

Response Schedule

EA Reference	EA's comment	Documents provided to address comment	Changes made in relevant reports to address EA's comments	Where these changes are implemented					
1. Charges	You have not provided the daily and annual throughput for each activity you are applying for.		Activities & Operating techniques (5827-CAU-XX-XX-RP-V-0305)	Table 2					
			Leachate and Aqueous treatment (5827-CAU-XX-XX-RP-V-0307)	Sections 1.1.4, 2.4.5					
	The EWC codes for each individual activity being applied for are not clearly identified for each activity.	Updated Waste Lists	Supporting document (5827-CAU-XX-XX-RP-V-0301)	Appendix 3					
			Activities & Operating techniques (5827-CAU-XX-XX-RP-V-0305)	Appendix 1					
	We note that activity AR5 in your application has been changed from an installation to a waste operation referencing filtration for Reverse Osmosis. This plant is detailed as 300 tonnes per day, this throughput would make this an installation activity under a Section 5.4 A(1)(a)(ii) as advised in your enhanced pre application. You have not applied for this activity as an installation or provided justification of why this is a waste activity.		Activities & Optech (5827-CAU-XX-XX-RP-V-0305)	Section 1.3.12, Table 1					
			BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	Sections 1.2.2 and 1.2.3					
			Supporting document (5827-CAU-XX-XX-RP-V-0301)	Sections 6 and 7 incl the tables therein					
	Your application is not clear if your processes are for recovery or disposal. In line with RGNI 2: Understanding the meaning of regulated facility - GOV.UK you must clearly demonstrate the primary purpose of the activities as this may affect how they are permitted. Most of your activities appear as primarily for recovery, however for ammonia stripping and biological treatment it is unclear if this is for recovery or disposal as your process flows do not confirm this. Note: If these activities are for recovery and disposal, you will need two separate activities.	Updated Process Flow Diagrams	BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	Figures 1 and 7					
			Supporting document (5827-CAU-XX-XX-RP-V-0301)	Appendix 6					
			BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	Figures 1 to 12					
You have applied for Section 5.3 A(1)(a)(iii) disposal or recovery of hazardous waste with a capacity exceeding 10 tonnes per day involving blending or mixing (AR13), but the type of treatment, tonnages and waste types for this activity is not clear.		Activities & Operating techniques (5827-CAU-XX-XX-RP-V-0305)	Section 1.3.12, Tables 1 and 2						
		BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	Section 3.3						
2. Form C2	You have not provided a site drainage plan, this is required. See guidance Develop a management system: environmental permits for what this should include.	Site Drainage plan ref. WHS10192-T01-0001	Activities & Optech (5827-CAU-XX-XX-RP-V-0305)	Appendix 6. Search the report for where appendix 6 is mentioned.					
			BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	Appendix 5. Search the report for where appendix 5 is mentioned.					
			BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	Appendix 6. Search the report for where appendix 6 is mentioned.					
	Emission Point map shows EP01-26, the specification list provided identifies EP 01,02,03,04,06,14,16,24 and 26. The OMP details emission points with potential odours. There are no NGR's provided for these emission points within the application.	Drawing ref. 5827-CAU-XX-XX-DR-V-1805; Drawing ref. 5827-CAU-XX-XX-DR-V-1807; Drawing ref. 5827-CAU-XX-XX-DR-V-1808; Emissions point table containing grid references..	BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	Search the report for the drawing number and updated emissions point; Appendix 2, Tables 1 and 2.					
				Drawing ref. 5827-CAU-XX-XX-DR-V-1809; Emissions point table containing grid references.	BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	Search the report for the drawing number and updated emissions point; Appendix 3, Table 1, BAT 3, BAT 14.			
						Drawing ref. 5827-CAU-XX-XX-DR-V-1808; Drawing ref. 5827-CAU-XX-XX-DR-V-1809; Emissions point table containing grid references..	OMP (5827-CAU-XX-XX-RP-V-0310)	Table 3, Appendix 3, renamed emissions point included in the relevant sections. Use the emissions point table to verify correctness.	
								Supporting document (5827-CAU-XX-XX-RP-V-0301)	Appendix 9, Sections 3.5.2, 3.14, 5.3, 5.22, 5.23
						Drawing ref. 5827-CAU-XX-XX-DR-V-1805; Emissions point table containing grid references.	Activities & Operating techniques (5827-CAU-XX-XX-RP-V-0305)		Table 3, Sections 1.2.5, 2.3.2, 2.4, 2.10, 3.3, 3.4; Appendix 7.
								BAT RDF (5827-CAU-XX-XX-RP-V-0306)	Section 2.2.10, BAT 3
	The Site Condition Report information must include the SCR template. Environmental permitting: H5 Site condition report - GOV.UK	EA's SCR template.	SCR (5827-CAU-XX-XX-RP-V-0304)			Annex, Section 1.1.4			
3. Form C3/EWC codes	The EWC tables that you are applying for should be by activity type i.e. AR1, AR2 etc.	Updated Waste Lists	Supporting document (5827-CAU-XX-XX-RP-V-0301)	Appendix 3 and relevant sections in the report that refers to the waste list.					
			Activities & Operating techniques (5827-CAU-XX-XX-RP-V-0305)	Appendix 1 and relevant sections in the report that refers to the waste list.					
	You have included hazardous and non-hazardous codes in tables together, and tables cover different processes, e.g. biological treatment and leachate treatment. We cannot assess if the codes are suitable for a certain process when the EWC tables combine a variety of processes.	Updated Waste Lists	Same as above						
			The hazardous waste storage and bulking will take place under Section 5.6 and will have its own EWC table. The non-hazardous storage and bulking will take place as a waste operation and will have its own EWC table. The storage bulking activities for hazardous and non-hazardous have been provided in one table.	Same as above					

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4. Process Flow Diagrams	The process flow diagrams provided are too basic and do not include enough details to provide an overview of your processes, and you have not included process flows for all activities.	Updated Process Flow Diagrams	BAT Leachate (5827-CAU-XX-XX-RP-V-0307); BAT Inorganics (5827-CAU-XX-XX-RP-V-0308); Supporting Document BAT Inorganics (5827-CAU-XX-XX-RP-V-0301)	Figures 1 and 7 in BAT Leachate, Figures 1 to 12 BAT Inorganics, Appendix 6 SuppDoc report.
	Some process flow diagrams have been provided with more detail but on review do not include abatement process.	Same as above		
	The process flow submitted for biological treatment has more detail and states post nanofiltration liquid discharged to sewer/surface water. This discharge must be confirmed as sewer or surface water.	Same as above		
	You have not provided a detailed process flow for the metal precipitation process, the blending and mixing acids and alkalis, the treatment by drying sludges and solids or the precipitation of metals and inorganics.	Same as above		
5. Control and monitor emissions	Secondary containment has been referred to within the application with tanks stated as self-bunded, enclosed buildings with kerbing and containment being sufficient. Secondary containment is not sufficiently detailed with calculations showing containment provided meets CIRIA 736 or an equivalent standard.	Containment calculations to meet CIRIA 736 document provided by FCC	ERA (5827-CAU-XX-XX-RP-V-0302) BAT Inorganics (5827-CAU-XX-XX-RP-V-0308) BAT Leachate (5827-CAU-XX-XX-RP-V-0307) OpTech (5827-CAU-XX-XX-RP-V-0305)	Appendix 2, Tables 2, and 6. Appendix 5, BAT 4, BAT 19 Appendix 4, Section 2.8.15, BAT 4, BAT 19, Appendix 3, Section 2.8
	We are unclear if your proposals include containment for piping of chemical additions to processes, this has not been detailed.	The leak detection and repair plan, including the secondary containment calculation document also covers reagent containment, (as is the case for all of the activities) since these will be within bunded areas as per the different waste processing activities and inline with the relevant BAT.		
	You advised during our meeting that due to the building of the new site there may be changes to the final design for containment that you currently have. We discussed what would be needed for the permit to have a pre-operational condition for secondary containment. To add a condition like this we would need the surveys, calculations, final design and time scale. The site would not be able to operate until this condition has been met, and sufficient secondary containment is in place. There may be time and material charges involved in signing off this per operational condition.			
6. Abatement	You have not fully described your abatement systems or demonstrated how these will be effective or meet BAT.	Identification and selection of Emission Control equipment summary document - FCCE WTR provided	ERA (5827-CAU-XX-XX-RP-V-0302)	Appendix 5, Tables 2, 3, and 4.
			BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	Appendix 4, BAT 3, BAT 14.
			BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	Appendix 6, BAT 3, BAT 14.
			OpTech (5827-CAU-XX-XX-RP-V-0305)	Appendix 5, Section 3.3, 3.4.
			BAT RDF (5827-CAU-XX-XX-RP-V-0306)	BAT 14 referred to Appendix 4 on report .0308 for reference.
7. Accident Management Plan	You have not provided an updated accident management plan in line with guidance	Accident Management procedures provided	ERA (5827-CAU-XX-XX-RP-V-0302)	Appendix 4, Table 6
			OpTech (5827-CAU-XX-XX-RP-V-0305)	Appendix 4, Sections 2.10.13 and 2.10.14.
			BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	BAT 21 referred to Appendix 4 of OpTech .0305 for details on accident management procedures.
			BAT RDF (5827-CAU-XX-XX-RP-V-0306)	BAT 21 referred to Appendix 4 of OpTech .0305 for details on accident management procedures.
			BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	BAT 21 referred to Appendix 4 of OpTech .0305 for details on accident management procedures.
			EMS Summary (5827-CAU-XX-XX-RP-V-0303)	Section 2.2.4
8. Leak detection and repair plan	You have not provided a leak detection and repair plan or indicated if one is in place (leak detection and repair). See section 11.9 of the guidance Biological waste treatment: appropriate measures for permitted facilities - 11. Emissions control - Guidance - GOV.UK . Provide justification for not producing and LDAR Plan	Stated guidance does not require Leak detection and repair plan/protocol for activities proposed, however a summary document provided as requested.	OMP (5827-CAU-XX-XX-RP-V-0310)	Appendix 2, Table 4.
			BAT Leachate (5827-CAU-XX-XX-RP-V-0307)	Appendix 7, BAT 5, BAT 19
			ERA (5827-CAU-XX-XX-RP-V-0302)	Appendix 3, Table 6
			BAT Inorganics (5827-CAU-XX-XX-RP-V-0308)	Appendix 3, BAT 5, BAT 19.
9. Form C6	You have stated there are no new emissions to air, however your application clearly identifies new emission points including four emission to air points from activated carbon filters and wet scrubbers and two emission points from enclosed buildings with negative air pressure carbon filter and carbon filter with scrubber.	Drawing ref. 5827-CAU-XX-XX-DR-V-1805; Drawing ref. 5827-CAU-XX-XX-DR-V-1807; Drawing ref. 5827-CAU-XX-XX-DR-V-1808; Emissions point table containing grid references.		
	You have not demonstrated that abatement and techniques proposed will meet relevant BAT or that the abatement is suitable for the techniques being carried out ie, these buildings include multiple treatment types such as shredding and blending.	Identification and selection of Emission Control equipment summary document - FCCE WTR provided	Same as documents referred in 6. Abatement above.	

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	You have advised that some enclosed tanks have some form of vent or pressure relief valve. These have not been included on your emission point plan; you will need to provide the national grid references for all emission points. It is also unclear how diffuse emissions to air from vents will meet BAT 14.	Updated Sampling and Emissions Point Plan (1805) for the site, with grid references; separate sampling and emissions point plans produced for WP04 (1807), WP06 (1808) and WP07(1809) by Caulmert; Identification and selection of Emission Control equipment summary document - FCCCE WTR provided	BAT Inorganics (5827-CAU-XX-XX-RP-V-0308) BAT Leachate (5827-CAU-XX-XX-RP-V-0307) OMP (5827-CAU-XX-XX-RP-V-0310) OpTech (5827-CAU-XX-XX-RP-V-0305) Supporting document (5827-CAU-XX-XX-RP-V-0301)	BAT 14, BAT 3, Appendices 2 and 4, Tables 1 and 2, Sections 3.1, 3.2, 3.3, and 3.4.6. Appendices 3 and 6, Section 2.2.4, Table 1, BAT 3, BAT 14. Appendix 3, Table 3, Sections 1.5.3, 3.7. Appendix 7, Sections 1.2.5, 2.3, 2.4, 2.10.3, Table 3. Appendix 9, Sections 3.5.2, 3.14, 5.3, 5.22, 5.23.
10. Emissions to Water	Your application proposes two discharges to water from the site, one indirect emission to water to River Aire via sewer and one directly to River Aire. NGR's have not been provided for discharge and monitoring points for these discharges. There are no emissions inventory for these discharges, as required BAT3.	Updated H1 Assessment report; Emissions Point Table contain the NGRs for these locations.	BAT Leachate (5827-CAU-XX-XX-RP-V-0307) Supporting document (5827-CAU-XX-XX-RP-V-0301)	Updated the following BAT in this report: BAT 3, BAT 19, and BAT 21. Sections 2.3.3, 2.4.8, 2.4.9, Appendix 3 and Table 2 Sections 3.14, 5.17, 5.22, Appendix 9.
	The report also uses background data for River Aire and River Don. You must be able to demonstrate in your application why the background data chosen for use in the application is applicable.	H1 Assessment report		
	The H1 tool used for both assessments has not been provided.	This is provided as an Appendix to the H1 Assessment report.		
	You have not provided an assessment in line with H1 annex D2	Included in H1 Assessment report.		
11. Removal of Activities	Your application requests the removal of two activities identified as Section 5.3 A(1)(a)(v) recovery by distillation of oil or solvent and Section 5.3 A(1)(a)(iii) disposal or recovery of hazardous waste exceeding 10T. We note that these activities include Directly Associated Activities (DAA's), please note that these will also be removed as part of the surrender unless you specifically request to keep them and explain how they are relevant to your operations.			
	You have advised that you wish to retain 2 boilers, however it is unclear which boilers and emission points you wish to keep, or how they will still be DAAs to the installation activities you will permit. Please note that if these are not DAA's they will need to be surrendered and applied for separately under Medium Combustion Plant Directive (MCPD).		SuppDoc (5827-CAU-XX-XX-RP-V-0301)	Sections 3.5, 3.14.4, 6.1.3, 6.1.4
			ERA (5827-CAU-XX-XX-RP-V-0301)	Sections 1.1.5, 1.4.2,
			NMP (5827-CAU-XX-XX-RP-V-0311)	Sections 1.2.2, 1.2.3.
			OMP (5827-CAU-XX-XX-RP-V-0310)	Sections 1.5.2, 1.5.3
	The current permit has DAA for treatment of site surface water and process water in an aerobic effluent treatment plant before discharge to sewer. It is unclear what is happening with this plant. <i>Note if in aggregation with other section 5.4 activities this exceeds the activity threshold and this will be an installation activity .</i>		OpTech (5827-CAU-XX-XX-RP-V-0305)	Sections 1.2.4, 1.2.5, Table 1
			SuppDoc - 5827-CAU-XX-XX-RP-V-0301;	Sections 3.5.2, 6.1.4.
			OpTech - 5827-CAU-XX-XX-RP-V-0305;	Sections 1.2.5, Table 1
		ERA (5827-CAU-XX-XX-RP-V-0301)	Sections 1.1.5, 1.4.2.	
	NMP (5827-CAU-XX-XX-RP-V-0311)	Section 1.2.3		
	OMP (5827-CAU-XX-XX-RP-V-0310)	Section 1.5.3		
12. Waste Operations	There are two waste operations on the current permit for storage and bulking non-hazardous wastes. Provide a separate EWC table for wastes you wish to, retain remove or add for the waste operation	Updated Waste Lists	Waste list included as appendices in SuppDoc and OpTech reports.	
13. Noise Impact Assessment	You have not model files to accompany your noise impact assessment and noise management plan. The model files are required as part of the application.	Noise Assessment and model files	NMP (5827-CAU-XX-XX-RP-V-0311)	Section 3.1 for summary of noise assessment.