

Naburn WwTW Tankered Trade Imports – Waste Permit Application
EPR/KB3804UG/A001: Request for Further Information Response

Environment Agency Question	Yorkshire Water Response
<p>Part A – Please complete Appendix 1</p>	<p>Please see updated Form Part A in document ref ‘Naburn WwTW Environmental Permit Application – RFI update’</p>
<p>Part B2 - Question 3B – please complete this question in full. We require the name of the proposed TCM in this section. You also need to complete the table at the top of page 6 of Part B2 with the environmental permit number/s and site address for all other waste activities that the proposed technically competent manager provides technical competence for, including permits held by other operators. You also need to tick ‘I have enclosed a copy of the relevant current continuing (CC) competence certificate/s’. Please also submit the certificate for the original WAMITAB award for Kevin Spink, the application supporting documents currently only contain the CC certificate.</p>	<p>Please see:</p> <ul style="list-style-type: none"> - Updated Form Part B2 see document ref ‘Naburn WwTW Environmental Permit Application – RFI update’ - Document ref – ‘TCM Additional Sites’ - Document ref – ‘Original WAMITAB Award’
<p>Part B2 - Question 3 – please submit a summary of your management system. The summary must cover all the points in ‘Develop a management system: environmental permits’ at https://www.gov.uk/guidance/develop-a-management-system-environmental-permits. Please see the part B2 guidance (attached) for further information.</p>	<p>I have reviewed the EMS guidance accompanying part B2. YW has covered the majority of the elements required via the description of our company wide EMS which is accredited to ISO14001 as well as the pre acceptance check and waste acceptance procedures.</p> <p>Our application also included references to the storage of waste to allow YW the flexibility to install a storage tank at a late date. I can see that has led to some confusion because in actual fact there is currently no storage of trade waste on site. With that in mind the supporting information and procedures are quite straightforward because the environmental risk from this import activity is low.</p> <p>EMS items not addressed in the original application are answered below:</p> <ul style="list-style-type: none"> • The provision of drainage plans. A drainage plan for the site is now provided (see document ref ‘Naburn drainage plan’). Please note there is no risk of pollution to land or water because the tanker import point is on impermeable surface with drainage back to the head of the WwTW. • We do not have an infrastructure plan. YW believes it would be excessive to expect

	<p>these plans considering the low complexity of the activity and the fact that nothing new is being built on site.</p> <p>Our waste pre-acceptance and waste acceptance procedures will be updated to state:</p> <ul style="list-style-type: none"> • The Waste Services Team review their procedures every 2 years. • Record keeping is by an electronic monitoring system called JRP which records pH, volume and dry solids. There is an electronic recording system for duty of care waste transfer notes. Records are kept on the JRP portal indefinitely. • In the event of an odour complaint from a receptor, YW will investigate (as outlined in the OMP) and either divert the load to a less sensitive site (with no odour sensitive receptors) or stop accepting the load from the customer if necessary. • YW have robust acceptance checks in place. However, in the unlikely event of an unapproved load being discharged to the WwTW a full investigation would be instigated and the company in question would be taken off YW's list of approved companies.
<p>Part B2 - Question 5a – The proposed waste operation boundary plan shows a very small area to be included in the permit boundary. Please note that the permitted area must allow sufficient room for tanker delivery, it must include all areas used for storage of wastes and delivery and deposit of waste to the head of the works. The boundary must include all tanks that may contain waste as well as any tanks for dual use. If it does not cover these areas, please revise the operation boundary plan.</p>	<p>Please see document reference 'Naburn – edited permit boundary'. The new boundary allows sufficient space for tanker delivery. There is no storage of imported tankered trade waste at Naburn WwTW.</p>
<p>Part B2 - Question 5B - Provide the relevant sections of a site condition/baseline report. See the attached guidance for further information</p>	<p>Please see document ref '6 – Updated environmental risk assessment' Appendix 2.</p> <p>Please note, in accordance with H5 guidance section 4.0 – 10.0 have been left blank and will be updated as and when required.</p>
<p>Part B2 - Question 5C – Please reference your non-technical summary in this section</p>	<p>Please see updated Form Part B2 'Naburn WwTW Environmental Permit Application – RFI update'</p>

<p>Part B2 - Question 6 Environmental Risk Assessment – There is a Site of Scientific Interest (SSSI), Local Wildlife Site and protected species within the screening distance of the proposed waste site. Update your risk assessment to include how risks to these features will be mitigated.</p>	<p>Please see document ref '6 – Updated environmental risk assessment'. Yellow highlighted areas note updated text. This outlines that there is no risk to habitats and protected species from the permitted activity.</p>
<p>Part B2 - Appendix 2 - Complete the name and date of birth information for technical ability.</p>	<p>Please see updated Form Part B2 in document ref 'Naburn WwTW Environmental Permit Application – RFI update'</p>
<p>Part B4 - Question 1</p> <p>The list of wastes to be accepted includes codes ending in 99, therefore you must provide more information and a full description of the waste in the document, (for example, detailing the source, nature and composition of the waste). Where you only want to receive specific wastes within a waste code you can provide further details of the waste you want to receive. Where a waste is dual coded you should use both codes for the waste. I have received notification from the area officer that you wish to remove two waste types from the list of wastes to be accepted (16 05 05 gases in pressurised containers and 20 03 01 mixed municipal waste). Please also submit a revised list of waste types to be accepted.</p>	<p>Please see document ref 'Final EWC list May 22'</p>
<p>Part B4 - Question 3</p> <ul style="list-style-type: none"> Table 3a: When an application is made for storage, transfer or treatment of non-hazardous and/or inert wastes this also must be dealt with in a specific way. Therefore in Table 3a you will need to reference the non-hazardous and inert waste appropriate measures guidance https://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities You will need to confirm that you will fulfil the measures in the guide or provide alternative measures. 	<p>Please see document ref '6 – Updated environmental risk assessment' Appendix 1.</p>
<p>Part B4 – Question 3 - You may also need to reference the chemical waste appropriate measures in this section. Please view the Chemical waste: appropriate measures for permitted facilities guidance available at https://www.gov.uk/guidance/chemical-waste-appropriate-measures-for-permitted-facilities and reference them in Table 3a if necessary</p>	<p>YW were advised by Phil Dixon from NPS that the tankered import activity is physical treatment of waste 1.16.12. Please see document ref 'Camberley email from Phil Dixon'. Therefore, there is no requirement to produce table 3A for chemical waste appropriate measures.</p>

<p>Part B4 - Provide site infrastructure plans and location plans</p>	<p>A location plan has been provided. We have not provided an infrastructure plan as YW believes it would be excessive to expect these plans considering the low complexity of the activity and the fact that nothing new is being built on site.</p>
<p>Part B4 - Table 3B – Submit an Odour Management Plan specific to the waste operation to be permitted – in the case of this application the OMP should cover storage of wastes and delivery and deposit of waste to the head of the works. Please reference your OMP in this table. The OMP should meet the requirements of our H4 Guidance (https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management). The charge for our assessment of your plan is not included in your baseline application charge. You will therefore need to make an additional payment of £1,246.</p>	<p>Yorkshire Water believe that odour is very unlikely to arise from this waste activity. YW has produced an OMP in line with H4 guidance for the sections relevant to this activity. Please see document ref 'Naburn OMP'.</p> <p>Additional payment made on 11.05.2021 reference PSCAPPYORKSWI005</p>
<p>Part F1 - Fee – The baseline fee is correct; however, the charge activity reference should be 1.16.14 (Physical and chemical treatment of waste).</p>	<p>Please see updated Form Part F1 in document ref 'Naburn WwTW Environmental Permit Application – RFI update'.</p> <p>Activity reference has been updated to 1.16.12 – Physical Treatment of waste. Document ref 'Camberley email from Phil Dixon' outlines the advice given from the Environment Agency that activity reference 1.16.12 is the most appropriate for import of waste to the inlet. Yorkshire Water are following this guidance.</p>
<p>Part F1 - Question 2 – please complete this question</p>	<p>Please see updated Form Part F1 in document ref 'Naburn WwTW Environmental Permit Application – RFI update'.</p> <p>The additional £2,025 payment has been made on 11.05.2022 reference number PSCAPPYORKSWI005</p>
<p>Part F1 - Question 5 Declaration – you have submitted a letter of authorisation signed by Nevil Muncaster. Mr Muncaster is not listed on Companies House for this company and therefore we cannot accept the letter as confirmation that Adele Burns can sign on behalf of the company. Please revise the declaration so that it is completed by a listed person or submit a new letter signed by an appropriate person.</p>	<p>Please see document ref 'Email communications with Environment Agency 18.10.21' and associated attachments 'Delegated Authority Environmental Permits AB SM and HM 100821' and 'YWS_Company_directors (30.06.2021)'.</p> <p>This information was provided to Permitting Support Advisor Jodie Wharmsby in October 2021.</p>
<p>Other - Your application requires an assessment under the Habitats Regulations. The charge for this assessment is not included in your baseline application charge. You will therefore need to make an additional payment of £779.</p>	<p>Additional payment has been made on 11.05.2022 reference number PSCAPPYORKSWI005.</p>