

## Northumbrian Water Howdon STC IED Permit Application Request for further information response v3

<b>Environment Agency reference:</b>	EPR/KP3394ZE/V006	<b>Date:</b>	21/06/2023
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**Table 1: Request for further information response**

Question	Response
<p><b>1. Import of Waste to the Head of Works</b>  Provide a non-technical summary in line with guidance Non-hazardous and inert waste: appropriate measures for permitted facilities - Guidance - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>) for the activity identified as the import of waste to the head of works.</p>	<p>EWC code 16 10 02 will be imported to the Head of Works as a waste activity – applied for as part of the IED application. Howdon STW Tankered Waste Acceptance: Non-technical Summary 130623 provides details of the operation and demonstrate how NWL will comply with the relevant guidance - Non-hazardous and inert waste: appropriate measures for permitted facilities.</p> <p>NWL confirm there is no treatment prior to acceptance.</p>
<p><b>2. Waste accepted to the Head of the Works</b>  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 Agency's Risk assessment guidance for the wastewaters discharged to the head of works emission point.</p>	<p>2a) An updated site plan -100105164_MSD_SiteLayoutPlan_HOW v6 - includes the emission and sampling point for emissions returned to the Head of the Works (inlet works, emission point AA), as a result of the acceptance of 16 10 02.</p> <p>2b) Howdon STW Tankered Waste Acceptance: Non-technical Summary 130623 provides details of the operation of waste accepted at the head of the works covering points and contains a written statement of commitment to undertake the sampling and analysis in line with the Environment Agency's Risk assessment guidance for the wastewaters discharged to the head of works.</p>



Question	Response
<p>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.</p> <p>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))</p>	<p>2c) Howdon STW Tankered Waste Acceptance: Non-technical Summary 130623 provides details of the operation of waste accepted at the head of the works covering points and contains a written statement of commitment that those undertaking the sampling and analysis will be by accredited to MCERTs or provide evidence of equivalent standards.</p> <p>2d) Howdon STW Tankered Waste Acceptance: Non-technical Summary 130623 provides a summary of the sampling and analysis methodology of the effluent discharged and specify the likely pollutants in the effluent in line with the relevant guidance.</p>
<p><b>3. Directly Associated Activities</b> Confirm if emission point A20 is a directly associated activity to the section S5.4 A(1) (b) (i) activity.</p>	<p>It has been confirmed that emission point CHP4 (A20 on existing site plan) operates on natural gas. Therefore, this emission point is not considered to be a DAA to the S5.4 activity. This emission point still remains in the updated site plan as A8 for reference purposes.</p>
<p><b>4. Permit YP3331HQ/V003</b> 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.</p>	<p>See updated site layout plan 100105164_MSD_SiteLayoutPlan_HOW v6 These emission points are included on the permit, but have been consolidated and renamed from the original permit for simplicity and relevance to the IED permit application. It is anticipated that this site plan will supersede any previous plans relating to the site due to permit consolidations and legislation changes.</p>
<p><b>5. Emission point plan</b> You have identified a backup generator (NGRNZ 33596 66366) and a biomethane upgrade plant (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.</p>	<p>These assets were identified on the site plan, but the emission point was accidentally omitted. These have been changed to the emission points A19 and A18 respectively to be in keeping with the format of the site layout plan. See updated site layout plan 100105164_MSD_SiteLayoutPlan_HOW v6.</p>
<p><b>6. Emissions to air – Biogas upgrading plant</b></p>	<p>An overview was provided due to the limit restrictions for uploading files to PSC Land. A copy of the completed H1 assessment tool has been</p>

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**Question**

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.

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**Response**

provided. (\*NB the below is provided for reference purposes – the link is blocked).



H1TOOL\_2.78\_Howden.mdb

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**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.

ii. BAT 3 requires you determine the composition of all relevant pollutants to enable full characterisation of your emissions. Guidance Surface water pollution risk

7a) OCU3 and relevant NGR has been included in the updated in table 6.2 of MSD - 100105164\_MSD\_HOW v3. To ensure this corresponds to previous emission points we have also included the existing name it is identified as (OS12).

7b i) Updated on site plan 100105164\_MSD\_SiteLayoutPlan\_HOW v6 and C6 form (100105164\_PartC6\_HOW v3). The site layout plan identifies these points as emission points AA, - inlet works, AB – returned liquors discharge and AC – returned liquors monitors. These have been included within the site boundary by way of a separate green line around each of these emission points. The NGRs are provided on the site plan.

7b ii) NWL confirm that all sampling will meet the guidance for surface water pollution risk assessment for your environmental permit and that NWL will determine the composition of all relevant pollutants, to enable full characterisation of its emissions, and will not just be limited to the current parameters identified (pH, suspended solids, BOD, COD and ammonium).

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Question	Response
<p>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)</p>	
<p><b>Additional information</b>  <b>Changes made to the Main Supporting Document - 100105164_MSD_HOW v3.</b></p>	<p>Update document version numbering throughout          Amended table 6.2 to include OCU3, NGRs and add the emission point numbers to correspond with the site layout plan          100105164_MSD_SiteLayoutPlan_HOW v6.</p> <p>Remove the AD biofilter as a separate emission point as this part of OCU2.</p> <p>Amended the EWC codes (Appendix A) to:</p> <ul style="list-style-type: none"> <li>i) remove:             <ul style="list-style-type: none"> <li>• 19 06 06 as NWL do not plan to co-digest in the immediate future and will apply for the relevant permit variation, at a later date, if this changes.</li> <li>• 20 03 04 as this is a controlled waste</li> <li>• 20 03 06 as NWL does not accept these wastes on site either to the head of the works, or as an import from other sites for storage. Wastes under this EWC are generated on site through the wastewater treatment process and removed as necessary; and</li> </ul> </li> </ul>



**Question**

**Response**

	<ul style="list-style-type: none"><li>• 19 08 01 and 19 08 02 as these are not accepted at the site (only produced by the site as part of the wastewater screening process)</li><li>ii) Confirmed 19 02 06 is accepted pre-digestion in the table of EWC codes in appendix A</li></ul>
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