment.
5. Form F1
- a. Q1, Table 2 – **Charge Type**
- i. Reference to either a new 5.4 A (1)(a)(ii) activity with associated charge as described in earlier questions.
- ii. Reference to a normal or substantial variation to the 6.8 activity and associated charge.  
*Reason: if the emissions to air (from the newly proposed boiler) 'screen out' at the risk screening stage the variation will be a normal one, if detailed modelling is required for the emissions to air this will incur a substantial variation charge.*
- b. Q1, Table 3 – **Additional Assessment Charges**
- i. Additional assessment charge 1.19.2 – habitats assessment needs to be checked.
- ii. Additional assessment charge 1.19.6 – odour management plan needs to be checked.
- c. Q2 – **Payment** – we need this section to be revised with the correct outstanding fee as described above.
- d. Q5 - **Declaration**
- i. the 'standard facility' box needs to be unchecked as you are not applying for a 'standard facility'.
- ii. the checkbox which states 'tick this box to confirm that you understand and agree with the declaration above....' Needs to be checked.
- e. Q6 – **Application Checklist** – this table needs to be completed with any additionally submitted documents as required from the above questions.

Please reply directly to this email with your information and copy in rach.hopkin@environment-agency.gov.uk.

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days we will return your

application.

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permits-and-abstraction-licences-tables-of-charges>

If you have any questions please phone me on 07584202250 or email rach.hopkin@environment-agency.gov.uk.

Yours sincerely,  
Rach Hopkin