

Our ref: AC/NT14520/LET 003  
Your ref: EPR/QP3600MY/A001

Date: 29 September 2021

Tom Tarttelin  
National Permitting Service  
Environment Agency  
Quadrant 2  
99 Parkway Avenue  
Parkway Business Park  
Sheffield  
S9 4WF

Dear Tom

**EPR/QP3600MY/A001 Northumberland County Council, Powburn Depot**

Following your e-mail requesting further information in order to duly make the above application please find our response below.

***The overriding issue is that the wrong kind of application has been submitted. Please amend your permit documents to reflect a substantial variation on the underlying waste site (EAWML 100224) to add the AWCCT installation in a consolidated installation permit.***

We understand why you consider it is preferable to have one permit for the site. Please find enclosed forms C2, C3, C4 and an updated F1, changing the type of application from a new permit to a substantial change to the existing permit, EAWML 100224. We assume that form A1 will be as previously submitted.

***Please pay the outstanding fee of £779 for a habitats assessment.***

John Hunter has been in touch with you to confirm that the £779 is being paid directly by the Council and will be in the Environment Agency's account this week.

***Provide a summary of your EMS- this may just be a list of the different sections in the document.***

A short document providing a summary of the EMS that will be in place is enclosed.

***Provide evidence that the site's proposed TCM is enrolled on the correct Wamitab course.***

I understand that John Hunter has been in touch with you, confirming that Michael McMonagle will be the first to complete his WAMITAB assessment. He has an assessment





this week to cover units OSC01 UPK ATN, OSC02 UPK ATN, OSC05 UPK ATN, OSC06 UPK ATN, OSC07 UPK ATN and OSC08 UPK ATN. These will be signed off by the AT NERAC IQA.

***Provide A H1 risk assessment for aerial emissions from the small generator used on site. Both human and ecological receptors should be taken into account***

An H1 assessment of the emissions from the generator has been carried out. This is currently being finalised and will be forwarded on to you shortly.

***Provide proposals for monitoring your point source emissions based on BAT.***

The BAT conclusions for waste treatment suggest that channelled emissions to air should be monitored for hydrogen sulphide and ammonia. In this case the site does not accept biodegradable waste and it is not expected that there will be any point source emissions of these chemicals.

The only potential point source emissions to air will be from the breathing vents on the cement silos and from the generator. The generator will operate using diesel and is rated at around 60kVa. Due to its small size, there are no plans to monitor these emissions. The plant will be designed to conform to emission limits set under the Non-Road Mobile Machinery Regulations.

Emissions from the cement silo may happen when there is a change of air pressure during filling of the silo. To guard against dust entering the atmosphere a dust filter will be provided at the vent. As these emissions would occur only occasionally, during deliveries, there are no plans for monitoring of emissions. Standard dust filters for cement silos generally ensure that emissions of dust are kept to <10mg/m<sup>3</sup>.

Fugitive emissions of dust and odour will be monitored by routine visual and olfactory site inspections.

***Provide process flow diagrams of your activities.***

A process flow diagram is enclosed.

***Provide a new site plan with the position of emission points labelled (e.g. A1 for air emission point from the generator)***

The site boundary drawing has been updated to include point A1, the emission point from the generator and points A2 and A3, the emission point/s from the cement and/or PFA silos.

Please note that this is an approximation only. Because the waste treatment plant is brought to site on a temporary basis, to cover a treatment campaign over the summer, the exact configuration of the plant and location of the emission points to air may change. The plant will always be located within that northeast area of the site where the impermeable surfacing and sealed drain to the sump is provided.

***Provide a waste minimisation review.***

A waste minimisation review is enclosed.



We trust that this provides the information that you need to consider the application duly made but please contact me should you require any further clarification.

**Yours sincerely**  
**for Wardell Armstrong LLP**

A handwritten signature in black ink, appearing to read 'Alison Cook', with a stylized flourish at the end.

**ALISON COOK**  
**Associate Director**  
**[acook@wardell-armstrong.com](mailto:acook@wardell-armstrong.com)**