

Ellington Road AD Facility

784-B042442

Non-Technical Summary

Environmental Permit Variation Application

SUEZ Recycling and Recovery UK Ltd

November 2023

**Document prepared on behalf of Tetra Tech Limited. Registered in England number:
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1.0 NON-TECHNICAL SUMMARY

1.1 PERMIT APPLICATION

- 1.1.1 This Environmental Permit Application has been prepared by Tetra Tech on behalf of the Operator, SUEZ Recycling & Recovery UK Ltd (SUEZ), in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016 as amended. It is a requirement of these Regulations that any application is accompanied by a Non-Technical Summary of the submitted documentation.
- 1.1.2 The application relates to SUEZ's permitted facility at Ellington Road (the site), New Moor, Northumberland, NE63 9XS at approximate National Grid Reference (NGR) NZ 25800 89200. The site is currently regulated under a bespoke Environmental permit (EPR/FP3934WZ) which allows the operation of an In-Vessel Composting (IVC) facility and an Open Windrow Composting facility as Schedule 1 activities. It also allows the operation of a wood shredding facility and a street sweeping waste transfer station which are undertaken as waste operations.
- 1.1.3 The feedstock for the IVC originally came from SUEZ's operations at their Byker Reclamation Plant. Following modifications at the Byker facility, the IVC at Ellington Road is no longer receiving feedstock from the Byker facility.
- 1.1.4 Subsequently, SUEZ are now seeking to vary the environmental permit to remove the IVC activity and allow the operation of an Anaerobic Digestion (AD) plant to process food waste from household waste collections as well as industrial and commercial customers. The process will generate biogas which then ultimately feeds into a biogas upgrading plant to National Gas Grid criteria and injected into the gas grid. Alternatively, the biogas may be processed by a Combined Heat and Power (CHP) engine to generate heat and electricity that would be used by the AD plant. The CHP engine will have a capacity more than 1 megawatt thermal (MWth) and less than 50MWth. As such, it's considered that the CHP engine will be subject to the Medium Combustion Plant Directive (MCPD) and therefore will comprise a 1.2 MW MCP with a specified generator (SG).
- 1.1.5 This application is accompanied by all relevant documentation, as required by the aforementioned Regulations, and in the format set out in the Environment Agency's (EA) guidance documents. Details of the supporting documents are provided in the following section.

2.0 SUPPORTING INFORMATION

2.1 PRE-APPLICATION DISCUSSIONS

Part C2, Question 1a

- 2.1.1 A request, basic pre-application advice (EPR/FP3934WZ/V007) was requested from the EA for this application. A copy of the advice letter is provided as Appendix B of the Environmental Permit Application.

2.2 APPLICATION FORMS

- 2.2.1 As detailed in the basic pre-application advice letter, it was advised that application forms Part A, C2, C3, F1 and Appendix 1 of the Part C2.5 form would be required as part of the proposed application. The forms are provided as Appendix A of this application.

2.3 TYPE OF VARIATION

Part C2, Question 2a

- 2.3.1 According to the basic pre-application advice letter, the EA have advised that the variation would comprise a substantial variation.

2.4 ABILITY AS AN OPERATOR

Part C2, Section 3

- 2.4.1 According to the guidance notes that accompany the Part C2 application form, all of Section 3 needs to be provided if the proposal involves the addition of a waste installation or waste operations to a permit that has not previously had them. As such, details regarding SUEZ's technical competence, relevant offences and management systems are provided in an additional sheet titled 'Operator Ability' which is provided as part of Appendix A.

2.5 SITE PLAN

Part C2, Question 5a

- 2.5.1 In accordance with the guidance notes provided in Part C2 application form, a site plan is required if the proposal involves any changes to the permitted area. As such, a site layout plan (Drawing Reference 1440_PL100) has been prepared which details the proposed site layout for the operation of the AD facility.

2.6 FIRE PREVENTION PLAN

Part C2, Questions 5d and 5e

- 2.6.1 According to the EA's 'Fire Prevention Plans: Environmental Permits' guidance (updated in January 2021), Section 3 indicates that a Fire Prevention Plan is not required for wet AD processes. The proposed AD process at the site will comprise a wet process and therefore it's considered that a Fire Prevention Plan is not required to support this application. This was agreed by the EA as part of their pre-application advice.

2.7 SITE CONDITION REPORT

Part C2, Question 5f

A Site Condition Report (Appendix H) has been prepared to detail the condition of the land and groundwater within the application area. The document has been prepared in accordance with EA's H5 Site Condition Report Template.

2.8 ENVIRONMENTAL RISK ASSESSMENT

Part C2, Question 6

- 2.8.1 An Environmental Risk Assessment (Appendix D) has been prepared to consider the potential impact of the proposed activity. The Environmental Risk Assessment (ERA) is concerned with the nature and extent of any linkages between the source of any environmental hazards and the receptors which may be susceptible to harm; such linkages being termed pathways. Where potential for harm is identified, the assessment identifies the management techniques which will be utilised to mitigate such impacts.
- 2.8.2 In addition, the operation of the AD Plant will comprise emission points to air. As such, an Air Quality Assessment (Appendix E of the Environmental Permit Application) has been undertaken to assess the potential impact on air quality associated with the proposed activity.

2.9 ACTIVITIES SUBJECT TO VARIATION

Part C3, Question 1

- 2.9.1 As mentioned in Section 1, SUEZ are seeking to vary the environmental permit to remove the IVC activity and allow the operation of an AD facility. Details regarding the operation and management of the AD facility are provided in the Best Available Techniques and Operating Techniques (BATOT) (Appendix C of the Environmental Permit application).

2.10 OPERATING TECHNIQUES

Part C3, Table 3

- 2.10.1 A BATOT document has been prepared that describes both the operating techniques that will be implemented at the AD facility and also demonstrate how BAT will be employed in accordance with the following:-
- Environment Agency - Biological waste treatment: appropriate measures for permitted facilities (September 2022)
 - European Commission's BAT Reference (BREF) Document for Waste Treatment (August 2018); and
 - European Commission's BAT Conclusion for Waste Treatment (August 2018).
- 2.10.2 A copy of the BATOT is provided as Appendix C of the Environmental Permit Application.

2.11 GENERAL REQUIREMENTS

Part C3, Table 3b

- 2.11.1 According to the EA's 'Control and monitor emissions for your environmental permit' guidance, a dust management plan is only required for biowaste treatment facilities if the waste is kept and treated in the open. Although SUEZ are permitted to treat biowaste in the open as part of the Open Windrow Composting facility, there will be no proposed changes to the operational characteristics to this activity. In addition, SUEZ do not propose any changes to the wood shredding facility or the street sweeping waste transfer station that are currently permitted at the site.

- 2.11.2 For the proposed AD process, the waste will be stored and treated within the confines of a building. In addition, the AD plant will comprise a wet process and therefore the risk of dust is expected to be low.
- 2.11.3 In light of the above, it's considered that the risk of dust is not expected to increase and therefore a dust management plan has not been prepared to support this application.
- 2.11.4 An Odour Management Plan (Appendix F of the Environmental Permit Application) has been prepared in accordance with the EA's Odour Management Plan' template (Version 2, May 2021).
- 2.11.5 A request for pre-application advice was submitted to the EA to confirm whether the proposal would require a Noise Impact Assessment (NIA) and a Noise Management Plan (NMP). In response, the EA confirmed that a NIA and NMP will not be required. Nevertheless, noise has been addressed as part of the Environmental Risk Assessment (Appendix D of the Environmental Permit Application).
- 2.11.6 Due to the nature of the proposed facility, a Pest Management Plan has been prepared and is provided as Appendix H of the Environmental Permit Application.
- 2.11.7 With reference to the EA's 'Biological waste treatment: appropriate measures for permitted facilities', Section 11.4 indicates that a site specific bioaerosol risk assessment is only required if a facility is within 250m of a sensitive receptor. The nearest sensitive receptor to the site is located approximately 660m of the site. As such, it's considered that a site specific bioaerosol risk assessment is not required to support this application and was agreed by the EA as part of their pre-application advice.

2.12 MONITORING

Part C3, Question 4

- 2.12.1 As noted in Section 2.8, the proposal will comprise emission points to air. Details regarding the proposed monitoring arrangement are provided in the BATOT (Appendix C of the Environmental Permit Application)

2.13 APPLICATION FEES

Part F1, Question 1

- 2.13.1 Based on the advice that was provided in the pre-application advice letter and the additional documents that have been prepared to support this application, it's considered that the application fee will comprise the following: -

Table 1: Summary of Application Fees

Activity Reference	Description	Application Type	Fee
1.16.2.1	Section 5.4(b)(i) - non-hazardous waste installation- biological treatment	Substantial variation	£12,586
1.19.4	Pest Management Plan	-	£1,241
1.19.6	Odour Management Plan	-	£1,246
1.19.2	Habitats Assessment	-	£779
Total			£15,852

DRAWINGS

Proposed Site Layout – 1440_PL100

APPENDICES

APPENDIX A - APPLICATION FORMS

APPENDIX B – PRE-APPLICATION DISCUSSIONS WITH THE EA

APPENDIX C – BATOT DOCUMENT

APPENDIX D – ENVIRONMENTAL RISK ASSESSMENT

APPENDIX E – AIR QUALITY ASSESSMENT

APPENDIX F – ODOUR MANAGEMENT PLAN

APPENDIX G – PEST MANAGEMENT PLAN

APPENDIX H – SITE CONDITION REPORT