

Permitting decisions

Variation

We have decided to grant the variation for Liverpool Wastewater Treatment Works Sludge Treatment Installation operated by United Utilities Water Limited

The variation number is EPR/HP3131LX/V008

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account.

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- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision checklist](#) to show how all relevant factors have been taken into account

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

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

Key issues of the decision

Air quality

This variation is to install two new biogas CHP engines and a new gas dehumidification clean up facility. As the facility is located in an Air Quality Management Area (AQMA) the operator, United Utilities Water Limited, were required to submit an Air Quality Assessment.

The objective of the assessment is to assess emissions to the atmosphere from the Liverpool WwTW to determine the potential impact of oxides of nitrogen (NO_x), carbon monoxide (CO), sulphur dioxide (SO₂) and total volatile organic compounds (TVOCs) emissions on local air quality and designated ecological receptors.

The assessment will also determine whether emissions to air from the new CHP engines would result in a significant increase in the predicted concentrations or contribute to an exceedance of an Air Quality Standard (AQS), Air Quality Objective (AQO) or Environmental Assessment Levels

The two new CHP engines will replace existing CHP engines on site, which together with the existing dual fuelled boilers will provide heat and power for the Liverpool Waste Water Treatment Works (WwTW). Emissions from the boilers are emitted through a combined single stack and emissions from the CHP engines through independent stacks for both the existing and proposed operations, though the locations of the CHP stacks will change.

The applicant concluded that for human receptors, emissions to air “were predicted to be below the AQOs at all sensitive human receptor and off site locations...” and that emissions “from the new CHP engines would not result in a significant increase in predicted pollutant concentrations”.

For ecological receptors, the applicant concludes that predicted impacts from NO_x and SO₂ at the nature conservation areas will either be insignificant, or there will be no exceedance of the Environmental Standards (ES). They also conclude that “The process contribution to acid and nutrient nitrogen deposition at protected conservation areas is predicted to be insignificant”.

Document Ref: Audit of air quality impact assessments - AQMAU – C1583-WD01

The Warrington Installations team in National Permitting Service (NPS) asked the Air Quality Modelling and Assessment Unit (AQMAU) to audit an air quality assessment.

Based on our check modelling we agree with United Utilities’ conclusions that the proposed variation is not likely to have a significant impact on the air quality at nearby human and ecological sensitive receptors. Our conclusions are based on the emissions parameters provided by the applicant, and are therefore dependent upon the stated emissions concentrations being achieved.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made..
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility including the discharge points</p> <p>The plan is included in the permit.</p>
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p>

Aspect considered	Decision
	We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.
Environmental risk assessment	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory.
Operating techniques	
General operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.
Permit conditions	
Updating permit conditions during consolidation	We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit(s).
Raw materials	We have specified limits and controls on the use of raw materials and fuels.
Monitoring	Monitoring has not changed as a result of this variation.
Emission limits	No emission limits have been added, amended or deleted as a result of this variation
Reporting	Reporting has not changed as a result of this variation This is detailed in Schedule 4 of the permit.
Operator competence	
Management system	There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Aspect considered	Decision
	<p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>