

Project No: IV.342.19

Date: 07/01/2022

Regulated Industry Team
Permitting Support, NPS Sheffield
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

FAO: Helen Gregory, Permitting Officer, National Permitting Service - Birmingham

Dear Helen,

Leicestershire County Council – Kibworth Recycling and Household Waste Site, Not Duly Made Additional Information Request - EPR/KB3707ML/A001

In accordance with the 'not duly made' email received on the 17th December 2021, the EA have requested additional information for the Kibworth Recycling and Household Waste Site Permit Application submitted on behalf of Leicestershire County Council. In accordance with the information request, please see the additional information below.

The information request is as follows:

Part B4

Table 2 - Emissions

The site drainage is currently non-standard for the type of activities proposed. It is possible based on the information provided in the application that you will also require a water quality permit in addition to a waste permit. If this is the case, this may delay the progress of the waste application once it is duly made and determination is underway. You may wish to consider withdrawing your application and submitting an enhanced pre-application enquiry to our water quality team to find out what permit, or alternatively what additional pollution prevention measures or revised site drainage layout, are required before resubmitting your application. With the current proposed site drainage layout, there is potential for uncovered wastes within the waste transfer station to contaminate any rainwater that ingresses the uncovered waste. This potentially polluted water is then discharged to the brook, which would require a water quality permit, however there would be no guarantee that a water quality permit would be granted for this type of discharge. For this reason, you may wish to withdraw your application and seek water quality pre-application advice. However, if you wish to proceed on this basis, we will need you to also submit part B6 of the application form and the permit application charge from table 1.3 of the charge scheme (dependent on the volume that will be discharged and what it contains) for the water quality permit application. We would need to see an analysis of what was in the runoff water and at what concentrations so that we could model appropriate limits. Please note the water quality permit would be incorporated into the waste permit.

Alternatively, if you wish to continue this application without pursuing a water quality permit, depending on the current stage of the site construction, you could consider revising the site drainage system to incorporate adequate pollution prevention measures to separately collect, and dispose of, any rainwater that has come in contact with any waste storage and treatment areas and to include additional measures to protect any high-risk spill areas where the public are depositing liquids. We would also require additional information on how the canopies have been adequately designed to stop any rainwater ingress to the stored waste areas. Cleaning of the site bays and surfacing will also need to be carefully considered and addressed to prevent any

contaminated water reaching the watercourse. These requirements are within the Non-hazardous and inert waste appropriate measures guidance. If it is your intention to revise the site drainage to address these concerns, please confirm this. If this is confirmed then we would not seek the water quality permit application forms and fee at the duly making stage but may however request them at the determination stage if the revisions are found to be inadequate to control the pollution risk. Please note as this information will be requested at the determination stage this is likely to cause delays and you are therefore advised to start preparing this information whilst you await your application to be allocated to a determining officer.

We confirm that we choose the second option and wish to continue with the application without pursuing a water quality permit.

Table 3a: You have correctly referenced both the chemical waste appropriate measures guidance and the non-hazardous and inert waste appropriate measures guidance in this table. However, for both sets of measures you also need to either agree that the measures in the guide will be fulfilled or provide alternative measures listed in Table 3a. If this information does not fit within the table on the form, you may provide these details on a separate sheet and reference it in Table 3a.

Please find the updated Part B4 form attached. In regards to Table 3a and the clarification you provided on this question via email dated 21st December 2021, we confirm that our proposed measures do not deviate from those listed in the guidance provided in Table 3a.

Table 3b: please remove the Noise Management Plan from this table for the reasons explained in the section under 'charge' below.

The Noise Management Plan reference has been removed from Table 3b, please see the attached updated application form Part B4.

Part F1

Charge

Unfortunately, the application payment you sent is incorrect. The charge for 1.16.9 is £3,965 rather than the £3,695 stated on the form. Also, you have paid for a noise management plan (NMP) to be assessed which our screening has shown is not required for this application. The £1,246 will therefore be returned to you. We will hold the NMP on file. In the unlikely event that the determining officer does decide that there are potential noise issues, they will request the fee at that time. The application charge is therefore £15,623. Therefore £976 will be returned to you.

We acknowledge the above and appreciate you arranging the refund.

Declaration

Please provide evidence that Andrew Harper has the authority to sign on behalf of the council. If he does not someone in a more senior position within the council will need to sign the declaration, for example the Director of Environment and Transport.

Please find attached the updated Part F1. Note that Joanne Guyll (Assistant Director for Environment & Waste Management) has the authority to sign this declaration, which has been updated accordingly. We have also taken the opportunity to update the relevant tables to reflect the correct fee as outlined above.

Odour Management Plan (OMP)

Please revise your OMP as follows:

Include a complete inventory of odorous materials held on site, as feedstock's, raw materials, intermediates and waste. To include:

- *Quantity limits (waste reception, in treatment and product if applicable);*
- *Waste types & quantities, including description and EWC;*
- *Source/s of waste/s;*
- *Age of waste;*
- *Storage / treatment method and location;*
- *Storage time limits;*
- *Associated monitoring and records for all of the above*

As discussed and confirmed by yourself via email dated 20th December 2021, the requested information is contained within section 4.7 of the OMP and it is satisfactory for duly making purposes.

Other

Form Part B2:

The Continuing Competence (CC) certificate submitted with the application expires on 16/01/2022. Please note that you will need to submit a new CC certificate prior to any permit being issued.

Thank you, we acknowledge the above.

I trust this provides the information requested by the Environment Agency and that the application can now be duly made. If you have any additional questions, please don't hesitate to contact me.

Yours Sincerely,

Justyna Krawczynska
Senior Waste & Permitting Consultant
Ivy House Environmental