

20 March 2019

Environment Agency Permitting and Support Centre
Environmental Permitting Team
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Application Reference: EPR/XP3493VP/V006

Permit Variation Application for a proposed treatment plant at the existing Clinical Waste Facility at Stoke

Dear Pete,

Thank you for your email dated 5 March 2019, which set out additional information that you require in order to Duly Make the application referred to above. The contents of this response are as follows.

Application Form

You requested that application form Part C4 is also submitted, to reflect the proposed shredding of offensive waste which is a waste operation but is not a DAA to the main treatment activity.

A copy of the completed form Part C4 is attached as Annex NDM1 of this letter. The inclusion of this incurs a cost for the waste operation. The application is a normal variation – the fee for this in relation to the physical treatment of non-hazardous waste is in Table 1.16 of the EA Charging Scheme, under 1.16.12, which is £3,965.

Sharpsmart will make payment of this amount, to the EA via BACS. The following reference has been used: PSCAPPSHARP456.

Shredding of Offensive Waste

You have requested confirmation of the treatment pathway for the offensive waste stream.

To clarify, the process flow diagram in Appendix B is correct. Whilst the primary treatment is of the hazardous clinical waste stream, through all 3 parts of the process (shredding, autoclave, compaction), the applicant would also like the ability to accept non-hazardous, offensive, waste into the shredder.

Measures are proposed (and outlined in the BAT assessment submitted) to ensure that the shredder is disinfected fully prior to using it for this waste stream (to prevent any cross contamination from preceding hazardous waste loads); this means that the shredded offensive waste is in a state that it can be used as RDF at the designated recovery facility. The RDF from the clinical waste treatment process is compacted and sent as RDF to the designated recovery facility, and the latter has confirmed that it can accept both non-hazardous waste streams as RDF. The use of the compactor for both waste streams is therefore considered to be appropriate, practical, and efficient in terms of onward transfer.

Odour Management Plan

You have requested an Odour Management Plan (OMP).

An OMP has been produced for the proposed treatment facility (ref. SHSMT_2018.01/08). This forms Appendix K to the variation application and is provided in Annex NDM2 of this letter. It has been written in accordance with the EA Horizontal Guidance Note H4, dated March 2011.

The inclusion of this incurs a cost which is set out in Table 1.19 of the EA Charging Scheme, and is £1,246. SharpSmart will make payment of this amount, to the EA via BACS, under the same reference as the waste operation referred to above.

Qualitative Risk Assessment

You have requested augmentation of the existing risk assessment (Appendix H of the variation application), to include assessment of ecological receptors.

A magic search was carried out for the purposes of the application and no statutory ecological sites were identified. We have however noted that there are some that for some reason did not show up on the magic search. Whilst there are no local or statutory ecological designations on or in the immediate vicinity of the Site, there are a number in the wider locale and these have been identified as follows:

- Ford Green Reedbed Site of Special Scientific Interest (SSSI) which is at 3.1 km northeast;
- Metallic Tileries, Park House SSSI which is at 1.8 km northeast;
- Westport Lake Local Nature Reserve (LNR) which is 415 m northwest;
- Whitfield Valley LNR which is at 2.9 km northeast; and
- Bradwell Woods LNR which is at 1.9 km to the northwest.

The ERA has been updated to reflect this. A copy of v2 of the ERA is provided in Annex NDM3 of this letter.

H1 Risk Assessment

You have requested a quantitative assessment of the emissions from the proposed point sources.

Our correspondence following your request has confirmed that whilst we are unable to assess the actual emissions from the proposed plant (as it is not yet installed or indeed operational), we can present an H1 using permit limits that will be applied to the emission points to air. We have completed an H1 but would like to make it clear that this is hugely conservative and presents a worst case scenario. We would propose that the H1 could be revisited within the first 12 months of operation of the plant, to run real emissions monitoring data through it, representing the actual impact from the activity; this could be included as an improvement condition in the varied permit. The boiler exhaust (A1) has been assessed for NOx; the two LEVs (A2 and A3) have been assessed for ammonia, NOx, PM10, PM2.5, and benzene. Odour is not assessed in H1 screening; instead we would direct you to the odour management plan referred to above.

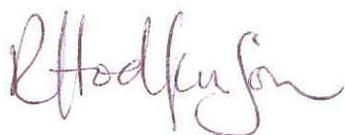
We also note that the H1 has only assessed emission points to air, not the emission point to sewer. This is because, in accordance with EA guidance, a variation application only needs to assess the impact of the proposed changes and there is no new emission point to sewer as a result of the application, nor is the existing discharge consent affected by the proposals.

The H1 forms Appendix L to the variation application and is provided in Annex NDM4 of this letter.

Close Out

We hope that this response addresses your queries and enables you to Duly Make the application; we look forward to hearing from you soon regarding the determination of the application.

Yours sincerely



Rebecca Hodkinson
Reva Environmental Limited