



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)(i) – biological 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 and a habitats assessment charge.

Breakdown as follows:

- a. new 5.4 A(1)(a)(i) - £13,984
  - b. substantial variation to a 6.8 activity - £12,585
  - 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 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 and a habitats assessment charge.

Breakdown as follows:

- a. new 5.4 A(1)(a)(ii) - £13,443
- b. substantial variation to a 6.8 activity - £12,585
- 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. £28,594 - £12,585 = £16,009

2. £28,053 - £12,585 = £15,468

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.
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.
  - 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,
    - 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. Please 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 human health and ecological sites).
    - 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.
4. The application of relevant Sewage Treatment Reduction Factors (STRFs).
5. The raw data included in the assessment.

### 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
- 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).
- 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.
- 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
- 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.

### 4. Form F1

- a. Q1, Table 2 – **Charge Type**
  - i. Reference to either a new 5.4 A (1)(a)(i) or (ii) activity (depending on effluent treatment type proposed) with associated charge as described in earlier questions.
  - ii. Reference to a substantial variation to the 6.8 activity and associated charge as described in earlier questions.
- 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