









DCWW Queensferry Sludge Treatment Centre Permit Application – Not Duly Made response V2

NRW reference:	PAN-014554	Date:	17/06/2022
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Approved by:	Shannon Stone		

Table 1: Not Duly Made response

Question	Response
1. Complete Appendix 5 WW to provide document reference to their pre-acceptance procedures that comply with section 2.1.1-2.1.3 of SGN 5.06, and which are used to assess a waste enquiry	Appendix 5 has been completed.  Queensferry Form Part B3.pdf
2. Complete Appendix 5 Layout plan to include: - areas and structures for separately storing types of waste which may be dangerous to store together) - and capacity of waste storage areas and structures - where each treatment plant is based	Appendix 5 has been completed (question 1) The capacities of the waste storage areas and structures are included in section 1.2 of the Main Supporting Document v3 (document reference Section 3 of B14411-123532-ZZ-XX-NN-ZA-DI1035 Queensferry Permit Application Main Supporting Document v3).  B14411-123532-ZZ-XX-NN-ZA-DI1035 Ql

Question	Response
<ul style="list-style-type: none"> - the main items at each plant - and process flow diagrams for the treatment plant 	<p>The site layout plans B14411-123532-XX-XX-DR-AC-PN8202 P03 - Site Layout Plan (Emissions) and B14411-123532-XX-XX-DR-AD-PR8401 - IED Queensferry - Block Flow Diagram</p> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="text-align: center;">  <p>B14411-123532-XX-XX-DR-AC-PN8202 P03</p> </div> <div style="text-align: center;">  <p>B14411-123532-XX-XX-DR-AD-PR8401 BI</p> </div> </div>
<p>3. Complete Appendix 5 Summary of the treatment activities carried out on the installation (in line with section 2.1.4, 2.1.5 and 2.1.15 of the SGN 5.06)</p>	<p>Appendix 5 has been completed (question 1)</p> <p>See Section 3 of the Main Supporting Document (question 2)</p>
<p>4. Technical Competency Please provide evidence of registration / contract with the certification body (SGS).</p>	<p>The information below is in addition to that provided in section 5.2 of the Main Supporting Document, previously supplied.</p> <p>DCWW are discussions with SGS, the external auditing body who will be overseeing the CMS accreditation and implementation for DCWW.</p> <p>Attached is the proposal received on 06/06/2022 from SGS. Although it is not yet a signed contract as yet, in order to provide the NRW with evidence of our commitment to a CMS, it is all DCWW have. DCWW have also drawn up policies, objectives and targets to confirm commitment to implementing a CMS.</p> <p>Discussions with SGS identify that SGS are aiming to audit DCWW's CMS in September 2022.</p> <p>DCWW held a meeting with SGS on 08/06/22 to review the proposal.</p> <p>The proposal lists four AAD facilities that currently have permits, but not Eign and Queensferry, however, it does make reference to stage 2 as extensions in the scope which include these two currently unpermitted sites. DCWW have asked SGS to include all six sites in the scope and are currently waiting for SGS to update the scope. DCWW have confirmed with SGS that they are happy with the fee and the proposal as a whole but are awaiting SGS to provide a confirmation response. It is anticipated that DCWW will gain an accredited CMS by the end of October 2022 for all six identified sites.</p>

Question	Response
	<p>A copy of the proposal (which makes reference to, the requested to be included, stage 2) is attached, along with the DCWW CMS Policy and objectives and targets are also attached as evidence of their commitment to implementing a CMS.</p> <div data-bbox="880 320 936 384"></div> <p data-bbox="808 389 1010 440">Technical Competence Manager</p>
<p>5. Accident Management Plan Submit an AMP in full that includes details of DSEAR Zoning plan(s)</p>	<p>As previously stated, the guidance does not explicitly state that a full AMP is required to be provided with the application. NRW's justification for requesting an AMP in full is so that it can be viewed to confirm it complies with BAT 21. This approach is contradictory because there is not requirement to provide the EMS in full to confirm compliance with BAT 1. An AMP would form part of this EMS (Page 22 – How to comply with your environmental permit) A summary of DCWW AMP has been included in the Main Supporting Document. See Section 5.4.2 in the Main Supporting Document (see item 2).</p> <p>The key procedures that DCWW have in relation to emergency procedures applicable to the site are provided and these will be review and updated, where appropriate, to ensure they remain compliant with the permit on an annual basis, when there are any significant changes to the site or in light of an environmental incident. Details of the PEXA (DSEAR) zoning plans have also been included as Appendix B.</p> <div data-bbox="880 898 936 962"></div> <p data-bbox="808 967 1010 1018">Queensferry AMP (draft) June 2022.pdf</p> <div data-bbox="1093 898 1149 962"></div> <p data-bbox="1025 967 1227 1018">EN (2) 01 Environmental Aspect</p> <div data-bbox="1294 898 1350 962"></div> <p data-bbox="1256 967 1391 1018">MSDS for raw materials.pdf</p>
<p>6. Risk assessments & management plans Provide an air emissions risk assessment in line with the following guidance: Air emissions risk assessment for your environmental permit - GOV.UK (www.gov.uk)</p>	<p>We are currently running the H1 screening tool and we will provide the outcome and an interpretative report for determination by CoP 24th June 2022.</p>
<p>7. Risk assessments & management plans Provide a noise impact assessment in line with BS4142:2014 and the following guidance: Noise and vibration management: environmental permits - GOV.UK (www.gov.uk).</p>	<p>The potential for noise impacts have been considered in the Environmental Risk Assessment. See Section 3.3 in the Environment Risk Assessment. Please disregard any reference to the noise measurement survey undertaken in October 2017 by Environmental Compliance Ltd (ECL), as this is specific to occupational noise rather than environmental noise.</p>

Question	Response
	<p>In consulting a Mott MacDonald Principal Acoustic Engineer it has been brought to DCWW's attention that baseline surveys conducted, by Mott MacDonald in 2018 in line with BS4142:2014, for a neighbouring highways project (the A494 River Dee Bridge Improvement) included two positions that represent the closest sensitive receptors to the STC (1. Dundas Street and Queens Street and 2. The Traveller Site, Queensferry).</p> <p>This baseline survey has shown that a major source of noise affecting the noise climate in the area of these two sensitive receptors was identified as road traffic on the A494 road. Other contributors were identified, but these did not include sources attributable to the operation of the STC. The noise impact of the STC is, therefore, considered likely to be sufficiently minor and will have no material impact on the community. It is therefore considered that a noise impact assessment for the site will provide the same conclusions and is therefore not considered necessary.</p> <p>Further discussions with the Acoustic Engineer also concludes that given the location of other noise emitting activities adjacent to the site (railway and dual carriageway), and that the site is not undergoing any changes to its existing operations, equipment or vehicle movements, a separate noise impact assessment is not required or provide any additional benefit, and the data provided by the baseline survey carried out for the A494 scheme is sufficient to justify the STC does not impact on the closest sensitive receptors.</p> <p>The updated ERA v3 is attached below. Please refer to section 3.3.</p> <div data-bbox="880 890 936 954" data-label="Image"> </div> <p>B14411-123532-ZZ- XX-AS-NA-RI1037 IEC</p>
<p>8. Provide a noise management plan in line with BAT requirements and the following guidance: Noise and vibration management: environmental permits - GOV.UK (www.gov.uk).</p>	<p>Guidance suggests that a noise and vibration management plan is only required where a noise assessment identifies there is a risk to sensitive receptors. Justification to not provide a noise and vibration management plan is provided in Section 3.3 of the Environmental Risk Assessment and in response to question 7 above.</p>
<p>9. Provide a quantitative odour impact assessment (odour modelling) in line with H4 Odour Management guidance: How to comply (publishing.service.gov.uk)</p>	<p>Olfasense has visited the site to conduct a quantitative odour impact assessment and are in the process of producing an updated report for the STC. They have confirmed that this report will be updated and finalised by 29th July. The current OIA is attached.</p>

Question**Response**

DCWW20B_05_DRAF
T - Odour Report.pdf

The odour management plan is also being updated in conjunction with this impact assessment. Both the OIA and the OMP will be submitted to NRW week ending 5th August.

An email to confirm this is attached.



FW Queensferry OIA
confirmation.msg

10. Risk assessments & management plans

Based on outcome of assessment above and if applicable provide a revised odour management plan in line with BAT requirements

DCWW, with support from Olfasense, will then update the odour management plan (OMP), based on the outcome of this assessment, in accordance with the H4 guidance.

In addition, DCWW have requested Olfasense to support site operation teams to undertake regular checks on the OCU's for the first 6months, so they understand what checks and NRW reporting is required in the future. In the interim, DCWW will continue to follow the existing odour management plan and odour impact assessment previously submitted with the application. The management of the odour risks at the Site is also addressed in the November 2020 Odour Management Risk Assessment and OMP. The current OMP provides mitigation measures to be followed by all staff to ensure normal operation does not result in odours leaving the STC boundary.



Queensferry OMP
311020.pdf