Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for The Old Saw Mill (TWTC) operated by William Gilder Limited.

The permit number is EPR/QP3933EM/A001

The application was duly made on 08/11/13

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

The Old Sawmill, Toddington Waste Treatment Centre (TWTC) is located 1km to the north of the village of Toddington, Gloucestershire and is operated by William Gilder Limited.

The purpose of this plant is to treat industrial and domestic sewerage and leachate effluent is delivered to the installation by road tanker (from the company's septic tank and package treatment plant emptying business). On receipt waste is pumped into one of three 2,873m^3 covered holding tanks. Solids are removed and sent for offsite spreading or disposal. Liquid effluents are processed using biological and physical-chemical treatment systems. When the treated effluent meets appropriate standards and criteria, it is discharged into a controlled watercourse.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation

Key issues of the decision

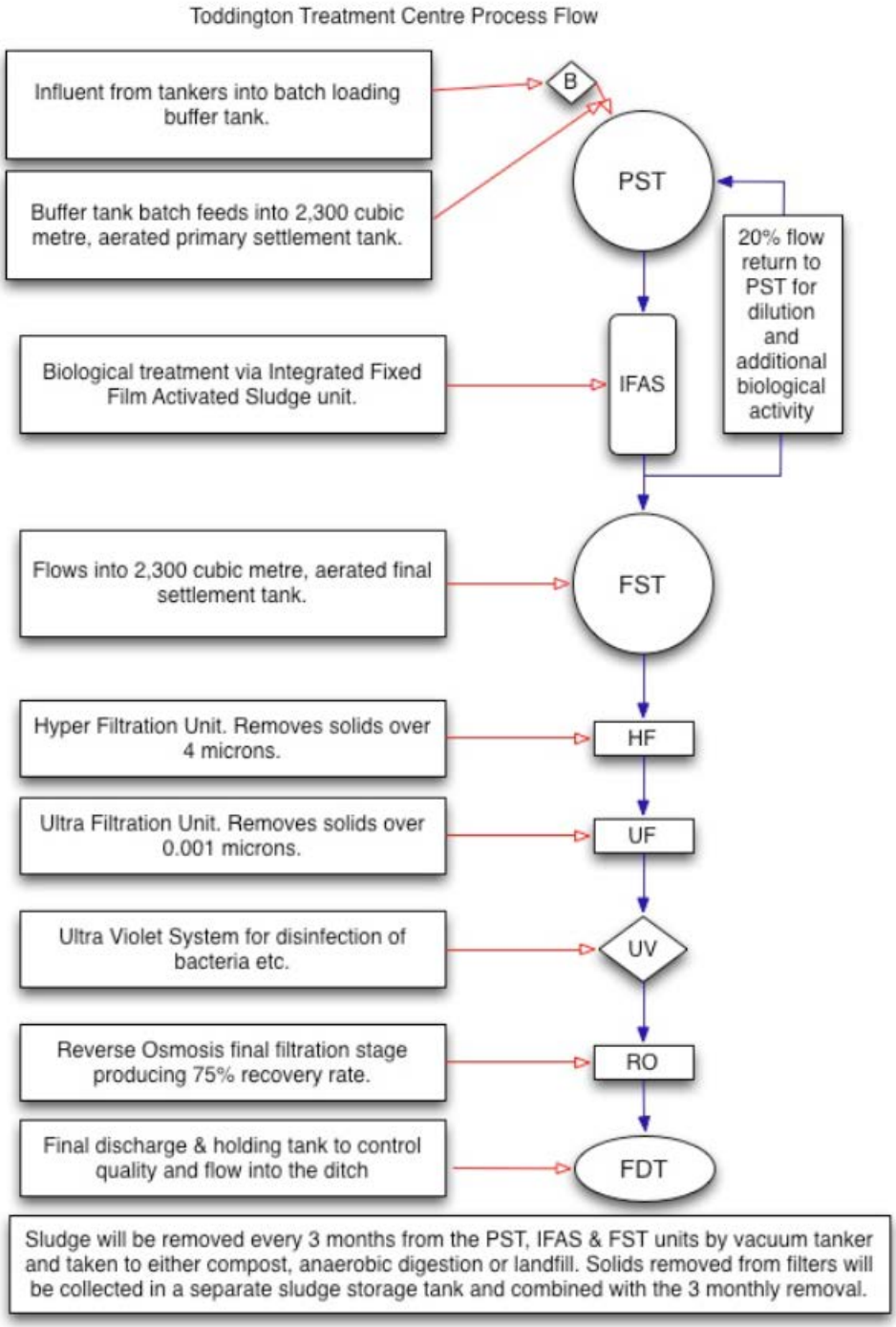
The key issues associated with this permit determination are:

- Effluent treatment and impact to controlled waters
- Waste acceptance
- Storage and secondary containment

- Odour management plan
- Site Condition and Land/Groundwater protection
- Accident management and control
- Environmental Risk Assessment

Effluent treatment technology

The effluent process is shown the in the flow chart below for clarity.



Industrial and domestic sewerage and leachate effluent is delivered to the installation by road tanker (from the company's septic tank and package treatment plant emptying business) and pumped into one of three 2,873m3 slurry covered holding tanks. Effluents will then be pumped into one of two

integrated fixed activation sludge (IFAS) bioreactors and circulated within the slurry tanks and bioreactors. Bacteria is continually injected into the process to digest the solids and reduce the BOD and biodegradable contaminants. Following biological treatment the wastewater will be further treated by a series of progressive filtration that will ensure the final discharge meets the required criteria set within the permit.

The whole process is located within the secondary containment bund for the site as shown in the site diagrams provided with the application. Sludge will be removed quarterly by vacuum tanker and disposed offsite. Solids removed from filters will be transferred into tanks A/B/C and combined with the quarterly sludge removal.

Impact of discharge to controlled waters

The site is not within a source protection zone or sewered area and the nearest river is 730 meters from the site boundary, as a direct result we have approved the discharge to a seasonably dry ditch leading into a controlled water course, Carrant Brook.

We have assessed the impact of the proposed effluent discharge in accordance with our Operational Instruction, OI 51_12 "Water Quality Planning: No deterioration and the Water Framework Directive." The Water Framework Directive (WFD) requires that member states *"implement the necessary measures to prevent deterioration of the status of all water bodies…." (Article 4.1).* All practicable action must be taken to prevent the deterioration in the status of all water bodies in England and Wales. While the permitting of a discharge into a water body will cause some localised deterioration, under WFD the deterioration from one status class to a lower one is not permitted. We use two tests to decide if discharges to surface waters are acceptable. A discharge is generally acceptable if:

1. it does not cause deterioration in quality of the water body receiving the discharge. We will assess discharges using the 'no deterioration' test if: applying to increase currently permitted discharges, and
2. the receiving water body meets its target quality standards.

No deterioration

Our aim is to issue permits that prevent or minimise any deterioration in the quality of the water bodies that could otherwise occur as a result of the discharge. We must also be sure the proposed discharges do not make it impossible to achieve any target standards not currently being met (such as the WFD Status Objective).

We refer to this as 'no deterioration' and our ideal is for no increase in the planned pollutant load discharged to the water body. Where this is not possible, we will limit any within-class deterioration as far as possible.
We must maintain the WFD status of water bodies (as reported in the December 2009 River Basin Management Plans approved by Ministers). This may exceptionally require action beyond the requirement for no increase in the permitted pollutant load to the water body.

If the control measures necessary to achieve 'no deterioration' are not practical or cost-effective, we may either refuse the permit or request the operator to use technically feasible and cost effective measures.

Target standards
When we are seeking improvement in water quality, our objective is to make sure that the permits we issue meet the uses, water quality objectives, environmental quality standards and design standards applicable to the receiving water. There include the Water Framework Status Objectives.

Water Quality Assessment
The operator will discharge treated effluent to the top of the Washbourne brook catchment. The upper reaches of this watercourse are known to be dry during dry years. A water quality survey was completed on the Carrant Brook in 2011 by the Environment Agency. The brook has a Water Framework categorisation of moderate with phosphate being rated as poor. The Washbourne Brook flows into the Carrant Brook. This water body has an overall classification of moderate. Phosphates are again classified as poor and macrophytes as moderate. The ditch is dry during the summer months, therefore a zero dilution factor must be used when considering 'worse case' for modelling purposes. The operator will monitor the effluent quality and biological activity to ensure the ETP is running effectively, efficiently and discharge is within the consents of the permit.

The programme 'Mass Balance Calc' (Monte Carlo) was used to determine acceptable effluent quality limits would be acceptable for the effluent discharge. To carry out this assessment, flow data and water quality data for the receiving watercourse is required, as well as effluent flow data and effluent quality data and the targets that need to be met.

In accordance with our 'No deterioration' policy (outlined above and explained in detail in our guidance H1 Annex E Surface Water Discharges (complex) v2.1 December 2011 and Operational Instruction 50_12), Water Quality Planning: no deterioration and the Water Framework Directive, the following permit limits are proposed:

- Total suspended solids 10mg/l
- Biological oxygen demand 10mg/l
- Phosphate 0.12 mg/l
- pH 6-9
- ammonia 0.5mg/l
- Cadmium 1.5µg/l
- Chromium 4.7µg/l
- Copper 28 µg/l
- Nickel 20 µg/l
- Lead 7.2 µg/l
- Zinc 125 µg/l
- Volume 400m^3/day
- Temperature 28°C

Limits for BOD, Suspended Solids and pH reflect the BAT for the sector. Tighter limits have been set for Phosphate and Ammonia, the WFD limit for phosphate and ammonia to meet good status is 0.12mg/l and 0.5mg/l respectively in the Carrant Brook, we have matched these limits due to the zero dilution factor for this discharge. The tighter limits are necessary to protect the receiving watercourse. Additionally we have also set limits for heavy metals as described above due to the nature of the wastes entering the facility. These reflect limits for other nearby discharges into the Carrant Brook. They have been set in accordance with Environment Agency guidance on implementing the no deterioration requirements of the Water Framework Directive.

The principle of "going beyond BAT" is supported in Regulatory Guidance Note 4 (RGN4) on 'Setting standards for environmental protection' which states that "If meeting a European environmental quality standard (EQS) requires a stricter ELV than indicated on the basis of BAT (or an overriding requirement to prevent certain emissions (e.g. hazardous substances to groundwater as defined in the Water Framework and Groundwater Directives), the regulator must impose that ELV or consider refusing the permit altogether." In this case the overriding requirement is compliance with the Water Framework Directive.

Waste Pre-acceptance

Wastes will undergo laboratory tests to ensure compatibility with the site ETP system, this is essential to ensure that wastes delivered to the site will not be toxic to the bacteria on which the biological system and plant treatment efficiency depends. The test will monitor active biomass population, stress levels and suspended solids activity. If the biostress indicator is above the acceptable load value of 30, the waste will require remediation before it can be accepted at the site. The waste will be sampled prior to delivery on the site and post delivery, to ensure the pre-test was representative of the waste actually delivered.

Waste storage and bund calculations

There will be three main steel cylindrical storage tanks (tanks 1,2 and 3) with a holding capacity of 2,873m^3 each. There are additional tanks for the effluent treatment plant (tank X for biological settlement, 6&7 for aeration spares, 4/5 back up discharge tanks and Y reception tank) and spare tanks A/B/C, the operator has calculated the bund capacity taking into consideration the total volume of all tanks at the site. The bund capacity has been calculated by the operator to be 3,583m^3, which is over 110% of the largest tank, and which is the larger volume when compared with 25% of the total holding capacity. The calculations take into consideration the total area available for spillage, removing capacity for other pieces of equipment and tanks located within the bunded area. The bund is constructed of non-permeable reinforced concrete base and walls connected with sealed metal frames.

The bund will be periodically emptied of rainwater and reprocessed through the effluent treatment plant system. The separated solids within the catch pits will be transferred into tanks A/B/C to await periodic offsite disposal. The bulk

liquid storage tanks will be fitted with a high level 3 zone alarm system, There will also be a level probe within the bund. The alarms will sound and send text alerts to operatives.

We have visited the site and inspected the integrity of the bunds, some deficiencies were identified and the operator was advised to review maintenance and make improvements; to complete sealing all joins and repair a hole in the bund wall, upon completion of the works we are satisfied the bund will meet our requirements as described in our guidance document 'How to comply with your environmental permit'. We have incorporated a pre-operational condition into the permit (PO1) to ensure the bunding is maintained to a suitable standard prior to operations commencing at the installation.

Odour Management Plan (OMP)

An OMP was submitted by the operator with the permit application, dated 19th April 2013. The OMP has been assessed against our guidance (H4 Odour Management). The OMP considers sources, releases and impacts, the operator has identified 16 nearby sensitive receptors. The following operating techniques will be incorporated by the operator to mitigate potential odour release:

- The majority of waste treatment will be completed as a closed system (including the transition of waste from tankers)
- Waste contained in the large open tanks will be covered by a surface layer of expanded clay which will act as a physical barrier and a filtration media to odour.
- Any residue left inside the waste tanks will be washed down after emptying or when required
- A trained operative will be in attendance during all waste transfers and processing
- Any spillage immediately cleaned up and washed down
- The screening unit and waste receptacles will remain closed, with the exception of maintenance
- Waste screenings will be contained in a cassette bagging system which enables bags to be removed whilst maintaining a seal from the feed pipe for the next batch.
- Olfactory odour monitoring will be carried out at the site perimeter and sensitive receptors to ensure odour management controls are effective and where necessary additional control measures will be auctioned
- Dewatering catch pits will be enclosed, and the majority of wastes emptied onto the dewatering pads will be silts (containing 95% soil), which is odourless.
- Where odour is detected by the operator a odour reducing chemical (EccoMate) will be used to help mitigate odour.
- Venting during sludge removal, the operators tankers have carbon filters attached, however third party companies do not have carbon filters as standard. The operator has identified a vapour recovery unit which could be installed as a part of the de-sludging process if odour

becomes an issue on the site. The implementation of this will be monitored under IC2

We are satisfied the operator proposes to employ the appropriate methods, including monitoring and contingencies to control and minimise odour, prevent unacceptable odour at all times and to reduce the risk of odour releasing incidents or accidents by anticipating them and planning accordingly. We have included a improvement condition into the permit (IC2) to ensure the operator will review the impact of odour and OMP once activities have commenced at the installation to reassess predictions of odour versus actual odour levels/sources.

Site Condition Report (SCR)

Surface Water

The centre drainage channel in the yard collects rainwater which is treated through a three stage interceptor discharging into the stream. The 3-stage interceptor consists of three, 1,500 gallon subsurface in-line chambers. There is a guillotine valve located between the final chamber and the discharge point allowing the operator in an accident/emergency situation to completely isolate the interceptor from the discharge point.

There is additionally a emergency shut off valve fitted to the outlet point so in a emergency spillage situation it can be contained at the site.

The operator has provided a SCR with the application, dated 15th February 2013, further information was received on the 5th of November showing the result of groundwater and soil samples taken at the facility. We have reviewed the SCR. The site is underlain by Charmouth Mudstone bedrock. The River Isbourne is located 730m to the East of the site, flowing south. There is a ditch immediately alongside the east, south and western boundaries of the site, which flows towards the south-west and eventually into the Carrant Brook at Beckford. The site is within 10m of this ditch however tanks are fitted with high level alarms and within appropriate secondary containment bunding. The surface water discharge is fitted with a 3 stage interceptor and emergency shut off valve, the effluent discharge is managed throughout the ETP process by analysis and a final holding tank controls quality and flow prior to disposal. The site is located at approximately 63m elevation. The closes licensed abstractions are 900m to the north west from Springs and 1km to the south-east from River Isbourne, these are not considered to be at risk from the activities taking place at the site. No private supply boreholes have been identified, the closest residential dwelling is 250m from the site boundary.

A baseline investigation has been completed by the operator for soil and groundwater quality, however it is noted that boreholes and trial pits were undertaken in the area of the proposed tanks and not across the whole site. The former land use is for storage of haulage vehicles, trailers, cabins and pre-cast concrete products and there was a former saw mill nearby to the north. There were no above or below ground fuel tanks. The baseline survey showed two locations with high TPH concentrations: WS2 (208mg/kg) and TP1 (62mg/kg). Exceedances of water quality standards were reported for ammoniacal nitrogen, chloride and sulphate in the groundwater samples.

Surface water from the ditch was found to have elevated ammonia on one occasion as well as 2,6-Dinitrotoluene in one sample.

The wetland area to be created in the south west corner of the site has potential risk of pollution from run-off. The centre drainage channel in the yard collects low risk surface water which is treated through a three stage interceptor prior to discharge into the stream, and all waste handling/storage areas are located in the main bund, therefore minimising this risk. High risk areas (within the bunded storage area) will be emptied of surface water by the operators tankers and transferred into one of the waste holding tanks to be processed in the water treatment plant at the site.

The site is extensively surfaced with non-permeable concrete, there is little likelihood of future pollution from the material being handled at the site. Although baseline data is not totally comprehensive we accept that it forms a reasonable basis to characterise the existing soil and groundwater condition at the site.

Accident Management Plan (AMP)
The operator has submitted an AMP with the permit application, dated 17th May 2013. The plan takes consideration to events or failures which could harm the environment, assessing how they are likely to happen, the potential environmental consequences and the actions required to both minimise the potential causes and consequences of an accident. We consider the identified risk and preventative measures/controls suitable for the activities taking place at the site.

Environmental Risk Assessment
Noise and Vibration
The nearest residential receptor is 250m from the site boundary across a main road (B4078) with mature trees blocking the direct line of sight. Orchard Trading Estate is located in-between the site and the majority of nearby residential properties.
The operator has identified the main potential noise sources as vehicle movement and blower operation for the biological ETP. The blowers are enclosed and have a noise emission rating of 66.5dBA, pumps will be enclosed where possible and will only be in activation for short periods of time when the waste is being transferred from tanker to storage tanks and vice-versa. Site speed limits will be enforced excessive horn use prohibited and internal site roads maintained, the planning consent restricts operational house, 7am to 7pm Monday to Saturday. Those machines that are able to be shutdown will be switched off when not in use. We are satisfied with the techniques proposed by the operator to mitigate and reduce noise emissions where possible. Due to the proximity of the site to an industrial area and residential properties we do not consider the risk of noise nuisance to be high and that it can be managed under condition 3.5.1 of the Permit.

Dust
The waste accepted at the site will be in a liquid, slurry or sludge form and therefore will not present a dust hazard. Transfer of this waste will be

generally within an enclosed system. The only waste to be exposed to the air is the waste for dewatering, and thus its nature will be wet and not pose a significant risk of dust.

Bioaerosols
The waste imported to the site will have the potential to be biodegradable and therefore facilitate microbial growth. The conditions whereby the waste material releases airborne micro-organisms in the form of bioaerosols, which could dry out and form a dust if agitated to become atomised in a spray are unlikely at the site. Waste transfer will be enclosed and wastes stored will not be unduly disturbed or agitated.

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation	The consultation responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility A plan is included in the permit and the operator is	✓

Aspect considered	Justification / Detail	Criteria met Yes
	required to carry on the permitted activities within the site boundary.	
Planning permission	We are satisfied that planning permission is in place and is appropriate for the relevant waste operation(s) applied for. A copy of the planning permission has been submitted with the application which allows 3 slurry tanks for the bulking up of slurry waste prior to further processing, re-use, treatment or transfer.	✓
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED– guidance and templates (H5). See the key issues section for further information.	✓
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a nature conservation area and habitat . A full assessment of the application and its potential to affect the sites/habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the site/habitat. The operator has completed a ecological overview for the installation constructing of an ecological assessment and proposal of enhancements to be completed by the operator during construction and operation. The operator has assessed the ecological importance of the site as low, however has proposed operating techniques and ecological enhancements to mitigate impacts further. The proposed development will only directly impact on existing areas of hard standing. The treated effluent discharge is not in relevant hydraulic continuity with an conservation site. We are satisfied that the operator has fully considered the ecological impact of the site, and enhancements proposed are suitable for the setting. Formal consultation has been carried out with Natural England. The consultation responses (Annex 2) were	✓

Aspect considered	Justification / Detail	Criteria met Yes
	taken into account in the permitting decision. A appendix 11 document was sent to Natural England for information only.	
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment all emissions may be categorised as environmentally insignificant. The operator's risk assessment, odour and noise management plans are satisfactory. There are no emissions to air or land. We have carried out a risk assessment on discharges to controlled waters, see below section and key issues for further information.	✓
Environmental risk	We have carried out a risk assessment on behalf of the operator. We have modelled the impact of the discharge to controlled waters from the effluent treatment plant. The ditch the operator will be discharging into is seasonably dry, therefore to model impact at 'worse case' we have incorporated a zero dilution factor. Limits have been set where necessary to protect the receiving watercourse. See key issues section for further information.	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. • How to comply with your environmental permit • S5.06 Guidance for the recovery and disposal of hazardous and non-hazardous waste • S5.03 Guidance for the treatment of landfill leachate. The operator will implement the following operating techniques at the facility. • All waste will be carried by registered waste carriers • During non-operational hours the security gates will be locked • Adequate training will be provided for staff	✓

Aspect considered	Justification / Detail	Criteria met Yes
	• Waste transfer notes will be used for inputs and outputs to and from the facility • A preventative maintenance plan has been provided stating the following will be completed by the operators: o Daily checks of all pipes, overflows, bunds etc, clear of blockages and rainwater o Daily check on the primary settlement tank (PST) storage, showing 3 days capacity available o 6 monthly checks on tanks, valves, pumps, pipes are all watertight and secure o 6 monthly checks on locks, drains, fences, ladders, gates, handrails are all fault free and fully operational o Monthly checks will be completed on specific pieces of equipment (e.g. blower pressure checks) • Pre acceptance procedures are in place to assess the suitability of wastes accepted • All liquid storage tanks are secondary bunded to the larger of 110% of the largest tank or 25% of the total volume • High level alarms will be located on storage tanks • Spill kits will be available at the loading locations • Interceptors on surface water discharge to controlled waters • Emergency shut off valve on surface water discharges • Water quality monitoring on effluent discharge to controlled waters The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions, and ELVs deliver compliance with BAT-AELs.	
The permit conditions		
Waste types	We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.	✓

Aspect considered	Justification / Detail	Criteria met Yes
	We are satisfied that the operator can accept these wastes for the following reasons: they are non-hazardous wastes and appropriate for the effluent treatment systems proposed. Two mirror waste entries were applied for: • 16 07 08 waste containing oil. • 19 07 02 landfill leachate containing dangerous substances. The operator is limited to non-hazardous waste acceptance within the permit, hazardous entries of the wastes as specified above will not be permitted for acceptance at the facility. We made these decisions with respect to waste types in accordance with S5.06 Guidance for the recovery and disposal of hazardous and non-hazardous waste and S5.03 Guidance for the treatment of landfill leachate.	
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions. Upon a previous pre-application site inspection completed by the Environment Agency, concerns were raised to the operator on the integrity of the bunds. A pre-operational condition has been written into the permit to prevent commencement of operations prior to Agency approval of the bund integrity arrangements at the installation.	✓
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions. We have imposed improvement conditions to ensure that: ➢ appropriate management systems and management structures are in place and that sufficient financial, technical and manpower resources are available to the operator to ensure compliance with all the permit conditions. ➢ the appropriate measures are in place to prevent pollution from odour. The following improvement conditions have been written into the permit:	✓

Aspect considered	Justification / Detail	Criteria met Yes
	IC1 The Operator must provide the appropriate level of competence for a 'high risk operation' in order to demonstrate technical competence as agreed with the Environment Agency. Certificates shall be submitted to the Environment Agency for approval. We have identified the suitable training to the operator as WAMITAB Level 4 training on non-hazardous sludge – biological, chemical and physical treatment. **IC2** Submit a written revised odour management plan to the Environment Agency for approval. The plan must contain a review of the odour associated with the operations at the installation and the measures to comply with the requirements of condition 3.4.1. The plan must contain dates for implementation of individual measures if appropriate. You must implement the plan as approved, and from the date stipulated by the Environment Agency.	
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques table in the permit.	✓
Emission limits	We have decided that emission limits should be set for the parameters listed in the permit. We have set limits for discharge to watercourse stated within table S3.1 of the permit. Limits have been set for suspended solids, biological oxygen demand, and pH in line with our guidance. A daily discharge limit has been set for 400m^3 per day as requested by the operator. We have imposed numeric limits because either a relevant environmental quality or operational standard requires this. We have imposed a stricter emission limit in respect of phosphate, ammonia and heavy metal emissions to controlled water, because it is considered that the numeric limits described below will prevent significant deterioration of receiving waters. See the key issues section for further information	✓

Aspect considered	Justification / Detail	Criteria met Yes
Monitoring	We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.	✓
Reporting	We have specified reporting in the permit.	✓
Operator Competence		
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence. The operator holds a ISO14001 accredited environmental management system, a copy of the certificate was sent with the application.	✓
Technical competence	Technical competency is required for activities permitted. The operator is a member of an agreed scheme. The operator has appointed a technically competent person (Mark Passmore), the operator has provided a copy of the Environmental Permitting Operators Certificate (EPOC) awarded by the Chartered Institute of Wastes Management. The competent person will be required to complete Level 4 Non-Hazardous Sludge – Biological, Chemical and Physical Treatment within the grace period of 12 months under improvement condition IC1.	✓
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.	✓

Annex 2: Consultation responses

Summary of responses to consultation and the way in which we have taken these into account in the determination process.

Response received from
Natural England (response received 15/12/13)
Brief summary of issues raised
The site is 5km from Dixton Wood Special Area of Conservation (SAC) and 10km from Bredon Hill SAC, both notified for the Violet Click Beetle. The sites are sensitive to air pollutants. The proposed waste treatment plant is too far away to impact on the designated sites. No comments from Appendix 11.
Summary of actions taken or show how this has been covered
No action required.

Response received from
Public Health England (response received 12/12/13)
Brief summary of issues raised
1. Basic Operation. We note that the plant will largely operate as a sealed system with imported liquid waste being held and pumped between sealed containers and that the combination of bunding, impervious services and interceptor tanks should be adequate to deal with spillages or accidental releases subject to good site management. 2. Odour. The submitted odour management plan and risk assessment are satisfactory. If a permit condition relating to odour at the site boundary being undetectable is to be included PHE would recommend that if possible the site boundary be that which is shown in red on the Toddington-discharge-point-model.pdf document accompanying the application. 3. Risks to Water. It is noted that the underlying strata is classified as non productive and consequently PHE accepts that there is unlikely to be any significant water abstraction. We would recommend however that the Environment Agency confirm the presence or absence of such supplies and ensures that any releases from the site (permitted or otherwise) are unlikely to have a detrimental impact on drinking water quality or water used for irrigation purposes. On the basis of the information accompanying this consultation, and on the assumption that similar conditions will be included in the permit, PHE is satisfied that the proposed permitted process should not pose a significant adverse risk to public health.
Summary of actions taken or show how this has been covered
Response sent 07/01/13 1. Basic operation – the operator has submitted operational procedures, an environmental risk assessment and a copy of the ISO14001 and ISO9001 management systems certificates to provide us with

confidence that good site management as you have suggested is in place.

2. Odour – we have incorporated an improvement condition into the permit to ensure the operator reviews the sources of odour and associated odour management plan after commissioning the plant to ensure odours were correctly identified at planning and continue to be effectively managed.
3. Risks to water – the operator has completed a search, the closes license abstractions are 900m to the north west from Springs and 1km to the south-east from River Isbourne, these are not considered to be a risk. We have additionally asked the operator to contact the local authority to determine whether any private boreholes are located within the vicinity of the site.

Response received from
HSE
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
n/a

Response received from
Local Planning Authority
Brief summary of issues raised
No response received.
Summary of actions taken or show how this has been covered
n/a

Response received from
Primary Care Trust
Brief summary of issues raised
No response received.
Summary of actions taken or show how this has been covered
n/a

Response received from
Animal Health
Brief summary of issues raised
No response received.
Summary of actions taken or show how this has been covered
n/a

Response received from
Food Standards Agency
Brief summary of issues raised
No response received
Summary of actions taken or show how this has been covered
n/a