

## **About this consultation**

# TA5 1UD, NNB Generation Company (HPC) Limited: environmental permit consultation

The aim of this consultation is to ask whether you have any comments relevant to the permit application

We want to make the best decision when permitting. Listening to the views of others helps us to take account of concerns, or local environmental factors, that we may not be otherwise aware of.

We are seeking comments on the application for NNB Generation Company (HPC) Limited. Please use the reference number below when making comments on this application.

- Permit Number: EPR/JP3122GM/V012
- Regulated facility type: Water management zones and effluent treatment units serving the Hinkley Point C (HPC) construction site
- Regulated facility location: Hinkley Point C Construction Site, Hinkley Point C power station, Wick Moor Drove, Near Bridgwater, Somerset, TA5 1UD

Additional details provided to aid your review of the application and supporting information documents

For information, we have included details below to aid the review of the applicant's 249 page main support document (document reference: 101231911), and can be used to locate relevant sections which may be of interest to the reader/reviewer. It also provides an indication of each section's length by specifying the number of pages within each section of the HPC main variation application support document (this may help indicate how much time resource will be required to review each section of the document if it is of interest to you).

### Quick breakdown of HPC's main permit variation supporting information report (HPC ref: 101231911)

Listed on the Citizen Space consultation for this consultation as document:

• 3. 15-04-2024 - HPC main application report and appendices - 101231911\_001\_CWDA\_12\_technical\_report\_COMPLETE - EPR-JP3122GM-V012

The above supporting information report (101231911) is 249 pages in total and is broken down into the following sections (with page numbers provided within the PDF report):

**Document cover sheet** – Pages 1 and 2 (2 pages in total)

Non-technical summary – Pages 3 and 4 (2 pages in total)

Contents list – Pages 5 and 6 (2 pages in total)

Tables and figures list – Pages 6 and 7 (2 pages in total)

Section 1: Introduction – Pages 8 and 9 (2 pages in total)

- **1.1:** Purpose Page 8 (1 page)
- 1.2: Scope Page 8 (1 page)
- 1.3: Summary description of the proposed variation Page 8 (1 page)
- 1.4: Contents of this report Page 9 (1 page)
- 1.5: Definitions Page 9 (1 page)

**Section 2:** Proposed variation – Pages 10 to 13 (4 pages in total)

- **2.1:** Description of current operations Page 10 (1 page)
- 2.2: Effluent characterisation Page 11 (1 page)
- 2.3: Effluent development Pages 11 to 13 (3 pages)
  - o **2.3.1:** Copper Page 11 (1 page)
  - o **2.3.2:** Zinc Page 11 (1 page)
  - o **2.3.3:** Free chlorine Page 12 (1 page)
  - o **2.3.4:** Demineralised water plant chemicals Pages 12 and 13 (2 pages)
  - o **2.3.5:** Buoyancy Page 13 (1 page)

Section 3: Environmental assessment - Page 14 to 23 (9 pages in total)

- **3.1:** Methodology Pages 14 and 15 (2 pages)
- 3.2: Assessment metals and chlorine Pages 15 to 17 (3 pages)
  - o 3.2.1: Results of the H1 assessment Pages 15 to 17 (3 pages)
  - o 3.2.2: In combination effects Page 16 and 17 (2 pages)
- 3.3: Assessment Demin plant chemicals Pages 17 to 23 (6 pages)
  - o **3.3.1:** Substances without a PNEC Page 17 and 18 (2 pages)
  - o 3.3.2: Results of the H1 assessment Page 19 and 20 (2 pages)
  - o **3.3.3:** Priority hazardous substances Page 21 (1 page)
  - o 3.3.4: Justifications Pages 21 to 21 (2 pages)
- 3.4: Treatment approach Pages 22 to 23 (2 pages)

**Section 4:** Conclusions – Page 24 (1 page in total)

Section 5: References – Page 25 (1 page in total)

**Appendix A:** Permitted activities, discharges and waste streams under activity I – Pages 27 to 28 (2 pages in total)

Appendix B: Copper, Zinc and Chlorine data and calculations - Page 29 to 37 (8 pages in total)

**Appendix C:** Chemicals for use in demineralisation plant data and calculations – Page 37 to 43 (6 pages in total)

**Appendix D:** Responses to EA pre-application review comments for CWDA12 - Page 44 to 51 (7 pages in total)

**Appendix E:** Background values for contaminants in the Severn Estuary included in TR428 – Pages 52 and 53 (2 pages in total)

**Appendix F:** Technical report (TR) TR428 (revision 14) HPC construction discharge modelling assessment at the temporary jetty location – Page 54 to 165 (111 pages in total)

**Appendix G:** TR550 (revision 04) HPC combined construction and commissioning jetty discharge – Evidence to inform habitats regulations assessment (HRA) – Page 166 to 249 (83 pages in total)

The Environment Agency WDA permit variation application forms (Part A, Part F, Part C2 and Part C6) are provided within the following HPC application document (as listed on the Citizen Space page for this consultation):

 2. 15-04-2024 - HPC application forms - 101262820 - CWDA V012 application forms - EPR-JP3122GM-V012

Electronic versions of the variation application's H1 risk assessment raw data, summary statistics and data analysis have also been submitted by the applicant within the documents listed as 4 and 5 on the Citizen Space page for this consultation. These were submitted by the applicant in response to a request for information (RFI), as required to enable duly making of the permit variation application:

 4. 09-05-2024 - HPC RFI response - 101274451 001 - Potable Water Analysis for CWDA V012 - EPR-JP3122GM-V012  5. 09-05-2024 - HPC RFI response - 101274453 001 - Demineralisation Plant Chemicals Analysis for CWDA V012 - EPR-JP3122GM-V012

The information submitted within documents 4 and 5 above provides electronic versions of the supporting data provided within the following sections of the applicant's main variation application support report (ref: 101231911):

- 3.2.1: Results of the H1 assessment (metals and chlorine) Table 3
- 3.2.2: In combination effects Table 4
- 3.3.2: Results of the H1 assessment (demin plant chemicals) Table 6
- 3.3.3: Priority hazardous substances screening calculations for cadmium and mercury Table 7
- Appendix B (tables B1, B2 and B3)
- Appendix C (tables C1, C2 and C3)
- Appendix E (table E1, same as data within table 21 of TR428 rev 14)

The requirement to provide electronic versions of raw data to support a permit application (or permit variation application) is stipulated in our guidance for application form C6 (Question 8b), which states "You must carry out a specific substances screen using the H1 screening tool and send us the completed tool along with the raw data used to create the summary statistics"

• Reference to the above guidance is available on GOV.uk via the following link:

<u>Guidance notes on part C6 – Variation to a bespoke water discharge activity or groundwater activity (point source discharge)</u>, or point source emission to water from an installation (publishing.service.gov.uk)

#### What the response will be used for

We will take your consultation responses into consideration as part of our determination of the permit. If we decide to grant the permit we will explain how we made our decision and how we have addressed the concerns that were raised.

We will only issue a permit if we believe that harm to the environment, people and wildlife will be minimised and that the operator has the ability to meet the conditions of the permit. Providing a business can prove that the proposed activities meets all the legal requirements, including environmental, technological and health requirements, then we are legally obliged to issue a permit, even if some people do not approve of the decision.

#### **How to Respond**

If you would like to comment online, please use the online consultation tool in Citizen Space.

If you'd prefer to submit your response by email, contact psc-waterquality@environment-agency.gov.uk

#### How we will use your information

We will look to make comments received publicly available at our Environment Agency public register.

All comments which are made publicly available will exclude email addresses and telephone numbers. Any comments where confidentiality has been claimed will not appear on the public register.

In accordance with the Freedom of Information Act 2000, we may be required to publish your response to this consultation, but will not include any personal information. If you have requested your response to be kept confidential, we may still be required to provide a summary of it.

#### **Consultation Principles**

We are running this consultation in accordance with the criteria set out in the government's Consultation Principles.

If you have any queries or complaints about the way this consultation has been carried out, please email: <a href="mailto:psc-waterquality@environment-agency.gov.uk">psc-waterquality@environment-agency.gov.uk</a>