

Reference: EPR/YP3392ZB/V004

Lundwood Sludge Treatment Facility, Lund Lane, Barnsley, S71 5PA

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 Environment 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.

Payment	Description	Comment
£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.	OK. Raised Previously (~December 2021)
£3,965 at 50% - (1.16.12)	Temporary storage of cake (subject to confirmation and information provided in relation to this activity below)	At this stage, and as part of the IED application, we will not be pursuing the waste transfer station. This payment has therefore not been raised.
£793 @ 10% - (1.16.12)	Dewatering of cake (what will not undergo anaerobic digestion, note this is based on	At this stage, and as part of the IED application, we will not be pursuing the waste transfer

	a waste activity and not an installation activity.)	station. This payment has therefore not been raised.
£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)	This has been raised and is currently going through approvals.
a fixed charge of £1,246	Odour management plan	Raised Previously (~December 2021)
a fixed charge of £779	Habitats assessment	This has been raised and is currently going through approvals.
a fixed charge of £1,241	Emission Management Plan	Raised Previously (~December 2021)

I've raised the additional charges as follows, this is currently going through our approvals system and will be affected by annual leave. Please accept the following screenshot that this payment is in the process of being approved and then paid. I've used YW reference PSCYORKSWI026.

The screenshot shows the SAP Ariba Buying interface. At the top, there is a search bar with the text 'Find goods and services' and a search icon. Below the search bar, there are navigation tabs: 'Your requests', 'Recent requests', 'Requisitions', 'Purchase orders', 'To receive', 'Request for quotes', and 'Custom forms'. The 'Recent requests' tab is selected. Below the tabs, there is a section titled 'Recently updated within 3 months'. Under this section, there is a list of requisitions. One requisition is visible: 'Lundwood Additional IED Costs' with ID 'PR288167' and a date requested of '19 August 2024'. The status of this requisition is 'SUBMITTED'. The last updated time is '0 days ago'. The amount is '£3,158.00 GBP'. There is a 'View all' link to the right of the requisition list.

1) 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, 5e, and 5f.

Please see Form Part C2_Lundwood_v2

2) Form C3

On review of form C3, you have not provided the following information. You must ensure that all relevant sections are completed. Provide an updated C3 form that includes the following completed answers for questions 4b.

Form Part C3_Lundwood_v2

3) 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.

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>)

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>

d) 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>

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

At this stage, and as part of the IED application, we will not be pursuing the waste transfer station. This payment has not been raised. The OMP has been updated to state the cake pad is for digested cake storage only. Reference to undigested sludge has been removed from table 11 of the OMP.

4) 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)

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

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>)

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>

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

At this stage, and as part of the IED application, we will not be pursuing the waste transfer station. This payment has not been raised. The OMP has been updated to state the cake pad is for digested cake storage only. Reference to undigested sludge has been removed from table 11 of the OMP.

5) 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 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>.

When we submitted the original application on 1 January 2022 we applied for a new application. Upon reflection, and given the opportunity to resubmit in December 2023, we decided to vary the existing sludge phyto conditioning permit (YP3392ZB). 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.

6) 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 "Lundwood STF installation is not a significant source of bioaerosols and no further investigation or monitoring is proposed". You need to send us a Bioaerosol Risk Assessment that is specific to your site. This should meet the requirements of our M9 Position Statement (<https://www.gov.uk/government/publications/bioaerosolmonitoring-at-regulated-facilities-use-of-m9-rps-209/bioaerosol-monitoring-at-regulatedfacilities-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 bioaerosols 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.

Please see 6 - YP3392ZB Lundwood STF Bioaerosol Site Specific Risk Assessment V001

7) Accident Management Plan

You have submitted a risk assessment under section Q 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 see 7 Lundwood STF Accident Management Plan.

8) 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.

Please see Lundwood Figure 3 Principal Emissions Points_RevC

At grid reference...

438084, 407020

438086, 407018

9) Secondary Containment

Document 'Lundwood 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 see 9 - YW Lundwood - Secondary Containment Report_V002

10) 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 wastewater from the installation could bypass the WwTW treatment processes and be emitted as a direct discharge to water. It's not clear from the application how this abnormal situation will be prevented. Operators of environmental permits cannot emit wastewaters directly to surface waters without detailed risk assessment. You must therefore have procedures to prevent the discharge of wastewater 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.

No contingency arrangement is needed for the return of STF liquors whether the STW is in storm conditions or not. All STF return liquors return downstream of the storm overflow and downstream of the flow meter. There is no ability for STF returns to flow directly to watercourse when the site is experiencing flows in excess of FFT or otherwise.

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

There are no buffer storage tanks proposed for the storage of STF return liquors.

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

11) 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.

Emissions from the OCU will be characterised in line with BAT 3.

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.

If relevant in the waste gas stream, TVOC and HCl emissions will be monitored in line with BAT 3.

12) ISO Certificate

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

Please see attached ISO14001 certificate, expiry 2027.

Please send the information, quoting the above application reference, to liz.topping@environment-agency.gov.uk.