

Andrew Padgett,
United Utilities Water Limited
Haweswater House
Lingley Mere Business Park,
Lingley Green Avenue
Great Sankey
Warrington
WA5 3LP

Our ref: EPR/XP3337QR/V003

Date: 30th September 2022

Dear Andrew,

We need more information about your application and to address an overpayment of application charge

Application reference: EPR/XP3337QR/V003

Operator: United Utilities Water Limited

Facility: Southport Wastewater Treatment Works, Marine Drive, Crossens, Southport, PR9 9YL

Thank you for your application received on 14/09/2022.

You have provided a payment of £21,215. The correct application charge is £17,250, as such we will be refunding £3,965. Further guidance in relation to application charges can be located at: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance> The application charge is made up as follows:

Application Fee

- £13,984 application fee for - S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.

Additional Assessments (see below for further details)

- Odour management plan – a fixed charge of £1,246
- Habitats Assessment - £779
- Emissions Management Plan – a fixed charge of £1,241

Under guidance [Environmental permits: when and how you are charged - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/environmental-permits-when-and-how-you-are-charged) you would need a substantial variation if the variation if you want to make would make that activity a part A(1) activity in its own right. As such your application will be for a substantial variation not a normal variation.

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 to the following questions.

Permitting and Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF
Customer Contact Centre: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

1. Emission to Air

- a) You have identified two auxiliary boilers (emission point A8 and A9) which are not included in your current permit issued 16/01/2020. Guidance [Medium combustion plant: when you need a permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-when-you-need-a-permit) sets out the dates for new and existing Medium Combustion Plant (MCP) and applicable compliance dates.
- i. Provide proof of the date the two boilers were put into operation. The record must be traceable to the combustion unit via a unique identifier such as a serial number or manufacturer's name plate.
 - ii. If the boilers are new medium combustion plant, provide an air quality impact assessment that takes account of the combined impact of existing and new air emissions in line with guidance [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit).
- b) If you are applying to add your boilers (as new MCPs) as part of your application, complete and submit form C2.5 and provide the required supporting information specified in the form: [Application for an environmental permit: part C2.5 vary to add a new MCP/SG or change an existing MCP or SG permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/application-for-an-environmental-permit-part-c2.5-vary-to-add-a-new-mcp-sg-or-change-an-existing-mcp-or-sg-permit).

2. Provide Information Specified in application Form – Part C2

- a) Question 5a – Site Plans – You have provided the following site plans, Appendix C: Site Boundary and Layout Plan, Appendix D: Emission Points Plans, and Appendix H: Site Surfacing Plan. On assessment of these plans they do not include all of the land on which your activities take place. i.e. the containment solutions proposed in 'Secondary Containment Modelling Assessment' dated 08/09/2022.
- i. Update Appendix C; Site Boundary and layout plan to include all areas on which all the installation activities take place.
 - ii. Update Appendix D; Emission Point Plans to include all areas on which the activities take place.
 - iii. Update Appendix H: Site Surfacing Plan to include all areas on which the activities take place.
 - iv. Ensure all relevant management plans i.e. odour management plan, bioaerosol management plan, LDAR plan include all areas on which the activities take place.

Note: (For information only) . Under guidance [Develop a management system: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/develop-a-management-system-environmental-permits) your plan must show buildings and other main constructions, and points designated to control pollution which would include your proposed containment solutions. It should be noted that any permit issued would regulate activities applied for, which would be identified in table S1.1 of the permit. Should assets be included that do not form part of the installation activities being applied for (as a result of the containment boundary), they should be clearly identified, but would not be regulated under the issued permit as they would not form part of the installation activity.

- b) Question 5b – Site report – You have provided in response to this question section '10. Site Condition Report', and referenced Appendix C,D and H as supporting documentation. As such your site condition report does not include all of the land on which your activities will take place. Update your site condition report to include the full site location where activities will take place. (i.e. including the area proposed for your containment solution)

3. Provide Information Specified in application Form – Part C3

- a) Question 2 – Point source emissions to air, water and land - You have identified point source emissions to sewers, effluent treatment plants or other transfers off site as
- W1 – Filtrate from the GBTs
 - W2 – Centrate from the centrifuges
 - W3 – Condensate from the CHP engine and biogas lines

- W4 – Surface water drainage, and
- T1 – Discharge point for liquors into UWWT flow – downstream of penstock

Provide the National grid references for each emission point identified above.

- b) Question 3a – Technical standards – You must provide information on the measures you will use to control emissions from your process and demonstrate how you will meet the relevant BAT conclusions, BREF or technical guidance. You have identified emission points A10 – A21 secondary digester tanks air vents, and in your Duly Making Response September 2022 advised that you will implement either “Sealed with over and under-pressure protection provided; and/or, Vented to an appropriate treatment unit (odour control unit or biogas pipework)” solutions subject to sampling which is expected to take one month. You have not provided timescales for the completion of the sampling, identification of the solution or implementation of the solution. You have stated that this is “to be agreed with the EA prior to issue of the permit”. You must demonstrate that the risk posed by the diffuse emissions from vents will be controlled by suitable techniques, which are identified in BAT 14d.

Provide a BAT assessment of your secondary digester plant to demonstrate how you will meet BAT requirements (in particular BATc 14) for the secondary digester tanks including emission point A10-A21. This must include timescales for the assessment of emissions and the development and implementation of solutions. Please note that we would expect final solutions for the containment of emissions to be provided as part of the determination of this permit.

- c) Question 4a – Monitoring. This requires that you provide environmental monitoring, for example, bio-aerosol monitoring, surface water or groundwater, noise, ambient air monitoring, process and land monitoring. You must describe the frequency of any monitoring, the measurement methodology you will use and the procedure for evaluating your results. You must provide a permanent means of access to monitoring points. On assessment of your response you have provided some emission to air points in section 4.6, but not included all potential emissions, or relevant parameters. For all relevant emissions as outlined in guidance Part C3 varying a bespoke installation permit (publishing.service.gov.uk), provide:
- The national grid reference of the monitoring point
 - The frequency of monitoring.
 - The methodology used for monitoring. You should use recognized standards such as British EN standards or ISO standards.
 - The procedures (written documents) you follow to assess the measures.

4. Provide Information Specified in application Form – Part C3

- a) Question 6b – Treatments carried out on your effluent. - On assessment of the treatments you have proposed these are for the WwTW which does not form part of your permit boundary. Provide an updated C6 form which includes only treatment carried out within your permit boundary.
- b) Question 7e – Specific Substances – You have stated in your response that emission to sewer “are all routed into the wastewater treatment works’ flow to full biological treatment via the site drainage system. This is a circular process and is considered to represent BAT.” Your waste water treatment works does not form part of your permit boundary and cannot be considered as a treatment option, and the use of this as treatment does not demonstrate BAT. Effluent discharged to the head of the works is a point source emission to sewer. BAT conclusion 3 requires operators to have an emissions inventory for the effluent. We acknowledge that applicants may not hold this information in order to inform a quantitative risk assessment for existing discharges. For the purpose of duly making, provide the following information:

- i. Provide evidence in the form of sampling data to demonstrate that the effluent does not contain specific substances, or alternatively;
 - ii. Provide a summary of the sampling and analysis methodology of the effluent discharged and specify the likely pollutants in the effluent (guidance here [Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK \(www.gov.uk\)](#) and [Surface water pollution risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#)).
 - iii. Provide a written statement with a commitment to undertake full characterisation sampling and analysis in line with BAT3.
 - iv. Provide a written statement with a commitment that those undertaking the sampling and analysis will be by accredited to [MCERTs](#) or provide evidence of equivalent standards.
 - v. Provide an updated drainage plan which identifies effluent sampling point/s and emission point/s for the effluent discharge from the installation.
- c) Question 10 – Where will the effluent discharge to - On assessment of your response you have provided information for permit/consent (017030100) this permit does not form part of your boundary. Provided an updated C6 form which identifies where effluent will be discharged to for the activities you are applying for.

Please send the information, quoting the above application reference, to:
Email address: sarah.raymond@environment-agency.gov.uk

Please send the information within 10 working days of this letter.

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

If we do receive the requested information 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 07557 139052 or email sarah.raymond@environment-agency.gov.uk.

Yours sincerely

Sarah Raymond
Permitting Officer - Installations