Requesting additional information

Application reference: EPR/FP3132PH/V008

Applicant: MUNTONS PLC

Facility: Cedar Maltings EPR/FP3132PH, Needham Road, Stowmarket, IP14 2AG

Response: 30th April 2024

Part C6: Application for an environmental permit Part C6 – Variation to a bespoke water discharge activity or groundwater activity (point source discharge) or point source emission to water from an installation.

Question 3f: For each answer in question 3, show how you worked out the figure on a separate sheet.

Maximum Daily Flows: Daily average from meter readings over 12 month period in 2023

Malted Ingredients	-	569 m3 per day	-
Drum Maltings	-	449 m3 per day	
Cedars Maltings	-	942 m3 per day	
Energy Centre	-	473 m3 per day	
Domestic Water	-	448 m3 per day	
Total	**-**	**2,881 m3 per day**	

Over 2,500m3 we can recirculate via the lagoon.

Projected Flow	2,500.00	m3 per day
Litres / day	2,500,000.00	litres / day
Litres / hour	104,166.67	litres / hour
Litres / Minute	1,736.11	Litres / minute
Litres / second	28.94	Litres / second

Question 5a: How far away is the nearest foul sewer from the boundary of the premises?

Question 5b2: Discharges from all other premises including trade effluent.

A check of the location of the nearest foul sewer shows that it is located adjacent to the A1120 / B1113 roundabout as shown on the accompanying plan: 1444941_A0_Wastewater. The direct distance is 280m. A logical route would mean the distance is in excess of 380m.

However, the direct route is blocked by the River Gipping, the PPG Factory site and the A1120 duel carriageway. Furthermore, when the Anaerobic Digester was built at the Muntons plc Wastewater treatment plant, discussions were held with Anglian Water as to whether it was possible to direct trade effluent to the sewer rather than build the AD plant. At the time, not only was cost prohibitive, but Anglian Water indicated that the infrastructure could not handle the quantities of effluent we were proposing to discharge.

In addition, anecdotally, we have been told that the discharge supports the River Gipping particularly in dry periods as it significantly contributes to maintaining water levels sufficient for aquatic life to survive. This has not been acknowledged formally!

Question 7e: If you have answered 'No' to any of questions 7a to 7d provide details on a separate sheet of how you have established that the effluent is not likely to contain specific substances.

We analyse the trade effluent daily on site to ensure that the effluent remains within the permit limits. Although we have never gone to the extent of having the WWTP Laboratory certified to MCERTS, nonetheless, it undertakes the same analysis as done by other MCERTS Labs.

Given the requirement for analysis via an MCERTS lab, we have weekly and monthly samples analysed by:

Eurofins Food Testing UK Ltd
Gateway House
Ammonite Drive
Needham Market
Suffolk, IP6 8EL

UKAS No: 2262

We also have Eurofins carry out analyse for Cadmium and Mercury on an annual basis which may be introduced through the use of caustic for cleaning. Since we were first issued the permit in 2005 we have not had any reportable level of either Cadmium or Mercury. A copy of the most recent analysis is attached.

Weekly samples are also tested for Iron. Although we have a threshold of 5mg/l the highest tested result in 2023 was 1.52mg/l.

Annual results and calculated kg/year for Mercury, Cadmium and Iron have all been entered into the H1 Risk Assessment spreadsheet and have Passed Test 1. A copy of the H1 Risk Assessment accompanies this report

Repeated testing has not identified any other specific substances listed in 'Risk assessment for treated sewage or trade effluent discharges to surface water or groundwater'.

This assessment should identify if there are any hazardous pollutants or sanitary pollutants in the discharge(s) and their impact, including:

- **Identification of emission points and pollutants released from the proposed facility**

  The discharge will only be through W1 as identified in the permit.

- **Data on pollutant concentrations (worst case concentrations should be assumed) and maximum & average discharge flow rates using actual measurements (with a sufficient sample size and to suitable accuracy) or if not available estimations (justification required)**

  As stated above, daily, weekly and monthly analysis is carried out of the trade effluent discharge. Daily analysis is conducted by our own non-MCERTS laboratory, and weekly and monthly analysis conducted by a UKAS accredited, MCERTS laboratory. The analysis is reported quarterly and annually to the EA as part of the existing permit. Copies of the Quarterly reports for 2023 set out on Water 1 as well as the annual report for 2023 accompany this report.

- **Data on upstream or background pollutant levels of receiving waters, river flows and the relevant EQS/EALs (only need back ground data if it didn't screen out under test 1 or test 2 of surface water pollution risk assessment for your environmental permit guidance https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit#screening-tests-freshwaters**

  Cadmium, Mercury and Iron all passed Test 1

- **Are there any habitats, species or other designations?**

  A copy of the location plan from magic.defra.gov.uk accompanies this report showing designations within 1500m of the discharge point. The Site Check report lists one Local Nature Reserve (England) as being Church Meadow, and one Site of Special Scientific Interest as being Coombs Wood. There are a number of Listed buildings also within the 1500m radius.

  The discharge will be as before to the River Gipping

Assessment for hazardous pollutants should follow the methodology set out in Environment Agency guidance.

- **Apply each environmental risk assessment screening test to determine if the substances screen out as insignificant. Use of the H1 software tool is advised and this should be submitted with the application.**

  See accompanying copy of the H1 software tool. This shows that Cadmium, Mercury and Lead in the discharge have all passed Test 1

- **For discharges to sewer, details of the trade effluent consent (i.e. any limits set, the sewage treatment works name and location of the final discharge point), Sewage Treatment Reduction Factors (STRF) used.**

  Not applicable

Accompanying Documents

- 1444941_A0_Wastewater
- Muntons - FP3132PH - Nearest sewer distance
- Muntons - FP3132PH - Designations within 1500m
- REPORTS_Chem_ST_MN_14-12-23 - Cadmium & Mercury
- Annual Reporting Forms - 2023 - Rev 00 – 240118
- H1 Assessment v8 - Final
- Quarterly Reports on Water 1
    - 1st Quarter Report - Muntons – 2023
    - 2nd Quarter Report - Muntons – 2023
    - 3rd Quarter Report - Muntons – 2023
    - 4th Quarter Report - Muntons - 2023