

From: Elizabeth Lyon, Environmental Consents, SCS Railways (SCSJV)

To: Jonty Bates, Installations Permitting, Environment Agency

Date: 27th October 2023

Covering Letter – Application for an Installation Permit – Transfer and Treatment Facility (Cophall South) (STA) – permit reference EPR/GB3301GY

Dear Jonty

This covering letter accompanies a submission of documents relating to the application for an installation permit for SCSJV waste treatment facility (STA) at Cophall South (Ickenham). The purpose of this letter is to provide clarity and context for the application submission. A table listing the documents submitted for the installation permit application is at the end of this letter.

Background to current permit and installation variation

The current bespoke waste permit for the STA facility was issued on 15/06/2023. The application to vary to an installation was first submitted on 16/06/2023, comprising a non-technical summary and application forms (Parts A, C2, C3, F1). Acknowledging that a Best Available Techniques Assessment is required and would be submitted once completed.

The reason for the variation is that it came to our attention very late in the day that the bespoke waste permit applied for (and received in draft June 2023) would limit the treatment for disposal volume to 50 tonnes per day. The capacity of the lime pugmills (this term refers to soil stabilization system by addition of lime for reduction of soil moisture content and improve workability) is significantly higher (approximately 6,800 tonnes / 24 hours).

Technical documents

There are 2No. key documents included in the submission that require assessment for the installation permit.

- Best Available Techniques (BAT) Assessment (new); and
- Management Systems and Procedures Document (containing Environmental Risk Assessment (updated)).

We have supplied for reference only copies of other relevant documents associated with the current permit, including:

- Dust and Emissions Management Plan (DEMP);
- Noise and Vibration Management Plan (NVMP);
- Site Operating Plan (SOP); and
- Site Condition Report.

These documents have not been amended since assessed and approved for the current permit (June 2023). The DEMP, NVMP and SOP are Operating Techniques within the current permit. These were written and approved on the basis of the facility being fully operational and running 24/7. We propose they are fit for purpose for the installation and do not require reassessment.

This of course is at your discretion. For reference the DEMP was assessed by your colleague Elisabeth Platts and the NVMP by Rory Peliza of the Environment Agency.

We have paid an assessment fee for the DEMP and the NVMP, which we would expect to be refunded in due course if not utilised. The email exchange between ourselves dated 24/10/2023 confirms the breakdown of fees for this application made to date.

Pre-application meetings

We have held 2.No pre-application meetings with your colleagues – Katie Baker, Matthew Wales and Francis Nwafor.

11/08/2023 – in this meeting it was confirmed that we would update the Environmental Risk Assessment, (and therefore the Management Systems and Procedures document in which it is contained) to support the BAT Assessment.

09/10/2023 – Rita McCormack and Amber Parnell (Environment Agency) also attended this meeting, with regard to the surface water discharge from the facility. In this meeting it was also recommended (Francis Nwafor) that we would complete Form B6 – new water discharge activity from an installation. This form has been included in the submission pack.

I hope that the slide decks presented by SCSJV at these meetings, provided to you 24/10/2023 by email provide some useful reference regarding the facility.

Surface water discharge – HS2 Act (2017) Schedule 33

The surface water drainage system for the facility has a single discharge point. The discharge is consented by the Environment Agency under the HS2 Act (2017) Schedule 33 (Part 5) – consent reference HS2/P10415 (Schedule 33 consent). The discharge is rainwater and water used in dust suppression only. Waste storage is covered and the treatment process enclosed. Rainfall is onto building roofs and haul roads, and there is no direct contact with waste material.

The treatment process (lime mixing in pugmills) does not use water and there are no discharged waste waters from the process. Except for a minor amount of collected condensate, and water used to lubricate conveyors – which are contained and disposed separately, as described in the Management Systems and Procedures document.

The surface water drainage system includes treatment – passing through a Siltbuster (SB2) from an attenuation pond (Pond 1), and provided with an oil water separator (interceptor) and an initial Siltbuster (SB1) (when required). The Schedule 33 consent sets limits on flow rate, suspended solids, pH, iron / acrylamide, and requires no visible oil / grease.

As advised (pre-application meeting 09/10/2023) we have undertaken to take samples (i.e. 3-6) from Pond 1 / SB1 and analyse for the suite of metals specified for pasty wastes in the Waste Treatment BREF. Expecting that none will be detected, or be above acceptable range – we will use these samples to support our proposal that no additional analysis is required and that the installation permit should refer only to the Schedule 33 consent regarding requirements for the water discharge.

Determination timeframe

The treatment facility (STA) has been operational since July 2023. Currently the STA facility is operating with a Local Enforcement Position (LEP) in place. This LEP allows the facility to operate

at full treatment capacity, pending this variation of the current bespoke waste activity to an installation permit. The LEP is valid until 31st January 2024 (31/01/2024).

We greatly appreciate that this permit application is being expedited as far as is possible, and is given considerable attention. We have been working closely with the Environment Agency to progress this installation permit. We hope that assessment of the application can begin right away.

The STA facility has been designed to fully support the SCS Northolt Tunnels West drive. Alternative treatment measures are less efficient (i.e. per tonne of material), and if the STA is not authorized to be operating from 31st January, this will impact the tunnelling programme and incur higher daily operating costs.

Table of Documents

Document status – NEW / UPDATED / no change – means in relation to the documents submitted for the current permit (to June 2023); document numbers and final version reference (for documents in this pack for the installation submission):

Document	Installation Permit Application	Document Reference
Documents submitted for assessment:		
Best Available Techniques Assessment (BAT)	NEW – Submitted 27/10/23	1MCo4-SCJ_SDH-EV-REP-SS05_SL07-000023 Version Co1
Management Systems and Procedures (MS&P)	UPDATED – Submitted 27/10/23	1MCo4-SCJ_SDH-EV-PRO-SS05_SL07-000004 Version Co2
Form B6	NEW – submitted 27/10/23	Form B6 - SCS HS2 STA 20231027 Ref. EPR-GB3301GY
Documents submitted for reference:		
Dust and Emissions Management Plan (DEMP)	No Change	1MCo4-SCJ_SDH-EV-PLN-SS05_SL07-000013 Version Co3 DEMP Appendices A2 and A3
Noise and Vibration Management Plan (NVMP) (+Noise Impact Assessment)	No change	1MCo4-SCJ_SDH-EV-PLN-SS05_SL07-000015 Version Co2 NVMP Appendix B – Noise Impact Assessment (Doc ref. 1MCo4-SCJ_SDE-EV-REP-SS05_SL07-000018_C05)
Site Operating Plan (SOP)	No change	1MCo4-SCJ_SDH-EV-PLN-SS05_SL07-000016 Version Co2
Site Condition Report (SCR)	No change	1MCo4-SCJ_SDH-EV-REP-SS05_SL07-000009 Version Co1
Environmental Receptors Plan	No Change	1MCo4-SCJ_SDH-LS-DGA-SS05_SL07-711019
Human Receptors Plan	No Change	D-SCR3-1MCo4-SCJ_SDH-LS-DGA-SS05_SL07-711020

GI Locations Plan	No Change	1MCo4-SCJ_SDH-LS-DGA-SSo5_SLo7-711021
Permitted Area Boundary Plan	No Change	Appendix 1 - STA NTS Permitted Area Boundary Plan Rev 2 - March 2023
Documents included in installation application – NOT INCLUDED IN THIS PACK:		
Application Forms (Part A, C2, C3, F1)	UPDATED – Submitted 16/06/23	1MCo4-SCJ-EV-APP-SSo5_SLo7-000178 Version C01
Non-Technical Summary	UPDATED – Submitted 16/06/23	1MCo4-SCJ-EV-APP-SSo5_SLo7-000177 Version C01

Many thanks in advance for your attention on this matter.

Signed:

Yours Sincerely



Elizabeth Lyon

Environmental Consents Manager
SCS Railways (SCSJV)