

Land & Mineral Management
Roundhouse Cottages
Bridge Street
Frome
BA11 1BE

Our ref: EPR/KP3902MB/A001
Your ref: PSCAPPDAYGR001

Date: 13/03/2023

Dear Mrs Lesley Loane,

We need more information about your application and Underpayment of application charge.

Application reference: EPR/KP3902MB/A001

Operator: Day Group Limited

Facility: Wellingborough Aggregate Recycling and HBM Facility

Thank you for your application received on 16/05/2022. The following is to confirm our conversation of 21/02/2023.

To address your query regarding Part B operations on Part A installation sites, in accordance with DEFRA's General Guidance Manual (see link below) regulation of a Part B activity can automatically revert to the Environment Agency by default when it takes place on an A1 installation site.

Policy and Procedures for A2 and B Installations', page 28, section 2.19, April 2012.

[Environmental Permitting \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614442/Policy_and_Procedures_for_A2_and_B_Installations.pdf)

Based on the above, you have requested to add a Section 3.1, Part B (b) activity for the production of HBM material that will include the blending of cement in bulk. The fee for this activity has not been submitted, please refer to reference 1.18.2 in our charging scheme:

[The Environment Agency \(Environmental Permitting and Abstraction Licensing\) \(England\) Charging Scheme 2022 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614442/Policy_and_Procedures_for_A2_and_B_Installations.pdf)

Unfortunately, the application payment you sent is therefore incorrect. The correct application charge is £ 17,273.00. This leaves a balance of £ 1,650.00 to pay.

In addition, I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information:

1) **Best available techniques (BAT)**

Application form Part B3 section 3 operating techniques requires you to confirm the Best Available Techniques you are planning to use and where the technical guidance (e.g. BAT conclusions) has a choice of standards or if you choose to use an alternative standard you must provide justification in a separate document.

You have not provided a demonstration as to how you will comply with the relevant Best Available Techniques in line with the latest guidance and standards. Note this must cover any emissions management techniques and abatement systems.

In line with Application form Part B3 section 3 and the guidance and standards listed in that section, provide a BAT assessment document to confirm which standards you will meet and where required explain how you are meeting Best Available Techniques (BAT).

Please note relevant standards below:

- [Waste Incineration BAT Conclusions](#)

Please also see attached some relevant DRAFT guidance on IBA BAT to assist you, this includes:

- 220220 BATC returns spreadsheet V1.5 IBA
- DRAFT_IBA Storage and treatment guide

2) **Plant onsite including generators and abatement systems**

a) **Emission points**

Application form B3 section 2 requires you to state the emissions from the process and plant associated with the process. In document Aggregate Processing Plant, Wellingborough Dust and Emissions Management Plan you have stated that a generator is used on site. In addition, the site layout plan provided indicates the presence of an abatement system.

Please resubmit application form B3 listing all generators and energy producing plant on site as well as any another other emissions points e.g. abatement systems.

b) **Combustion and energy generating plant**

In your document Aggregate Processing Plant, Wellingborough Dust and Emissions Management Plan you have stated that a generator is used on site.

- i) **Confirm how many generators/combustion plants you have on-site and confirm the following for each plant.**
 - a. Type of plant (boiler, turbine or engine)
 - b. Type of fuel that is burnt
 - c. Size in terms of rated thermal input
 - d. How often is it used
- ii) If there are plant onsite which release emissions to air, **please resubmit application form B3 section 2 outlining all the emissions to air from the site and their details.**
- iii) Emissions to air must be accounted for in your risk assessment and screened in line with the EA guidance [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#)
Please review the relevant sections of this guidance and provide a risk assessment and screening for any point source air emissions on site.

- iv) If there are energy generating plant on site, you need to determine based on the thermal input of the plant whether medium combustion plant regulations apply.

If the plant is greater than 1MWth please complete application form B2.5:
[Application for an environmental permit: part B2.5 new bespoke medium combustion plant and specified generator permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/application-for-an-environmental-permit-part-b2.5-new-bespoke-medium-combustion-plant-and-specified-generator-permit)

3) Operator name on documents

A number of documents including the Dust and Emissions Management Plan, Air Quality Assessment, Noise Impact Assessment, Preliminary Ecological Appraisal, Site plans have been submitted listing the operator as Covanta.

- a) **Please clarify what the relationship is between Covanta and Day Group Limited?**
b) **Please update these reports to name Day Group Limited if necessary.**

4) Water discharge to foul sewer

Your email (27/03/2023) advised us to disregard the H1 technical Note and the H1 spreadsheet as they are applicable only where there is a discharge dealt with by a WWTW. This suggests there should be no discharge to sewer from the process. However, the updated drainage drawing (WE001-03 Rev16 site plan of proposed drainage and paving), still seems to show discharges from operations (wheel wash pit) to foul sewer.

Please confirm whether there will be discharges to sewer from infrastructure associated with the process (excluding amenities).

5) Surface water

In addition to the sewer discharges, the revised site proposed drainage plan (WE001-03 Rev16) does not give enough detail as to how the site drainage is designed to manage runoff from processing areas and it does not indicate appropriate segregation of potentially contaminated run off. For example:

- In paving area 1 the direction of drainage and where it drains to is not shown.
- Settlement Pit 1 is in a processing area (Paving Zone 2) however appears to drain to surface water.
- There is no indication as to how potential contaminated and uncontaminated wastewater streams are segregated.

Please provide a summary and a revised plan (if required) addressing the above.

6) **Environmental Management System (EMS)**

Application form Part B2 Section 3d requires a summary of your EMS in line with our guidance: [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits).

There are several omissions in the EMS summary you have provided including:

- Change in climate
- Waste storage plan
- Accident prevention and management plan
- Site infrastructure plan

Please submit a revised summary of your environmental management system which includes the above aspects of our development a management system guidance.

7) **Dust management plan**

The dust management plan is missing some of the significant aspects outlined in our guidance on controlling emissions (see link below for further guidance)

[Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit)

- a) The Site plan WE001-05 details a wet scrubber filtration system, this is not described in the dust management plan. The DEMP must contain details of its process operation, process monitoring, layout, emission points. *Note why the extraction abatement is BAT and suitable based on the site's capacity also needs to be addressed in the application.*
- b) Your DEMP does not identify all other local contributors of dust and emissions on a location map and discuss their potential interaction with the site.
- c) The DEMP does not provide a comprehensive demonstration of control measures in relations to the dust control methods. Our guidance needs to be reviewed and all relevant control measures need to be referenced. *Note we will review the measures and their individual applicability at determination.*

Please provide an amended Dust and Emissions Management Plan (DEMP) which addresses the issues outlined above.

8) **Noise management and assessment**

Your noise impact assessment and associated documents do not contain sufficient detail for us to audit your assessment. Please see our guidance on noise impact assessment on the link below:

[Noise impact assessments involving calculations or modelling - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/noise-impact-assessments-involving-calculations-or-modelling)

Please provide the following information to support your noise impact assessment.

- Either modelling files or spreadsheet calculations and clearly state any assumptions used in the computer model or spreadsheet.
- Background sound monitoring locations and raw survey data in an Excel spreadsheet format.
- Raw background sound level measurements in an Excel spreadsheet format.
- A clear and full description of site layout to inform the Noise Impact Assessment.
- A detailed discussion of the soundscape (the existing sound climate) is required to evidence your decisions on the use of context.
- National Grid references for all location data: noise emitting buildings, all site buildings, off-site buildings, site acoustic barriers, fixed and mobile plant, site traffic and noise receptors.

Please send the information, quoting the above application reference, to:

Email address: psc@environment-agency.gov.uk

Postal address:

Integrated Permitting Services

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form.

If we do not receive the information and payment within 10 working days, we will return your application.

If we do receive the requested information and payment within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

If you have any questions, please phone me on 0744 288 1946 or email thomas.proudfoot@environment-agency.gov.uk.

Yours sincerely

Thomas Proudfoot
Permitting Officer