

Old Whittington STF

Unfortunately the application payment of £16,471 you sent is incorrect. The correct application charge (subject to activity confirmation) is outlined below.

This leaves a balance to pay which will need to be agreed with the agency.

Application fee

- £13,984 application fee for - S5.4 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.
- £3,965 at 50% - (1.16.12) - Temporary storage of cake (subject to confirmation and information provided in relation to this activity below)
- £793 @ 10% - (1.16.12) – Dewatering of cake (what will not undergo anaerobic digestion, note this is based on a waste activity and not an installation activity.)
- £2,379 (1.16 14) - Physical Chemical treatment of waste - Minor variation to remove existing Phyto conditioning activities but not the land

Additional Assessments (see below for further details)

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

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 identified in the questions below.

Feed	YW comment
<ul style="list-style-type: none">• £13,984 application fee for - S5.4 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.	Raised as part of original payment.
<ul style="list-style-type: none">• £3,965 at 50% - (1.16.12) - Temporary storage of cake (subject to confirmation and information provided in relation to this activity below)	This activity will not be required, no further payment raised.
<ul style="list-style-type: none">• £793 @ 10% - (1.16.12) – Dewatering of cake (what will not undergo anaerobic digestion, note this is based on a waste activity and not an installation activity.)	This activity will not be required, no further payment raised.
<ul style="list-style-type: none">• £2,379 (1.16 14) - Physical Chemical treatment of waste - Minor variation to remove existing Phyto conditioning activities but not the land	This payment has been raised and is currently going through our approvals system. It has been given reference PSCYORKSWI024.
<ul style="list-style-type: none">• Odour management plan – a fixed charge of £1,246	Raised as part of original payment.

• Habitats assessment – a fixed charge of £779	This payment has been raised and is currently going through our approvals system. It has been given reference PSCYORKSWI024
• Emission Management Plan – a fixed charge of £1,241	Raised as part of original payment.

I've asked that this payment be raised with the following reference PSCYorkswi024 and to give your details (Sarah Raymond/Liz Topping) on the payment detail.

1) Form C2.5

We cannot locate form C2.5 and you have applied to add medium combustion plant to your site.

Guidance on how to complete this form can be found here.

(<https://www.gov.uk/government/publications/application-for-an-environmental-permit-partc25-vary-to-add-a-new-mcpsg-or-change-an-existing-mcp-or-sg-permit>) Provide a completed C2.5 form.

When we originally submitted the IED applications we took advice from Phil Dixon who advised that an appendix labelled C2.5 would be sufficient to provide details on MCP. As a result, we did not submit Form C2.5 for any IED sites that had existing MCP.

For the sake of clarity, we have completed Q1 part_C2.5 Fin, see attached.

2) Form C2

On review of form C2, you have not provided the following information. You must ensure that all relevant sections are completed. Provide an updated C2 form that includes the following completed answers for questions 1b, 2b, 2c, 2d, 5b,5d,5e, and 5f.

See attached 2 - Form Part C2_Old Whittington_v2

3) Form C3

On review of form C2, you have not provided the following information. You must ensure that all relevant sections are completed.

Provide an updated C2 form that includes the following completed answers for questions 4b.

See attached 3 - Form Part C3_Old Whittington_v2

4) Temporary storage of cake

You have identified within your application that "greater volumes may be stored on site in emergency/abnormal conditions such as following processing problems at other YW sites.", and provided table 'C3: 1b-2 – Types of waste accepted – Imported wastes for dewatering/storage only (prior to recovery)'.

If you are importing cake for temporary storage and transfer of site without wastes being processed through the AD this will be a separate waste activity. In order to progress this activity you will need to provide the information identified within our application process, this includes but is not limited to

the below. (Please note it is your responsibility to ensure that information is provided in line with our requirements, failure to provide this will mean that we will not be able to progress these elements of your application)

a) Payment in line with guidance ‘When and how you are charged’ and above summary.

At this current point in time we will not be progressing the discussion for a waste transfer station for dewatering / storage only of cake.

b) Non-technical summary, and process flow including how you will keep this activity separate from your installations activity (<https://www.gov.uk/guidance/waste-environmental-permits>)

N/A

c) Assessment against Non-hazardous and inert waste: appropriate measures for permitted facilities <https://www.gov.uk/guidance/non-hazardous-and-inertwaste-appropriate-measures-for-permitted-facilities>

N/A

d) Completion of relevant forms – B4 new bespoke waste operation - <https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b4-new-bespoke-waste-operation>

N/A

e) Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan ect.

N/A

5) Dewatering of cake that will not undergo AD

You have identified within your application table ‘C3: 1b-2 – Types of waste accepted – Imported wastes for dewatering/storage only (prior to recovery)’. If you are importing waste for dewatering only and transfer of site without wastes being processed through the AD this will be a separate waste or installation activity (depending on the tonnage and process). In order to progress this activity as a waste activity you will need to provide the information identified within our application process, this includes but is not limited to the below. (Please note it is your responsibility to ensure that information is provided in line with our requirements, failure to provide this will mean that we will not be able to progress these elements of your application)

e) Payment in line with guidance ‘When and how you are charged’ and above summary.

At this current point in time we will not be progressing the discussion for a waste transfer station for dewatering cake that will not undergo AD.

f) Non-technical summary, and process flow including how you will keep this activity separate from your installations activity (<https://www.gov.uk/guidance/waste-environmental-permits>)

N/A

- g) **Assessment against Non-hazardous and inert waste: appropriate measures for permitted facilities**
<https://www.gov.uk/guidance/non-hazardous-and-inertwaste-appropriate-measures-for-permitted-facilities>

N/A

- h) **Completion of relevant forms – B4 new bespoke waste operation -**
<https://www.gov.uk/government/publications/application-for-an-environmentalpermit-part-b4-new-bespoke-waste-operation>

N/A

- i) **Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan etc.**

N/A

6) Surrender of existing permitted activities

You have requested the surrender of your existing permitted activities but not the associated land, however you have not provided payment, or any information on how these activities have been decommissioned and if the environmental risk removed. In order for us to progress this you will need to provide the following.

- a) **A non-technical summary and evidence to demonstrate that all risks have been removed from the activities being surrendered**

When we submitted the original application on 1 January 2022 we applied for a new application. Upon reflection, and after been given the opportunity to resubmit in December 2023, we decided to vary the existing sludge phyto conditioning permit. We're not surrendering the activities but varying them to better reflect the activities that are now undertaken on site. There is no legacy material in place from the permit that is being varied.

- b) **Pay the fee in line with section 5.1 of guidance**
<https://www.gov.uk/government/publications/environmental-permittingcharges-guidance/environmental-permitting-charges-guidance#surrender-apermit>.

As discussed in Q1, an additional fee of £2,379 has been raised in line with 1.16 14 - Physical Chemical treatment of waste - Minor variation to remove existing Phyto conditioning activities.

7) Bioaerosol Risk assessment

You have stated that you have carried out “quantitative bioaerosol monitoring in accordance with Technical Guidance Note M9 ‘Environmental Monitoring of Bioaerosols at Regulated Facilities’” and determined that “.On this basis, further bioaerosol monitoring at Old Whittington is not deemed necessary as adequate control measures are already in place to minimise the release of bioaerosols

as a result of permitted activities". You need to send us a Bio-aerosol Risk Assessment that is specific to your site. This should meet the requirements of our M9 Position Statement (<https://www.gov.uk/government/publications/bioaerosol-monitoring-at-regulated-facilities-use-of-m9-rps-209/bioaerosol-monitoring-at-regulated-facilities-use-of-m9-rps-209>) and be specific to the facility you are applying to permit. This must show that the process and/or abatement measures adequately prevent, or where this is not possible, significantly reduce the risk of bio-aerosols release. It must show that the resulting activity will be unlikely to expose the nearest sensitive receptor to elevated concentrations of bio-aerosols.

The detail and level of risk assessment must be site specific, process, and location dependent. You must have measures and process controls in place to control and minimise the risks identified. These must be clearly stated in your assessment.

Provide a Bioaerosol Risk assessment in line with M9 guidance.

Bioaerosol monitoring is one of the areas that we have changed position on since we originally submitted the Application and resubmission. Whilst YW maintain that the open sources are a low bioaerosol risk, YW does accept that bioaerosol monitoring will become a quarterly (dropping to 6monthly) part of the permit unless otherwise agreed in writing with the EA.

Please see the attached 7 - Old Whittington STF Bioaerosol Site Specific Risk Assessment V001

8) Accident Management Plan

You have submitted a risk assessment under section 6.8 of your submission in relation to accidents, however this does not meet the requirement set out in our guidance <https://www.gov.uk/guidance/develop-a-management-system-environmentalpermits#accident-prevention-and-management-plan>.

Provide a standalone accident management plan that meets the requirements of the above guidance.

Please refer to 8. Accident Management Plan_Old Whittington_v1

9) Emission Points

On review of your 'Principle Emission Points Rev.B' this does not include the location of your pressure release valves (PRV). Update plan 'Principle Emission Points Rev.B' to include the location of the PRVs and provide the National Grid references for each PRV.

This is the first time we have received this request to add PRVs onto the emission point plan. Recent conversations with Jemma Blood-Halverson for Aldwarke discussed there being a requirement to have only abated air emission sources on the emission point plan (request in relation to removing the unabated vent stacks from the emission point plan).

Whilst the PRV locations can be easily provided, YW wish to point out that this request is an inconsistency with other applications and is not in keeping with these being emergency release only.

10) Secondary Containment

Document 'Old Whittington Secondary Containment Assessment' does not include spill modelling following the implementation of the proposed high level solution. Confirm that as part of any final

detailed design, spill modelling will be undertaken to demonstrate that the proposed solution will contain spills in line with CIRIA C736.

Please refer to 10 - Old Whittington - Secondary Containment Report_V003 which includes additions to section 7 and appendix 6.

11) Waste water emissions during storm overflow conditions at the WwTW.

Routine emissions to the WwTW from the installation will be controlled via monitored emission limits as an indirect discharge (as defined in the Waste Treatment BREF). However, as WwTW periodically discharge sewage during storm conditions, it's possible that waste water from the installation could bypass the WwTW treatment processes and be emitted as a direct discharge to water. Its not clear from the application how this abnormal situation will be prevented. Operators of environmental permits cannot emit waste waters directly to surface waters without detailed risk assessment. You must therefore have procedures to prevent the discharge of waste water from the installation from bypassing the WwTW treatment processes directly to surface water during storm overflow conditions.

- a) Provide written procedures which describes the site's contingency arrangements to prevent digestate and effluent being discharged off site while the WwTW are in storm conditions.**

The return liquor lines from the STF all return to the STW inlet downstream of the storm screen overflow. It's at a location where the incoming flow has already been lifted by the FFT screws and therefore STF returns can't get back to the storm overflow point. There is no ability that any STF returns will be discharged from the STW without treatment through the STW.

- b) Provide a description of the buffer storage proposals to control or hold emissions to the event of storm overflow conditions at the WwTW.**

As there is no ability for STF return liquors to discharge via the storm overflow channels, there is no requirement for buffer storage.

- c) Should any contingency arrangements use storage tanks to act as a buffer, provide evidence that demonstrates the waste waters or digestates can be held in this storage during the period of storm overflows. Note, this information can be included as an addendum to your accident management plans as part of BAT conclusion 21, Emissions from accidents and incidents.**

N/A

12) Emissions to air from odour control units

Under BREF guidance BAT conclusion 8, BAT is to monitor channelled emission to air at agreed frequencies and standards. On review of your submission we can see no mention of parameters for the 'Treatment of water-based liquid waste' (TVOC and HCl), or evidence that TVOC and HCl have not been identified as relevant in the waste gas stream. Your activity includes prior to the AD process (the biological treatment of waste) the thickening and dewatering process which is a directly associated activity of the AD process. The odour control units identified serve this directly associated activity. The BAT AELs are appropriate for the activity defined under the BREF as 'Treatment of water-based liquid waste'. The BREF provides examples of wastes that would be considered as water-based

liquid wastes. These include wastes under the category '19 08 wastes from waste water treatment plants not otherwise specified'. The treatment of this waste in the dewatering and thickening stage and the subsequent emissions to air from connected abatement could be subject to the BAT AELs specified within BAT conclusion 8.

a) Confirm that you will characterise emissions from the odour control units in line with BAT 3 to demonstrate if TVOC and HCl are present in the waste gas stream.

Monitoring will be carried out in line with BAT requirements.

b) Confirm that if TVOC and HCl are identified as relevant in the waste gas streams that you will monitor these emission in line with BAT requirements.

Monitoring will be carried out in line with BAT requirements if identified as part of the waste gas inventory in BAT 3.

13) ISO Certificate

On review of your ISO 14001 certificate this has expired. Provide an updated ISO 14001 certificate

Please see attached 13 - ISO14001 certificate

14) Waste acceptance and pre-acceptance

We cannot locate your waste acceptance and pre-acceptance procedure within your submission that meets the requirements of BAT 2. Provide a waste pre-acceptance and acceptance procedure for imported and indigenous sludge. Guidance on what this should include can be located at <https://www.gov.uk/guidance/biological-waste-treatment-appropriate-measures-forpermitted-facilities>.

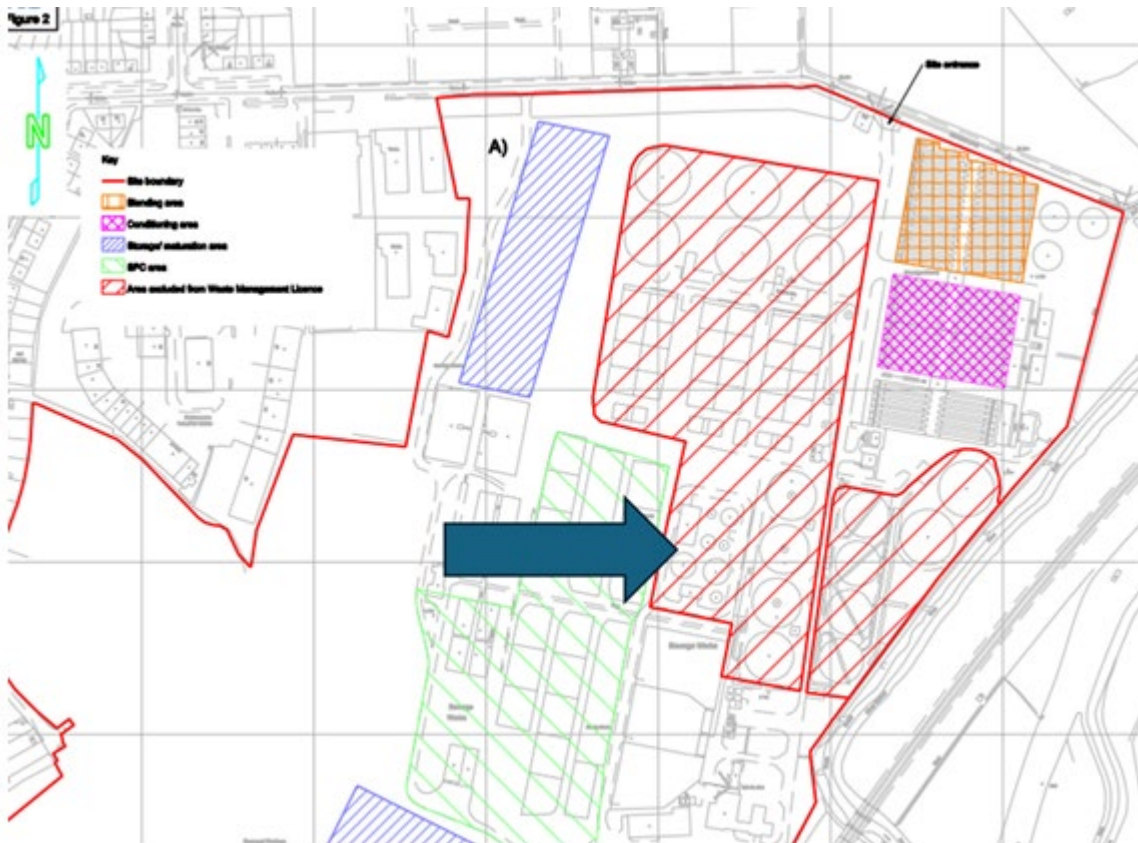
This originally went in as appendix 13 in the resubmission that was sent on 20/12/23 from Emma Stewart of Aqua Consultants. I believe you were experiencing IT issues at this time so it was resent to you on 4/01/2024 at 13:05. The link within that resubmission will have long since expired but if you need the resubmission sending to you again please do let us know.

15) Site Condition report You have provided a site condition report in line with H5 guidance, however we cannot identify where extra land has been included within your permit boundary. As such we do not believe that this is required and would not look to assess this as part of your application.

Confirm that you are not including extra land within your existing permit boundary.

Form C2 has been amended (Q5b). Extra land is required in the existing permit boundary and therefore the SCR is required.

It's YW's understanding that the conditioning permit, which is being varied through this IED application process, included an area of etched out land that was the STW. Some of this STW land has now become the STF. This is roughly at the location given on this figure.



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

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-scheme2019> If you have any questions please phone me on or email. Yours sincerely Senior Permitting Officer - Installations