

Our Ref: Le02 – Runcorn ERF Sch5Resp2

25th November 2022

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

Dear Sirs,

The Environmental Permitting (England and Wales) Regulations 2016
Runcorn ERF: Variation to Permit Number EPR/XP3005LB

Further to your second Schedule 5 Notice dated 11th November 2022 regarding the above application and a request for additional information required to determine our application, please find our response to your queries set out below.

- 1. Provide clarity as to whether it is possible to manage vehicles coming onto site in a manner which prevents the need for queuing outside of the reception hall to the extent described in the revised Odour Management Plan (OMP) v2.2. It is stated in the revised OMP that once the limit of 14 vehicles queuing for the Tipping Hall has been reached, vehicles will be turned away. It is not clear why vehicles can't be turned away before the proposed limit of 14 is reached. Provide information on what further can be done to reduce the number of vehicles queuing on site.***

Viridor's Response:

We must emphasise even though the OMP v2.2 states that vehicles will be turned away once 14 vehicles are queued on site, typically the number of vehicles queued at any one time is much less than this.

Location B has now been eliminated from the site's vehicle management plan as a holding area. Once the tipping hall ramp and Location A are fully utilised vehicles will be routed to the road adjacent to the Flue Gas Treatment area. This area is further from potentially sensitive receptors and up to 19 vehicles can be held on site during normal operation in accordance with the EA's H4 Odour Guidance.

When vehicle numbers are high, this is experienced for a limited period of time. In practice, during normal operation it would be rare to have to turn away vehicles.

Any difficulties, such as an unanticipated outage, weighbridge malfunction, crane breakdown etc. that could cause a major delay on site are promptly communicated to customers by Viridor to avoid queuing on site.

It stands to reason that Viridor is unable to anticipate road network disruptions that would affect the way its clients bring waste to the facility.

Finally, it must also be noted that there are sometimes issues outside of the control of the site that could contribute to the number of vehicles attempting to access site at any one time. Our answer to Q2a demonstrates that we look to minimise any potential off site impact proactively.

- 2. Location B is in close proximity to residential receptors DR-1 and DR-2 as described within the Odour Impact Assessment. It is considered, given the proximity to residential receptors and layout of the site, vehicles present in location B present a higher risk of creating an odour nuisance when compared to location A and the Tipping Hall ramp. If the response to Question 1 doesn't already mean that the use of location B will no longer be necessary, provide information on:**
- a. what other solutions there are instead of using location B, for example the use of a location onsite further away from residential receptors;**

Viridor's Response:

We accept that Location B is the closest to nearby receptors. As such, Viridor will situate vehicles on site in the following order of preference:

- (1) - Tipping hall ramp,
- (2) - Location A, and
- (3) - Loop road around the Flue Gas Treatment area,

Other vehicles with low odour potential (e.g., IBA/APCr vehicles), will only be situated in Location B.

Please refer to the technical memo which details additional dispersion modelling scenario considering the use of an alternative to 'Location B' for trucks queuing to access the Tipping Hall. In accordance with the EA's H4 Odour Guidance, it is determined that the proposed change to site operations as described in the environmental permit variation (i.e., reception of MSW) will not result in adverse odour effects at sensitive receptors.

When the tipping hall ramp and Location A are constantly occupied (11) and 3 vehicles are parked in the FGT area, customers and Viridor's fuel supply team will be contacted. Viridor would instruct deliveries to the facility to be halted until the issue that is causing the backlog is resolved. Applying this logic will provide a buffer of 5 vehicles that could theoretically be already on their way to the site and avoiding Viridor from having to turn away vehicles.

Instigation of this control mechanism will be reviewed and its effectiveness evaluated.

or

- b. provide details of further mitigation measures that could be used to afford greater protection to residential receptors DR-1 and DR-2, for example only sealed vehicles allowed to queue in this location or only storing demonstrably low odour waste types in this location.**

Viridor's Response:

As stated in the Q2a response, Location B will only be utilised by vehicles with a low odour potential, vehicles delivering waste will not be permitted to park in this area.

- 3. Taking into account your responses to questions 1 and 2, provide information on what actions will be taken by the site in case of an odour issue arising as a result of any vehicles being parked outside of the Tipping Hall. This should include but not necessarily be limited to the use of sealed trailers for waste coming onto site and a further reduction in vehicles waiting outside of the tipping hall.**

Viridor Response:

The facility is run effectively with the aim of processing vehicles from entry to exit in the shortest amount of time possible. A staff member checks the queue on the ramp for odours during peak hours when the number of vehicles can be large. Two times each week, independent odour testing is done both on-site and off-site, with appropriate action taken when needed.

In the highly unlikely event that multiple vehicles parked outside the tipping hall were contributing to an offsite odour issue, those vehicles causing the odour issue would be instructed to move off the tipping hall ramp. This would be done by routing them in and out of the tipping hall and then directing them to the FGT loop road. They would be accepted in to the tipping hall as quickly as possible when a tipping slot was made available. An investigation on the cause of the odour issue would be undertaken and appropriate action taken to minimise/prevent a reoccurrence.

Furthermore and as stated in the OMP, should a delivery vehicle be deemed to be particularly odorous by site staff, such vehicles will be preferentially moved from the queue to the tipping hall to minimise any potential off site impact.

I trust the information supplied is adequate to enable you to determine this application. If you require any clarification, please get in touch.

Yours sincerely,



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