

Risk assessment on sewer discharge:

Provide a copy of the H1 assessment for relevant hazardous substances to sewer (as required by improvement condition 4 of the permit). If one has not been completed, provide confirmation that one has not been completed.

IC4 -

- *IC 4: - Phase 1 screening test report for priority hazardous pollutants and any other relevant priority hazardous substances discharged to sewer. For any substance which is not screened out by the screening tests, further modelling should be undertaken.*

IC4 was due for completion February 2022. We have updated NRW site officer Lewis Evans periodically on the progress we are making and agreed extensions to the improvement condition.

Summary of progress Of IC4

We have had issues collecting samples for analysis for the completion of IC4. The site does not discharge daily, and trade effluent discharge volumes are low and intermittent. This has made sampling and measuring volume difficult.

The trade effluent comprises of washdown water from the process hall and spent potable water from the odour control unit (ODC). This effluent is captured through drains on site and stored in a 'dilution' storage tank. This effluent is used within the process. It is added to the processed food waste to ensure it is a suitable consistency to go through the AD process.

Any excess effluent that is not used in the process can overflow from the dilution tank to sewer – and is classed as trade effluent.

Overflow of the effluent only occurs when the process is down or at times during the weekend.

Dwr Cymru/Welsh Water (DCWW) class the trade effluent discharge from site as low risk and schedule six monthly sampling, they also have difficulty sampling due to no flow or little flow.

The NRW site officer has advised we need twelve samples to complete the risk assessment.

We have had difficulty obtaining the number of samples due to the intermittent and low volume of the discharge. We have also had issues with obtaining complete analysis from the lab, particularly with the organic analysis. We have set up a contract with another lab to try and expedite this.

We have also discussed with consultants to provide an interim assessment and/or to complete the assessment in steps, as we find certain analysis, such as metals, we obtain the results more easily and have proposed to complete this by May 2025.

The amendment to table S3.2 sewer discharge and monitoring in the permit is to correct the Emission Point (discharge) and Monitoring Point (sample point) as they were incorrect at permit issue. The correction reflects the monitoring points that are

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referenced in the Trade effluent consent and Letter of authorisation from DCWW and that we use on site to obtain samples.

We highlighted these errors to the permitting officer during the Permit Breft review, but were advised to include in the next variation as the Permit Breft review did not include corrections to the permit.

The trade effluent discharge consent has not change since issue and we are not requesting any change regarding the permit requirements other than to correct the emission/sample points.