

Dan Sandrof Consulting



14 September 2021

Dear Dan,

**Proposal to mothball the acid scrubber at the Wrexham Recycling Park Phase 2 MBT facility (Environmental Permit reference BB3436RA)**

Further to your letter dated 1st August 2021 and FCC Environment's request to mothball the acid scrubber unit within the air treatment system on a 2 year trial basis, NRW Officers visited site on the 8 September 2021 to view the scrubber unit in situ and understand more about the proposal.

FCC Environment (FCC) have stated that the scrubber unit was effectively over engineered when the plant was being designed. As such the justification behind the installation and continued use of the acid scrubber element of the filter is no longer representative. The amount of organic material within the process is less than anticipated at the design stage, therefore, the amount of gaseous ammonia generated is minimal and the need for the acid element of the scrubber unit redundant. FCC state that they would retain the humidification stage of the scrubber as this removes dust and maximises moisture content in the air flow to the biofilter.

NRW are in agreement that the acid scrubber element of the air treatment system can be mothballed on a 2 year trial basis subject to the following conditions:

- Monitoring to be undertaken quarterly for gaseous ammonia during the first year once the acid scrubber unit is 'turned off'. This will be reviewed at the end of Year 1 and agreement reached for any subsequent sampling required in Year 2.
- Monitoring results to be submitted to NRW within 28 days of receipt, alongside any waste composition analysis undertaken during that quarter. NRW understand that regular waste composition analysis is already undertaken and therefore there is no additional burden to the Operator.
- NRW will review the information quarterly, raise any queries and provide feedback. NRW may request that the acid scrubber unit be reinstated if concerns are raised over emissions.

(We note that FCC have stated that should there be 'a significant rise in the organic content of the waste inputs, combined with elevated levels of gaseous ammonia entering the abatement system and a significant rise in the odour/TVOC emissions from the abatement system' that they will look to re-commission the acid dosing system).

- All component parts of the existing unit are to remain in situ and be subject to existing maintenance checks to ensure the unit can be reinstated if required (unless the permit is varied or as otherwise agreed in writing by NRW).
- Weekly logs should include checks to ensure any changes to the biofilter media are noted and escalated immediately. These logs may be inspected by NRW officers. FCC should also ensure that NRW officers are kept abreast of any developments or changes on site linked to the scrubber unit.
- FCC should ensure that their EMS, Odour Management Plan and Operating Techniques documents are updated to reflect the changes requested.

As discussed on site, it was agreed that the acid scrubber unit would not be mothballed until after the biofilter media had been replaced and settled, this was due to be completed before the end of the year. Please ensure you keep NRW informed of when the acid scrubber unit is mothballed and the additional sampling has commenced.

If you have any queries on the above please do not hesitate to contact me.

Yours sincerely,



Rebecca Harwood  
Senior Officer – Industry & Waste Regulation

Tel: 03000 65 4209

Direct e-mail: [rebecca.harwood@cyfoethnaturiolcymru.gov.uk](mailto:rebecca.harwood@cyfoethnaturiolcymru.gov.uk)

Address: Chester Road, Buckley, Flintshire CH7 3AJ

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English

cc. Garry Smith - PFI General Manager, FCC Environment