

Responses to EA letter 13 03 2023

HBM

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:

By email of 21st Feb, Day Group confirmed they were taking this out of the Permit application. If at any time in the future they decide to operate the HBM plant, they will obtain the necessary consents before doing so. Form B3 has been updated to reflect this and to reflect the change to the drainage arrangement advised by email 27th February 2023.

1) Best available techniques (BAT)

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).

Form B3 says : *If you use the standards set out in the relevant BAT conclusion(s), BAT reference document(s) (BREF) and/or technical guidance(s) (TGN) there is no need to justify using them within your documents in Table 3a.*

BAT Assessment of Compliance

BAT 1 – An EMS is provided.

BAT 10 -IBA quality monitored during maturation and the IBA will be subject to further testing in accordance to indicate its compliance with EN13242. This testing will be for the physical properties of the final aggregate following processing.

BAT 23 requires that to prevent or reduce diffuse dust emissions to air from the treatment of slags and bottom ashes, BAT is to include in the Environment Management System the following diffuse dust emissions management features: • identification of the most relevant diffuse dust emission sources • definition and implementation of appropriate actions and techniques to prevent or reduce diffuse emissions over a given time frame. The DEMP fulfils this requirement

BAT 24 requires that in order to prevent or reduce diffuse dust emissions to air from the treatment of slags and bottom ashes, BAT is to use an appropriate combination of the techniques given below:

- (a) Enclose and cover equipment
- (b) Limit height of discharge
- (c) Protect stockpiles against prevailing winds
- (d) Use water sprays
- (e) Optimise moisture content
- (f) Operate under sub-atmospheric pressure (dry or low moisture ashes only)

The DEMP covers these techniques as follows:

- (a) The processing of Incinerator Bottom Ash (IBA) will be within enclosed buildings

(b) Moving discharge heights has not been widely adopted due to impracticalities , however a rubber sock enclosing a dust suppressing "Halo" at the end of the conveyor, which has proved effective at other sites.

(c) IBA will be stored and matured in a building; the IBAA stocking area is enclosed by retaining walls to protect it from the wind.

(d) Water spray dust suppression system used on all potentially dusty areas and materials

(e) The IBA must be damp for the weathering process to be maintained. The Operator will regularly test the physical parameters of the received IBA, including water content. This ensures that the imported material is suitable for treatment and whether additional water is required to facilitate the maturation process. The moisture content of the IBAA is also monitored and additional water added if necessary to prevent dust release.

(f) The loading hopper from the maturation building has a filtration system, however the process does not operate under negative pressure as the ash is not dry, and where it is loaded into the hopper, moisture and steam arising are the principle emissions dealt with.

The combination of techniques proposed meet the requirement of BAT 24.

BAT 26 requires the use of a bag filter on *"channelled dust emissions to air from the enclosed treatment of slags and bottom ashes with extraction of air"* and sets a dust BAT-AEL. However, as this is not a dry IBA processing plant, there is no requirement for the enclosed processing areas to be under negative pressure, with associated extraction of air and so BAT 26 does not apply. Furthermore the wet scrubber system is associated with loading a hopper for transfer of IBA, not treatment. A bag filter does not function efficiently when IBA has a moisture content of that to be received at Wellingborough.

BAT 36 – Treatment to increase resource efficiency – Process uses ageing, screening, metal separation, crushing and picking which are appropriate.

BAT 37 states that in order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to use one or a combination of the techniques given below:

- a. Appropriate location of equipment and buildings
- b. Operational measures
- c. Low-noise equipment
- d. Noise attenuation
- e. Noise control equipment/infrastructure.

The NMP includes the noise control measures that are necessary considering the site's location and distance from any noise sensitive receptors. These include

- Plant orientation designed such that as far as reasonably practicable vehicle movements and loading in the IBA/HBM storage area is as far away as possible from the dwelling at Farm Cottage and Romadale on The Slips;
- Enclosure of IBA/HBM material handling and processing;
- Utilisation of the latest wheeled loading shovels and excavators operated by Vocational Qualification trained staff with maintenance functions performed by supplier engineers;
- Installation of white noise reversing indicators on trucks and wheeled loading shovels;
- and
- Training for operators with reference to revving of engines and generation of unnecessary noise, i.e. use of horns.

The measures proposed meet the requirement of BAT 37.

Form B3 has been updated to confirm BAT compliance.

2) Plant onsite including generators and abatement systems

a) Emission points

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.

Form B3 has been updated to include the generator as a DAA. Further detail on the wet scrubber is included in the DEMP, it has not been added as a DAA on B3, as it is a separate element of the operations.

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) - A back up / emergency generator

b. Type of fuel that is burnt - gas oil or diesel

c. Size in terms of rated thermal input - It is likely that the generator will be rated at 65.0 kVA/52.0 kW which above suggests a 0.182MWth rating so well below the 1MWth rating for MCP.

d. How often is it used - in the event of an electrical power failure. The amount of testing will be less than 50 hours per year and in accordance with guidance provided by the manufacturer.

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.

As noted above the DEMP has been updated to address the wet scrubber. Form B3 simply cannot accommodate the text needed to answer this point.

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.

The air quality risk assessment provided to meet the requirements of the Environmental Impact Assessment regulations accounted for the inclusion of the wet scrubber filtration system in the assessment of the overall risk to air quality from the IBA recycling facility, although the contribution from this element of the operations is extremely small as it's primary function is to manage moisture and steam where IBA is loaded out of the maturation building. The AQA is provided with this response for clarification of this point.

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

See above generator falls below requirements of the medium combustion plant regulations.

3) Operator name on documents

Please clarify what the relationship is between Covanta and Day Group Limited? – Encyclis (was Covanta) and the Day Group are working collaboratively to secure planning and permitting for the IBA Recovery Facility with Covanta having taken the lead on planning submissions, and the Day Group on Permitting at they will be the operator of the facility.

Please update these reports to name Day Group Limited if necessary. – It isn't considered necessary to update any of the documents. Those that will form the EMS will be updated post Permitting and prior to operations commencing and any changes necessary at that time can be incorporated.

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)

There is no discharge to foul sewer from the process. The wheel wash is not considered to be part of the process and the area does not storage or treat any waste.

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.*
Paving zone 1 is within the maturation building and therefore fully covered. The building drains via a central fall to a gully shown on the drawing, the gully is emptied to an appropriate licenced facility as needed, but very little moisture leaches from the IBA.
- *Settlement Pit 1 is in a processing area (Paving Zone 2) however appears to drain to surface water.*
There is no external processing, all IBA is contained within the buildings whilst being processed, therefore the external paving to these areas does not come into contact with waste and can drain to surface water.
- *There is no indication as to how potential contaminated and uncontaminated wastewater streams are segregated.* Aside from Paving Zone 1 as noted above, the only area which has the potential to give rise to surface water that has been in contact with IBAA or IBA is Paving Zone 3, that is impermeably surfaced, largely surrounded by the storage bays and falls to settlement pit 2. Segregation of the various zones across the site is by the fall of the surfacing. The methods employed on managing surface water run-off are those agreed by the EA and in use at other similar IBA recovery facilities, which is why they have been included in the design of this site.

Please provide a summary and a revised plan (if required) addressing the above. – A revised plan is not required.

6) Environmental Management System (EMS)

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

- *Change in climate* – This is an over arching point, included in the guidance rather than a specific heading to be included in the site management plan. The current proposals deal with the predicted rain fall (including a climate allowance) and include sufficient dust mitigation for varying weather types. The regular reviews of the EMS as well as the external audits will ensure that any adaptations to the management in place as a result of a changing climate are incorporated.
- *Waste storage plan* – Section 2.13 has been updated to reference it as a waste storage plan, rather than simply waste storage. As an EMS outline further details can be added prior to operations commencing.
- *Accident prevention and management plan* – Sections 8 and 9 updated to Environmental Accidents, and covers the prevention as well as actions in the event of such an incident.
- *Site infrastructure plan* - The site layout plan and the drainage plan forming part of the outline / summary EMS contain the relevant details required as noted under the heading “site infrastructures plan” at the current .gov.uk guidance page. Further plans will supersede these as the EMS is reviewed and updated through the life of the site, particularly following the construction of the facility when as built information will be available..

Please submit a revised summary of your environmental management system which includes the above aspects of our development a management system guidance. -Attached v0.6 23 03 2023.

7) Dust management plan - to follow

8) Noise management and assessment – see attachments