

Mrs. Anita Manns
Mott MacDonald
Mountbatten House
Grosvenor Square
Southampton
SO15 2JU

Our ref: EPR/KP3394ZE/V007

Date: 09/06/2023

Dear Anita,

We need more information about your application

Application reference: EPR/KP3394ZE/V007

Operator: Northumbrian Water Ltd

Facility: Howdon STW, Northumberland Dock Road, Howden, Wallsend, Tyne & Wear, NE28 0QD,

Thank you for your application received on 28/02/2023.

Unfortunately the application payment you sent is incorrect. The correct application charge is £21,215. This leaves a refund of £400 to be provided.

Application Fee

- £13,984 - 100% application fee for - S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment, including the biomethane upgrading plant
- £3,965 - 50% application fee for the physical treatment of non-hazardous waste relating to the waste import to the head of the works. (Note subject to waste activity being confirmed.)

Additional Assessments (see below for further details)

- Odour management plan – a fixed charge of £1,246
- Habitats assessment – a fixed charge of £779
- Emission Management Plan – a fixed charge of £1,241

I need to ask you for some missing information before I can do any more work on your application. Please provide us with more information to the following questions.

1) Import of Waste to the Head of Works

You have identified EWC codes 16 10 02 as being imported to the head of works. This activity is not a directly associated to the S5.4 A(1) (b) (i) activity being applied for, but may be a waste activity in its own right. *(Note: this would be subject to confirmation of no treatment prior to acceptance, which if carried out could make this an installation activity depending on tonnage received).* We can see no further details on how this waste operation

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Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

will be undertaken, or how you will comply with guidance Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk).

Provide a non-technical summary in line with guidance Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (www.gov.uk) for the activity identified as the import of waste to the head of works.

2) Waste accepted to the Head of the works

Under guidance <https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities/6-emissions-control> you must assess the fate and impact of the substances emitted to water and sewer following the Environment Agency's risk assessment guidance. On review of your site plan you have not included an emission point for the discharge to the head of the works, or assessed the fate and impact of substances discharged to the head of the works.

- a) Submit an updated 'Howden STC Site Layout Plan' to include an emission and sampling point for emissions returned to the head of the works as a result of the acceptance of 16 10 02 to the head of works.
- b) Provide a written statement with a commitment to undertake the sampling and analysis in line with Environment Agencies Risk assessment guidance for the wastewaters discharged to the head of works emission point.
- c) Provide a written statement with a commitment that those undertaking the sampling and analysis will be by accredited to MCERTs or provide evidence of equivalent standards.
- d) Provide a summary of the sampling and analysis methodology of the effluent discharged and specify the likely pollutants in the effluent (guidance here Monitoring discharges to water: guidance on selecting a monitoring approach - GOV.UK (www.gov.uk) and Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk))

3) Directly Associated Activities

Your current permit identifies emission point A20 (CHP 4) operating on natural gas. It is unclear if this is directly associated to the activity S5.4 A(1) (b) (i) applied for. Guidance 'Understanding the meaning of regulated facility' (RGN2) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964487/LIT_6529.pdf) sets out the requirements for activities to be classified as "directly associated". Confirm if emission point A20 is a directly associated activity to the section S5.4 A(1) (b) (i) activity.

4) Permit YP3331HQ/V003

Your existing permit includes emission points A7 – A18 identified as Bursting discs and safety valves. These have not been included in your emission points. Either explain why these have been removed, or add them to 'Howden STC Site Layout Plan' as emission points.

5) Emission point plan

You have identified a backup generator (NGRNZ 33596 66366) and a biomethane upgrade plan (NZ 33682 66283) however these have not been identified as emission points of your site plan. Update 'Howden STC Site Layout Plan' to include the above emission points.

6) Emissions to air – Biogas upgrading plant

You have provided an overview of the H1 assessment relating to emission point 'Biomethane Plant Stack' (NGR: NZ 33682 66283). Provide a copy of the completed H1 assessment tool.

7) Provide Information Specified in application Form – Part C3

- a) Question 2 Point source emissions to air, water and land - You have provided 'Table 6.2: Part C3, Question 2: Point source emissions to air' however this does not include OCU 3. Provide an updated table 6.2 that includes OCU 3.
- b) Question 2 Point source emissions to air, water and land – You have identified that Effluent from centrate returns, cake storage and sludge thickening process is discharged off site to the Howden Wastewater Treatment Works. Effluent discharged to the head of the works is a point source emission to sewer. BAT conclusion 3 requires operators to have an emissions inventory for the effluent. We acknowledge that applicants may not hold this information in order to inform a quantitative risk assessment for existing discharges. For the purpose of duly making, provide the following information:
- i. Question 9 of form C6 has identified the 'inlet sampling point' and 'effluent sample point' that are not located within the permit boundary. Provide a revised 'Howden STC Site Layout Plan' which identifies the effluent sampling point/s and emission point/s for the effluent discharge from the installation inside the permit boundary and provide the national grid reference for the emission point/s and sampling point/s. (Note: the WwTW does not form part of your permit boundary and as such cannot be treated as a treatment process, your C6 form should reflect this)
 - ii. BAT 3 requires you determine the composition of **all** relevant pollutants to enable full characterisation of your emissions. Guidance Surface water pollution risk assessment for your environmental permit - GOV.UK (www.gov.uk) requires you must "identify the pollutants released from your plant". The guidance states, that you must "Make sure the laboratory tests for all pollutants which you expect to find in the discharge and that they use an appropriate 'minimum reporting value' (MRV) (usually 10% of the environmental quality standards (EQS))." Confirm that you sampling will meet the above guidance, and will not be limited to the current parameters identified (pH, suspended solids, BOD, COD and ammonium)

Note: The WwTW does not form part of the permit and should not be identified as a treatment method/sampling location. Under BAT 7 the 'Biological treatment of waste', 'Treatment of water-based liquid waste' and 'All waste treatments' are relevant to the process being carried out. It should be noted that regardless of the treatment process, a full characterisation of the emission must be carried out and as this cannot be provided to demonstrate emissions are insignificant, we would include the relevant indirect BAT emission limits for the relevant waste treatment processes in any granted permit as outlined in BAT 6, 7 and 20, with requirements to fully characterise your emissions.

Please send the information, quoting the above application reference, to:

Email address: sarah.raymond@environment-agency.gov.uk

Please send the information within 10 working days of this letter.

If we do not receive the information within 10 working days we will return your application.

If we do receive the requested information within 10 working days, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin

determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019>

If you have any questions please phone me on 07557139052 or email sarah.raymond@environment-agency.gov.uk.

Yours sincerely

Sarah Raymond
Permitting Officer - Installations