Date: 16th September 2022

EA Ref: EPR/XP3005LB/V002 – Draft Schedule 5

SLR Ref: 416.00036.00973

Subject: Runcorn ERF Schedule 5 Response

Introduction

The Environment Agency (EA) issued a Schedule 5 Notice requesting further information in response to the Odour Assessment and Odour Management Plan (OMP) undertaken as part of an Environmental Permit Variation Application at Runcorn Energy Recovery Facility (ERF).

Summary of Updates

The odour assessment provided in support of the permit variation application has been updated, in consideration of the following:

- Site operations at the Runcorn ERF have changed in the time that has elapsed since the original assessment was produced (June 2021). As such, the assessment has been updated to reflect the current site operations;
- items 3C, 3D and 7 of the Schedule 5 document provided by the EA requires revision of the assessment; and
- CAR0435409[1], received in August 2022 presents comments alluding to further investigation into a scenario in which a greater number of trucks (containing waste) are present on Site, queuing to enter the Tipping Hall.

As such, the updated odour assessment submitted (v2.2)[2] reflects the current site operations (in consideration of the proposed permit variation), and also addresses the comments provided by the EA within the Schedule 5 document and CAR0435409. These updates as summarised below:

- Operational updates:
    - The frequency of trains received at the railyard has been updated:
        - Weekdays: increased from 2 trains per day to 3 trains per day;
        - Weekdays: the approximate number of waste containers delivered via rail over the day remains approximately the same (previously 150, now 153);
        - Saturday: reduced from 2 trains per day to 1 train per day;
        - Saturday the approximate number of waste containers delivered via rail over the day is reduced (previously 120, now 51);
    - The anticipated number of trucks (containing waste) queuing for the tipping hall has been updated:
        - Weekdays: increased from 3 trucks queuing (on the Tipping Hall ramp) between 06:00 and 23:00 to up to 14 trucks queuing (on the Tipping Hall ramp

[1] Compliance Assessment Report 0435409, submitted by the EA to the operator on 19th August 2022.

[2] SLR report: 416.00036.00973_Runcorn ERF_Odour Assessment_v2.2, dated September 2022.

and in overflow locations A and B) between 06:00 and 23:00, as outlined in Table 5-3 of the updated odour assessment;
    - Saturday: increased from 1 truck queuing (on the Tipping Hall ramp) between 06:00 and 23:00 to up to 2 trucks queuing (on the Tipping Hall ramp) between 06:00 and 14:00, as outlined in Table 5-4 of the updated odour assessment;
- Updates in relation to EA requests:
    - A further modelling scenario has been undertaken as a sensitivity analysis in order to assess the result of additional trucks queuing for access to the Tipping Hall (over and above the number queuing under normal operations). The results of the sensitivity analysis undertaken are presented in Appendix E of the odour assessment.

Responses to items raised in Schedule 5 document:

The updates undertaken in response to the items raised within the Schedule 5 document issued by the EA as summarised below.

EA item #1:

> *Table 4.1 of the OMP states that abnormal loads will be rejected. Define what would be considered an abnormal load.*

Table 4.1 of the OMP has been updated. The passage relevant to the above request is outlined below:

All waste received at the Site is monitored by the Fuel Reception Operators (FRO) to ensure it complies with the waste transfer note description and the permitted waste types for the facility (otherwise it would be defined as an 'abnormal load'). Any abnormal loads are rejected (i.e. turned away and not received at the Site).

EA item #2:

> *Table 4.1 of the OMP states that the vehicular access door "should be closed when not in use, where possible". What circumstances may this not be possible? Provide specific and justified reasons why the doors will remain open, other than when vehicles are entering or exiting the building.*

Table 4.1 of the OMP has been updated. The passage relevant to the above request is outlined below:

Exceptions where the doors may have to remain open for a prolonged period include the abnormal events identified in Table 6.1 of the OMP including:

- Maintenance – of the door;
- Damage – to the door, to be fixed as soon as possible; and
- Use as pedestrian access if needed, i.e. pedestrian door has broken.

EA item #3A:

> *Table 4.1 of the OMP states that Highly Odorous loads are directed to the tipping hall as quickly as possible (bypassing the queue). Provide further detail on how lorries holding highly odorous waste will be identified and how the queue would be bypassed. What contingency procedures are in place to prevent odour impacts to receptors if odorous loads cannot enter the tipping hall immediately upon arrival to site?*

Table 4.1 of the OMP has been updated. The passages relevant to the above request are outlined below:

Highly odorous loads are identified by the FRO during monitoring via direct sniffing. The FRO is aware of typical waste odours from the incoming waste, and can identify any lorries from which the odour is significantly stronger, or of a higher offensiveness than usual.

Highly odorous loads are directed to the Tipping Hall as quickly as possible, bypassing the queue whilst the rest of the traffic is held (to reduce the time over which such loads are retained on Site). Traffic will be held whilst the highly odorous load passes the queue on the right hand side of the Tipping Hall ramp. If a highly odorous load cannot enter the tipping hall immediately upon identification, the load would be rejected.

EA item #3B:

Table 3-1 of the OMP states that the maximum time held on site for all waste is 72 hours, but it is not clear if this includes time within the tipping hall or solely outside of the tipping hall in lorries. Clarify the maximum time that any wastes will be held solely outside of the tipping hall.

Table 3.1 of the OMP has been updated to reflect the revised position. The passages relevant to the above request are outlined below (table notes):

48 hours represents a worst-case estimate of the maximum time waste would be retained on the Site prior to deposit within the Tipping Hall. The anticipated maximum length of time waste may be held outside of the Tipping Hall is:

- Approximately 6 hours within road trailers, during periods of operational issues with the Site process (i.e. Tipping Hall crane or door breakdown); and
- Approximately 48 hours in rail containers, during periods of operational issues with the Site process (i.e. railyard crane, Tipping Hall crane or door breakdown). It should also be noted that it is part of normal Site operations for waste received via the 23:00 train on a Saturday to remains on the Site for 32 hours prior to offloading at 07:00 on Monday.

EA items #3C & 3D:

What is the maximum number of lorries that will be held onsite (outside of the tipping hall) at any given time? Provide further detail on where these standing lorries will be located. Details can be provided using an updated site plan and/or a narrative description.

Note that your odour risk assessment refers to only 3 vehicles queuing at any time between 6am-11pm (2 containing RDF and 1 containing MSW). The odour isopleth is notably stronger in concentration in the immediate vicinity of this queue so queue length, location and quantity is a key factor. The commitments / assumptions made in the odour risk assessment should mirror the commitments / assumptions made in the OMP and vice versa.

Also note: It should be ensured that any standing vehicles are stood as far away as possible from away from sensitive receptors.

Provide further detail on what measures will be in place to ensure that vehicles do not queue outside the area modelled in the odour risk assessment. In what circumstances will lorries be turned away from the site in order to prevent queuing? Table 4-1 states up to 6 trucks queuing but the odour risk assessment states only 3 trucks. How are you justifying 6 trucks as a trigger level?

As outlined within the opening few paragraphs of this document, the odour assessment has been updated to reflect the current site operations (which have changed since the original modelling

assessment was produced in June 2021), as well as to address the comments outlined by the EA within items 3C and 3D of the Schedule 5 and CAR0435409.

A summary of the updates undertaken in relation to item 3C are presented below:

- A further modelling scenario has been undertaken (sensitivity analysis) in order to assess the cumulative effect of an additional number of trucks queuing for access to the Tipping Hall, over and above the number anticipated under normal operations. The results of the sensitivity analysis undertaken are presented in Appendix E of the odour assessment; and
- The dispersion modelling has concluded that odour concentrations at sensitive receptors are below the relevant impact criterion in consideration of up to 14 trucks queuing at the Site for the timings as presented in Table E-1 of the odour assessment.

The maximum number of trucks (containing waste) which can queue for access to the Tipping Hall, as well as identification of the designated areas in which trucks can queue have been defined on the basis of the results of the odour assessment. The maximum number of trucks which can queue are defined within Table 4-1 of the OMP. The location of the designated queuing areas is presented in Table 3-2 of the OMP. The relevant passaged of text from Table 4-1 of the OMP are transposed below:

Under normal Site operations, up to 14 trucks can queue for access to the Tipping Hall (7 on the Tipping Hall ramp, a further 3 at location A and 4 at location B) during peak operations (usually between 06:30 and 12:00 on weekdays). Outside of peak operations, trucks should queue only on the Tipping Hall Ramp (capacity of up to 7 trucks). Site operatives will ensure the queueing trucks are located within the relevant designated areas as presented in Figure 3-2.

The limits outlined above has been defined in reference to the odour modelling assessment undertaken . Should further trucks arrive at the Site, they would be turned away until space is available to ensure the number of trucks queuing remains below the numbers outlined above.

However, during exceptional circumstances (such as post-Christmas), the arrival of a large number of incoming waste vehicles at one time could result in a queue for access to Site along the Barlow Way approach road. In an exceptional circumstance such as this, site operatives will allocate additional space on the Site for the trucks to park (to avoid queuing of trucks along Barlow Way), thereby minimising potential off-site odour impacts (most notably on Clarke Terrace). Space would first be allocated within the designated queuing areas (see Figure 3-2), but where this capacity is exceeded, further trucks would be directed to queue on the access road around the Flue Gas Cleaning area (see Figure 3-1). These events are anticipated to be infrequent and short-term in their nature, and would not form part of normal operations.

EA item #4:

> *What is the escalation procedure if 3rd party hauliers are persistently coming to site with lorries that have not been suitably cleaned and are odorous in nature?*

Table 4.1 of the OMP has been updated. The passages relevant to the above request are outlined below:

The Runcorn Site requests that hauliers keep up a good standard of cleanliness of their vehicles and will report back any that they feel could be contributing to an odour on Site. This is proactively managed by the Tipping Hall supervisor and their team. The tipping hall supervisor would escalate to the Head of Contracts who would send a communication to the company that the cleanliness of their vehicle(s) is not acceptable. The situation would be monitored, and if improvements are not made, this may then result in tipping restrictions (i.e. that haulier is no longer allowed to tip at the Site) until the situation is resolved.

EA item #5:

Provide the full details of the scoring system contained within VDI 3940 being referred to as detailed in section 5.3.1 of the Odour Management Plan.

Section 5.3.1 of the OMP has been updated to include the requested information.

EA item #6:

Provide a copy of ERF-RUN-OPS-SHE-DWG-001 – Odour Monitoring Plan as detailed in section 5.3.1 of the Odour Management Plan.

This document is provided as part of the submission in response to this Schedule 5.

EA item #7:

In section 1,1 of the Odour Risk Assessment it states that "For the purposes of this assessment, the receipt of MSW has been assumed at a rate of 110,000 tpa." Please confirm the tpa that was used for the assessment. The site is permitted to take 1,100,000 tpa.

I am unable to locate the text quoted in item 7 above within the original odour assessment submitted. Irrespective of this, the odour assessment has been updated, and as such the text within Section 1.1 has been revised to address the point raised in item 7 above. The text from Section 1.1 of the odour assessment is transcribed below:

The Runcorn ERF operates under Environmental Permit reference: EPR/XP3005LB as issued by the Environment Agency (EA). The ERF is permitted for the receipt of up to 1,100,000 tonnes per annum (tpa) of a range of non-hazardous waste types including Refuse Derived Fuel (RDF), commercial and industrial (C&I) wastes and source segregated packaging for combustion to generate electricity.

Viridor has submitted an Environmental Permit variation application seeking to facilitate the receipt of up to 110,000 tpa of MSW at the Site. MSW received would be offset by an equivalent volume of RDF, therefore this proposed variation would not seek an increase to the permitted volume of material which can be received at the Site. The Permit variation application does not therefore seek an uplift above the currently Permitted 1,100,000 tpa.

This assessment has considered normal Site operations (receipt of RDF), as well as consideration of the proposed variation to the incoming waste stream (receipt of up to 110,000 tpa of MSW).

Further details of typical waste throughput at the Site (which have been applied within the modelling assessment) are presented in Section 3.1 of the odour assessment, and are transposed below:

Under current operations, the Site almost exclusively receives RDF, which is predominately derived from MSW. On average, during normal Site operations, the facility receives 3,400 tonnes of waste each weekday, 1,500 tonnes of waste on Saturdays and receives no waste on Sundays. Approximately 60% of waste material received is received by road, and the remaining 40% at the railyard.

List of documents provided in Schedule 5 response:

- 416.00036.00973_Runcorn ERF_Odour Assessment_v2.2
- 416.00036.00973_Runcorn ERF_Odour Management Plan_v2.2
- 416.00036.00973_Runcorn ERF Schedule 5 Response_v1.1
- Runcorn_v2_Proposed permit variation (compressed model input files)
- Runcorn_v2_Sensitivity analysis (compressed model input files)
- ERF-RUN-OPS-SHE-DWG-001

Closure

SLR would like to take this opportunity to reiterate that the updated odour assessment submitted in this Schedule 5 response (v2.2) has been updated from the original odour assessment submitted with the permit variation application (v1.3). The updates to the odour assessment have been undertaken in consideration of the current site operations (which differ from at the time of the original assessment, now more than a year ago), in consideration of the request outlined within CAR0435409 and to address the comments raised within the Schedule 5 document (EPR/XP3005LB/V002 – Draft Schedule 5).