

Dewsbury RFI issued: 4/09/24

Due: 18/09/2024

Submitted: 18/09/2024

Application Fee

Application fee

- £13,984 application fee for - S5.4 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.

This payment has been raised previously, no further payment needed for this.

- £3,965 at 50% - (1.16.12) - Temporary storage of cake (subject to confirmation and information provided in relation to this activity below)

This payment is not required, please see response to Question 1 and 2 below.

- £793 @ 10% - (1.16.12) - Dewatering of cake (what will not undergo anaerobic digestion, note this is based on a waste activity and not an installation activity.)

This payment is not required, please see response to Question 1 and 2 below.

- £2,379 (1.16.14) - Physical Chemical treatment of waste - Minor variation to remove existing Phyto conditioning activities but not the land

This payment has been raised with reference PSCYORKSWI027. Please see screen shot below for total additional fee of £4,399. This is currently going through the YW approvals process.

Additional Assessments (see below for further details)

- Odour management plan - a fixed charge of £1,246

This payment has been raised previously, no further payment needed for this.

- Habitats assessment - a fixed charge of £779

This payment has been raised with reference PSCYORKSWI027. Please see screen shot below for total additional fee of £4,399. This is currently going through the YW approvals process.

- Emission Management Plan - a fixed charge of £1,241

This payment has been raised with reference PSCYORKSWI027. Please see screen shot below for total additional fee of £4,399. This is currently going through the YW approvals process.

SAP Ariba Buying 🔔¹ 🛒 ? HM

Dewsbury Mitchell Laithes STF Additional IED Permit Application Costs Total Cost **£4,399.00** GBP [Withdraw](#) [Edit](#) ...

Request details / PR292173

Write your comment... Share with supplier [Add](#)

HM Hazel Morgan
17 September 2024 [Shared with supplier](#)
EA Contact Liz Topping. IED permit reference EPR/VP3730GB
[Remove](#)

HM Hazel Morgan
17 September 2024 [Shared with supplier](#)
Additional application charges associated with Dewsbury Mitchell Laithes STF charges as follows...
- Phys chem treatment of waste, to remove sludge phyto conditioning permit. Charge is £2,379 based on EA table of charges 1.16.14.
- Habitats assessment of £779. in line with EA table of charges 1.19.2
- Emissions management plan of £1,241. In line with EA table of charges 1.19.5
Please use reference PSCYORKSWI027
[Remove](#)

1) Temporary storage of cake

You have identified within your application that “greater volumes may be stored on site in emergency/abnormal conditions such as following processing problems at other YW sites.” And provided table ‘C3: 1b-2 – Types of waste accepted – Imported wastes for dewatering/storage only (prior to recovery)’. If you are importing cake for temporary storage and transfer of site without wastes being processed through the AD this will be a separate waste activity. In order to progress this activity, you will need to provide the information identified within our application process, this includes but is not limited to the below. (Please note it is your responsibility to ensure that information is provided in line with our requirements, failure to provide this will mean that we will not be able to progress these elements of your application.)

a) Payment in line with guidance ‘When and how you are charged’ and above summary.

At this stage, and as part of the IED application, we will not be pursuing the waste transfer station. This payment has not been raised. The OMP has been updated to state the cake pad is for digested cake storage only. Reference to undigested sludge has been removed from table 11 of the OMP.

b) Non-technical summary, and process flow including how you will keep this activity separate from your installations activity

N/A

c) Assessment against Non-hazardous and inert waste: appropriate measures for permitted facilities

N/A

d) Completion of relevant forms – B4 new bespoke waste operation

N/A

e) Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan etc.
N/A
2) Dewatering of cake that will not undergo AD You have identified within your application table 'C3: 1b-2 – Types of waste accepted – Imported wastes for dewatering/storage only (prior to recovery)'. If you are importing waste for dewatering only and transfer of site without wastes being processed through the AD this will be a separate waste or installation activity (depending on the tonnage and process). In order to progress this activity as a waste activity you will need to provide the information identified within our application process, this includes but is not limited to the below. (Please note it is your responsibility to ensure that information is provided in line with our requirements, failure to provide this will mean that we will not be able to progress these elements of your application.)
a) Payment in line with guidance 'When and how you are charged' and above summary.
At this stage, and as part of the IED application, we will not be pursuing the waste transfer station. This payment has not been raised. The OMP has been updated to state the cake pad is for digested cake storage only. Reference to undigested sludge has been removed from table 11 of the OMP.
b) Non-technical summary, and process flow including how you will keep this activity separate from your installations activity
N/A
c) Assessment against Non-hazardous and inert waste: appropriate measures for permitted facilities
N/A
d) Completion of relevant forms – B4 new bespoke waste operation
N/A
e) Updating and inclusion of this activity in all relevant management plans such as the Odour management plan, accident management plan, residue management plan etc.
N/A
3) Surrender of existing permitted activities You have requested the surrender of your existing permitted activities but not the associated land, however you have not provided payment, or any information on how these activities have been decommissioned and if the environmental risk removed. In order for us to progress this you will need to provide the following.
a) A non-technical summary and evidence to demonstrate that all risks have been removed from the activities being surrendered

There is no surrender taking place at Mitchell Laithes. YW currently operates two permits at this STF. An existing CHP permit (VP 3730GB) and a sludge conditioning permit (LP3492SG).

We are varying the existing CHP permit and updating it to include anaerobic digestion and DAAs.

We will not be consolidating the conditioning permit.

We've taken the decision not to incorporate the conditioning permit as it would mean a much wider installation boundary was covered and we've not got the ability to surrender the surplus land at the moment.

YW accepts that this will leave the conditioning permit as an active, if non-operational, permit. For clarity there are no activities that are carried out under the conditioning permit and there is no legacy sludge phyto conditioned material still in situ. In time, and as funds allow next AMP, we will look to surrender the conditioning permit. We will continue with annual waste returns for this site but they will in effect be a nil return.

b) Pay the fee in line with section 5.1 of guidance

There is no surrender and therefore no additional fee has been raised.

4) Bioaerosol Risk assessment

You have stated that you have carried out "quantitative bioaerosol monitoring in accordance with Technical Guidance Note M9 'Environmental Monitoring of Bioaerosols at Regulated Facilities'" and determined that "Mitchell Laithes STF installation is not a significant source of bioaerosols" and "the risk assessment will be updated upon receipt of the monitoring data". You need to send us a Bioaerosol Risk Assessment that is specific to your site. This should meet the requirements of our M9 Position Statement and be specific to the facility you are applying to permit. This must show that the process and/or abatement measures adequately prevent, or where this is not possible, significantly reduce the risk of bioaerosols release. It must show that the resulting activity will be unlikely to expose the nearest sensitive receptor to elevated concentrations of bio-aerosols. The detail and level of risk assessment must be site specific, process, and location dependent. You must have measures and process controls in place to control and minimise the risks identified. These must be clearly stated in your assessment.

Provide a Bioaerosol Risk assessment in line with M9 guidance.

Please see Dewsbury STF Bioaerosol Site Specific Risk Assessment V001.

5) Accident Management Plan

You have submitted a risk assessment under section Q 6-8 of your submission in relation to accidents, however this does not meet the requirement set out in our guidance

Provide a standalone accident management plan that meets the requirements of the above guidance.

Please see Dewsbury STF Accident Management Plan V001.

6) Emission Points

On review of your 'Principal Emission Points Rev.B' this does not include your location of your pressure release valves (PRV).

Update plan 'Principal Emission Points Rev.B' to include the location of the PRVs and provide the National Grid references for each PRV.

Figure 3. Principal Emission Points. Rev.C (2 of 2) has been updated to include the location of the PRV's. For information the NGR's are:

Asset	NGR
A9 Digester PRV	SE 25975 19985
A10 Digester PRV	SE 26004 19981
All Gas holder PRV	SE 25976 20019

7) Secondary Containment

Document 'Mitchell Laithes Secondary Containment Assessment' does not include spill modelling following the implementation of the proposed high level solution.

Confirm that as part of any final detailed design, spill modelling will be undertaken to demonstrate that the proposed solution will contain spills in line with CIRIA C736.

I confirm that detailed design and solutions will contain spills in line with CIRIA C736.

8) Waste water emission during storm over flow conditions at the WwTW

Routine emissions to the WwTW from the installation will be controlled via monitored emission limits as an indirect discharge (as defined in the Waste Treatment BREF). However, as WwTW periodically discharge sewage during storm conditions, it's possible that wastewater from the installation could bypass the WwTW treatment processes and be emitted as a direct discharge to water. It's not clear from the application how this abnormal situation will be prevented. Operators of environmental permits cannot emit wastewaters directly to surface waters without detailed risk assessment. You must therefore have procedures to prevent the discharge of wastewater from the installation from bypassing the WwTW treatment processes directly to surface water during storm overflow conditions.

Note, this information can be included as an addendum to your accident management plans as part of BAT conclusion 21, Emissions from accidents and incidents.

<p>a) Provide written procedures which describes the site's contingency arrangements to prevent digestate and effluent being discharged off site while the WwTW are in storm conditions.</p>
<p>All STF return liquors from the installation boundary are downstream of the storm overflow point. There is no ability for return liquors to enter the storm tank or 6x channel and discharge during storm conditions.</p>
<p>b) Provide a description of the buffer storage proposals to control or h emission to the event of storm overflow conditions at the WwTW.</p>
<p>This is not required as there is no route for return liquors to discharge via site overflows.</p>
<p>c) Should any contingency arrangements use storage tanks to act as a buffer, provide evidence that demonstrates the waste waters or digestates can be held in this storage during the period of storm overflows.</p>
<p>N/A.</p>
<p>9) Emissions to air from odour control units</p> <p>Under BREF guidance BAT conclusion 8, BAT is to monitor channeled emission to air at agreed frequencies and standards. On review of your submission, we can see no mention of parameters for the 'Treatment of water-based liquid waste' (TVOC and HCl), or evidence that TVOC and HCl have not been identified as relevant in the waste gas stream. Your activity includes prior to the AD process (the biological treatment of waste) the thickening and dewatering process which is a directly associated activity of the AD process. The odour control units identified serve this directly associated activity. The BAT AELs are appropriate for the activity defined under the BREF as 'Treatment of water-based liquid waste'. The BREF provides examples of wastes that would be considered as water-based liquid wastes. These include wastes under the category '19 08 wastes from waste water treatment plants not otherwise specified'. The treatment of this waste in the dewatering and thickening stage and the subsequent emissions to air from connected abatement could be subject to the BAT AELs specified within BAT conclusion 8.</p>
<p>a) Confirm that you will characterise emissions from the odour control units in line with BAT 3 to demonstrate if TVOC and HCl are present in the waste gas stream.</p>
<p>YW will characterise emissions from the OCUs to demonstrate if TVOC and HCl are present in the waste gas stream.</p>
<p>b) Confirm that if TVOC and HCl are identified as relevant in the waste gas streams that you will monitor these emissions in line with BAT requirements.</p>
<p>If TVOC and or HCl are identified, YW will monitor in line with BAT requirements.</p>
<p>10) ISO Certificate</p> <p>On review of your ISO 14001 certificate this has expired.</p> <p>Provide an updated ISO 14001 certificate.</p>
<p>Please see ISO 14001 certificate.</p>