

Dwr Cymru Welsh Water EIGN STC IED Permit Application Request for further information response v2

Environment Agency reference:	EPR/UP3735GH/V003	Date:	26/04/2024
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Approved by:	Shannon Stone		

Table 1: Request for further information response

Question	Response
<p>Form C3: Variation to a bespoke installation permit.</p> <p>1: Eign EWC Codes</p> <p><i>You have requested 16 10 02 - Aqueous liquid wastes other than those mentioned in 16 10 01; Sewage sludge only for acceptance to be treated in the anaerobic digestion process.</i></p> <p><i>According to your process flow diagram, all filtrate and centrates leave the site boundary as an indirect discharge, we cannot locate how/where centrate liquor and final effluent from wastewater treatment works (16 10 02) will be accepted as part of the process.</i></p> <p>a) Provide the source of EWC code 16 10 02. b) Describe how and where you intend to accept 16 10 02 into the installation activity or confirm the removal of code 16 10 02 c) Provide justification that acceptance of 16 10 02 would not constitute co-digestion; or d) Remove this code from your application.</p>	<p>The inclusion of 16 10 02 – ‘Aqueous liquid wastes other than those mentioned in 16 10 01 Sewage sludge only’ comes as a result of some opinions on coding outlined in the EA RPS 241: Replacing the use of ‘not otherwise specified’ waste codes.</p> <p>The inclusion of the code does futureproof the site because if DEFRA agree with the proposals put forward by the EA in their Strategy for safe and sustainable sludge use, to revoke the SUIAR 1989, and bring sewage sludge recovery into the EPR regime, then what we currently view as co-treatment or co-digestion may be possible.</p> <p><u>However</u>, for the purposes of this application DCWW agree that this EWC code can be removed from the application and will apply to vary the permit at a later date, should this be necessary, under EPR.</p>

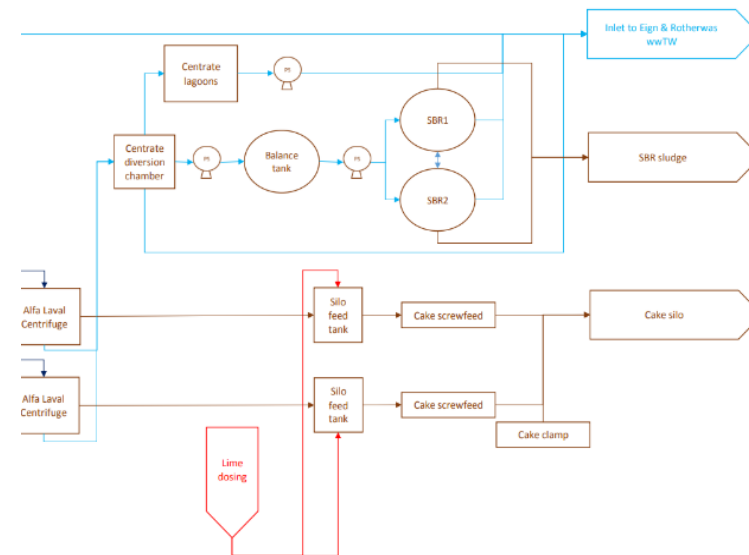
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<p>MOTT MACDONALD</p> <p>You have not provided your waste pre-acceptance and acceptance procedures</p>	
<p>e) Provide waste acceptance and pre-acceptance procedures for the installation. Please refer to Biological waste treatment: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk)</p>	<p>Waste acceptance and pre-acceptance procedures for Eign can be found in document ref: B16564-123532-ZZ-XX-PE-NA-DH0058.</p>
<p>2: Standby Generators Directly Associated Activities (DAAs)</p>	
<p>You have advised that based on current understanding the two 2.18MWth generators are considered DAA's to the installation activity. This will be confirmed on 07 February 2024 after planned shut down and dynamic testing.</p>	<p>DCWW completed the planned shutdown of Eign, running the site off of the generators. It was confirmed that the Eign generators, with both running, operates everything on site, in auto, except the CHPs (with respect to the STC).</p>
<p>a) As 07 February has now passed, confirm if the generators are DAAs to the section 5.4 activity. (please note if they are not DAAs they will need to be removed from the application)</p> <p>b) If they are DAA's to the 5.4 installation activity, provide an air quality impact assessment that takes account of the combined impact of existing and new air emissions in line with guidance Air emissions risk assessment for your environmental permit - GOV.UK (www.gov.uk).</p>	<p>Therefore, it is concluded that the two standby generators at Eign are DAA to the S5.4 installation activity and an AQRA is required.</p> <p>An Air Quality Risk Assessment has been completed and the result of its findings can be found in document ref: B16564-123532-ZZ-XX-PE-NA-DH0059.</p>
<p>Form B6 New Bespoke water discharge activity</p>	
<p>3: Effluent Treatment</p>	
<p>Question 6 states effluent is treated before reaching the inlet works in the liquor treatment plant (aka SBR's) and the process description is provided in Section 3 of Main Supporting Document. Section 3 of the Main Supporting Document does not mention any liquor treatment is taking place within the 2 SBR's but advises centrate is pumped to the SBR Balance Tank.</p>	
<p>a. Confirm what the acronym SBR stands for in this application.</p>	<p>a. SBR stands for sequencing batch reactor.</p> <p>b. Oxygen is bubbled through the wastewater to reduce biochemical oxygen demand (BOD) and chemical oxygen</p>

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- b. Confirm what liquor treatment takes place within the SBR's.
- c. Confirm if the liquor treatment on site would meet the criteria for a section 5.4 activity, or if it would be a DAA to the section 5.4 AD activity. – *In the event that the liquor treatment on site meets the criteria for a 5.4 activity the amount we refund if the application is duly made will be reduced to cover the fee for that activity.*

- c. Based on the design parameters the SBRs have a capacity to treat up to **1000m³/day** of total liquors from the STC. It is not known the actual flow through the SBRs as these are not measured. Given this total capacity figure, it is assumed that the site will treat 50tonnes or more per day of liquors and, therefore, meets the criteria for a separate S5.4 activity. A PFD is provided, for your information.



In addition, the Eign WWTW Flood Risk Assessment (March 2024) has been complete and has also been included as part of this NDM submission as document ref: **B16564-123532-ZZ-XX-AS-NA-DH0047**.