

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To:

Dŵr Cymru Cyfyngedig
Dwr Cymru Welsh Water Linea
Fortran Road
St. Mellons
Cardiff
Wales
CF3 0LT

Application number: PAN-018778 (EPR/ZP3032KQ)

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated 29/09/2022. The information requested should be sent to the following address by **15/03/2023**.

Information should be sent to:

Wales Permitting Centre
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Lucinda Hall	01/03/2023

Authorised on behalf of Natural Resources Wales

Schedule

The notice specifies what you need to send and when you must send it by. If we do not receive it by the date set out in the notice, then we may treat your application as having been withdrawn.

1. Proposed Daily & Annual Throughput Capacity

Confirm your daily and annual throughput capacity in liquid tonnes.

Note. You have stated within your application that the activity capacity of the AD plant will be 109 tonnes of dry solids per day or 39,785 tonnes of dry solids per annum. NRW require proposed throughput capacity tonnages (daily and annual) to be provided as calculated using our RGN02 guidance (Appendix 2):

Biological Treatment of Waste (Section 5.3 and 5.4) As the biological treatment of waste usually takes place over more than one day, the physical daily capacity can be calculated by dividing the maximum quantity of waste the biological treatment activity could treat at any one time divided by the minimum residence time. For an anaerobic digestion facility with a number of biological treatment tanks in series, this will be the total working capacity of the treatment tanks (includes secondary digester tanks) Environment Agency RGN 2 Appendices 1 and 2 3 divided by the minimum hydraulic retention time (HRT) from the first to the last tank. If the tanks are in parallel, then treat as separate processes and calculate using the individual minimum HRTs applied to each tank, and then add the individual totals together.

2. Site Layout Plan

Submit an updated site layout plan with the location of all point source emissions and storage vessels identified on the plan. This should include details of any channelled vents or releases to air from all storage tanks including silos, feed tanks and output storage tanks.

Note. Your application states that your site will have a point source emission to sewer of condensate and liquid effluent post de-watering stage, however your site plan does not include these point source emissions from the site.

Your site plan should also identify point source emissions from all emergency pressure relief valves and/or vacuum relief valves (PRVs) across the site as well as identify the location of all raw material storage tanks and storage areas/containers, including (but not limited to) storage vessels for Diesel, Flocculant, Sulphuric acid, Oils, Sodium Chloride, Activated Carbon, Antifreeze, Disinfectant, Anti-foam, Polymer and Grease.

3. Process Flow Diagram (PFD) / Process Description

Submit an updated process description for the AD site, with contains further detail for all stages of the treatment process.

Note. The process flow diagrams, and process description submitted with your application did not provide sufficient detail of all stages within your process, including details of:

- a) How condensate is captured and sent either for re-circulation back into the plant or to sewer (as applicable).
- b) De-watering stage indicates solid / liquid separation however there is no further detail on the diagram describing where the 70% liquid output fraction is sent.

- c) How effluent from the 'water treatment and conditioning' stage of the process is captured and where the effluent flows to.
- d) Provide further details of the 'disinfection' stage and the treatment process involved, including details and quantities of any raw materials used and any by-products generated as a result of this process (The process flow diagram submitted with your application indicates water effluent is 'disinfected' prior to re-circulation back into the front end of the process).
- e) The process description and list of activities does not currently include the siloxane removal system and filter.
- f) Further detailed description is required for each of the odour control units(OCU) (the biofilter & carbon filter OCU as well as the sulphuric acid scrubber OCU).

4. Proposed Waste Types / EWCs

Provide further information on your proposed operating techniques, waste acceptance procedures and specified pre-acceptance criteria for accepting wastes under the following proposed European Waste Codes, and provide justification for their suitability for treatment at the AD plant:

- a) 19 05 03 Sewage sludge composted with biodegradable non-wastes only
- b) 19 12 11 Other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
- c) 19 12 12 Wastes from mechanical treatment of wastes other than those mentioned in 19 12 11

5. Raw Materials

Provide an updated raw materials list which includes descriptions and tonnages of all raw materials to be utilised, included (but not limited to) Sulphuric Acid, Sodium Chloride, Activated Carbon, Antifreeze, Polymer and Disinfectant.

Note. Table 6.6 within your main supporting document does not list all of the raw materials which are stated elsewhere in your application.

6. Secondary Containment of Raw Materials

Provide:

- a) a risk assessment of all primary, secondary, and tertiary (where applicable) containment measures for all raw materials to be stored on site.
- b) Provide details of the construction standards for this containment measures.

Note. No details have been provided of primary and secondary containment measures for raw materials to be stored on site.

7. BAT Assessment BAT

a. Odour Management Plan

Submit to NRW a copy of the Odour Management Plan as referenced within your BAT assessment.

Note. The updated BAT Assessment submitted to NRW on 11/01/2023 listed evidence against BAT Conclusions 13, 14, 33 and 34 of an existing Odour Management Plan, however this document has not been submitted with the application.

b. No.24 Residues Management Plan

Submit a copy of the Residues Management Plan in order to demonstrate compliance against BAT24 and BAT1 XII.

c. No.38- Process Monitoring

Submit a methodology which identifies each of the process parameters listed within BAT Conclusion No.38 and the proposed frequency and techniques in place to record the data. Where a process parameter cannot be monitored justification should be provided and/or a suitable alternative proposed. The methodology should include trigger levels for each of the parameters with associated procedures in place if trigger levels are exceeded.

Note. The updated BAT Assessment submitted to NRW on 11/01/2023 did not contain sufficient details to demonstrate compliance against BAT Conclusion No.38.

8. Odour Impact Assessment – Met Data Files

Submit all meteorological data files (sfc, pfl & .atz files) used in the Odour Impact Assessment Modelling (DCWW22E_EPR_04_Final_Afan).

Note. The report submitted does not include details of assumptions / parameters used in processing of the met data, or the met data files themselves.

9. CIRIA Risk Assessment

Submit drawing reference No. B14411-123532-XX-XX-DR-CA-CI9001-P01 which is referenced within the CIRIA Assessment Summary document.