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Habiba Daniyan
Environmental Agency, National Permitting Service
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8 City Walk,
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Date: 30th May 2025

Our Ref: SOL_24_P101_N+P

Dear Habiba,

RE: N&P HARTLEPOOL MRF LTD – EPR/GP3399LG/V009

Further to your email dated 15th May 2025, please find below a response to each of your questions in turn.

In addition to this we would like to include some further information on the Hammer Mill abatement system. The Hammer Mill is equipped with a cyclone filter which has been designed to meet BAT. The cyclone filter provides an appropriate abatement system for treatment prior to release within the building. Dust within the air is separated by a cyclone effect on the outside of the filter hoses, which are pushed over the filter baskets. The cleaned air then passes through the pores of the hose to the clean air chamber. The clean air then leaves the filter through the air outlet opening and discharges into the building. Due to discharging into the building, this would not be considered a point source emission. Please refer to Annex 1 of this letter for more information on the abatement system.

In addition to this, the area where the pulverised material is stored is within a partially enclosed bunker to allow vehicle movements whilst also ensuring any dust emissions are contained. A photo of this bunker is provided within Annex 2 of this letter.

1. *Provide payment of the additional £10,423 and forward on any remittance information/advice that may help us trace the payment through our internal systems.*

The additional payment has been made to the Environment Agency on 23rd May 2025 using payment reference: **PSCAPPHARTL001.**

Please find proof of payment within Annex 3 of this letter.

2. Provide an **Appropriate Measures Assessment** document that addresses the following aspects:

- Assessment against all appropriate measures sections that are relevant to the activity A6 waste operation variation and the new activity for the Hammermill operation.
- Details of any alternative measures proposed that deviate from those set out in the appropriate measures guidance (such as an alternative measure to negative pressure dust extraction).

An assessment has been carried out against the appropriate measures guidance. Please refer to Annex 4 of this letter for more information.

3. **Alternative Measures Justification** - Provide detailed evidence based justification for alternative measures proposed that deviate from those specified in appropriate measures guidance ensuring that they provide an equivalent level of environmental protection to those measures specified in the appropriate measures guidance.

An assessment has been carried out against the appropriate measures guidance. Please refer to Annex 4 of this letter for more information.

4. **Emission Point Plan** - Provide an emission point plan that includes the following:

- Any new emission point associated with the variation (such as dust extraction emission point if you are not exploring alternative measures).
- The existing S1 emission point to water/sewer
- The permitted boundary outlined in green

An emission point plan is included within Annex 5 of this letter.

The dust extraction system discharges into the building and therefore is not considered a point source emission.

5. **BAT Assessment** - Provide a BAT assessment that addresses all the BAT point relevant to the new section 5.4 activity (Hammermill operation).

A review of the Hammer Mill operation has been undertaken against the relevant sections of the Waste Treatment BREF.

Please refer to Annex 6 of this letter for more information.

6. **Technical Competence** - Provide evidence of technical competence for the onsite technically competent manager (TCM) – in this case Darren Jones – as follows:

- The original Wamitab Certificate for the TCM.

As discussed, Darren Jones replacement original WAMITAB certificate has been ordered and will be forwarded to the EA as soon as it is received. In the meantime, Adil Braqi also holds the necessary qualifications. His original certificate is provided within Annex 7 of this letter.

7. **Site Layout Plan** - Provide revised site layout plans that includes the following:

- The location of the new Hammermill plant and associated equipment within the black sand shed.
- The location of the additional storage area for the SRF bales and pellets.
- Inclusion within the FPP demonstrating combustible storage distance and footprints.

As agreed, the site layout plans will be submitted to the EA by Monday 9th June.

8. **Process Flow Plan** - Provide a process flow diagram that illustrates the step-by-step waste storage and treatment on site that include the following aspects:

- Waste inputs and output (e.g. reception areas, effluents, etc)
- Treatment plant and equipment
- Storage stockpiles

Please refer to the process flow plans provided within Annex 8 of this letter.

9. **Environmental Management System (EMS)** - Provide a summary of the EMS.

N+P have an existing Environmental Management System that is certified to ISO 14001:2015.

The N+P EMS consists of the following procedures and documentation:

N+P Overarching Procedures:

- Auditing & Assurance Procedure;
- Duty of Care Waste Transfer Notes Procedure;
- F Gas - Fluorinated Gas and Ozone Depleting Substances Procedure;
- Fire Safety Procedure;
- Incident Reporting Procedure (Health, Safety & Environment);
- N+P Management System Manual;
- Non-conformance and Complaints Procedure;
- Oil Storage Requirements Procedure;
- Unit Emergency Plans (UEP's) Procedure;
- Waste Acceptance & Assessment Procedure; and
- Environmental Legal Register.

Toolbox Talks:

- Toolbox Talk - Spill Control; and
- Toolbox Talk - Waste Duty of Care.

Hartlepool Site Specific Documents:

- Risk Register;
- Environmental Aspects Register;
- Site Working Plan;
- Mud Management Plan;
- Odour Management Plan;
- Fire Prevention Plan;
- Pest Management Plan;
- Litter Management Plan; and
- Waste Sampling Plan.

Site Emergency Plans:

- Hartlepool MRF Emergency Response Actions;
- Hartlepool MRF UEP Introduction;
- EP001 – Litter;
- EP002 – Non-conforming Waste;
- EP003 – Dust;
- EP004 – Odour;
- EP005 – Contamination of Ground Surface Water;
- EP006 – Flood;
- EP007 – Vermin;
- EP201 – Suspected Bombs, Explosives, Incendiary Devices;
- EP202 – Fire Explosion Fuel Oil Storage Facilities;
- EP204 – Fire in Administrative Activities;
- EP205 – Material Fire;
- EP206 – Vehicle Load Fires;
- EP208 – Diesel Storage Facilities;
- EP209 – Material & Processing Plant in Yard;
- EP301 – Leaks, Spillages & Escapes on Site;
- EP303 – Leaks Spillages & Escapes - Ground Surface Water.

Should you have any further questions in relation to the above please do not hesitate to contact me.

Yours sincerely,



Sophie Rainey

