



For the Attention of:  
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**PERMIT REFERENCE NUMBER: PPC/A/1003157**  
**POLLUTION PREVENTION AND CONTROL (SCOTLAND) REGULATIONS 2012**  
**BALDOVE EFW FACILITY, FORTIES ROAD, DUNDEE, DD4 0NS**

Dear Tracey,

Thank you for sharing SEPA's response to the application to vary PPC/A/1003157 (submitted on 10<sup>th</sup> January 2020). Please find below responses to the comments on behalf of MVV Environment Baldovie Limited (MEB) (the Applicant).

The following documents are provided in support of this update to the application to vary PPC/A/1003157:

- PPC Application Forms A, C and F (updates from the 10<sup>th</sup> January 2020 submission shown in red text);
- Non-Technical Summary (NTS) (new document as part of this submission);
- Supporting Statement (new document as part of this submission);
- Updated Air Quality Assessment (AQA) (updated as part of this submission);
- Heat and Power Plan (H&PP) (updated as part of this submission);
- Updated Habitats Regulations Appraisal (HRA) (no change from the 10<sup>th</sup> January 2020 submission);
- Noise Assessment (no change from the 10<sup>th</sup> January 2020 submission);
- Emissions and Impact Assessment Report – H1 (updated as part of this submission);
- SEPA response to the EIA scoping opinion request (no change from the 10<sup>th</sup> January 2020 submission);

- DCC letter confirming valid planning application (no change from the 10<sup>th</sup> January 2020 submission);
- Sampling Plan; and
- Correspondence from Scottish Water confirming that they have capacity to take the trade effluent and domestic type effluent discharges from the two facilities operating in parallel (new documents as part of this submission).

**SEPA response, received 23 January 2020**

Comment:

*CI.1 There is no explanation of potential changes to the Permitted Activities on the Installation: if waste is no longer being pre-treated for incineration (Condition 1.1.3.2 - Part A Activity 5.4,(a)(ii)) this will be a change to Schedule 1 of the Permit, which must be clearly stated. All changes to proposed waste handling and tonnages (since the previous application) must be clarified and explained;*

*CI.2 The Variation is a request to operate both plant in parallel, requiring all the details of emissions and techniques relating to the two separate plants, and is not simply an administrative change. The request to change just Conditions 2.9.8 and 2.9.9 without reference to the above, and to numerous other Conditions that may require review and possible amendment needs to be acknowledged. A request to undertake the necessary changes to other relevant Conditions to reflect the requested changes should be made as part of this application. Explanations should be provided for e.g. increased resource use, waste volumes and residues, retention of current equipment such as CEMS etc, wherever relevant;*

Response:

A supporting statement has been prepared which provides further details of the proposed changes to the permitted activities. In addition, as discussed with SEPA on 29<sup>th</sup> January 2020, reference to varying specific Conditions has not been included in the supporting statement. All relevant information has been provided for SEPA to review which Conditions will require updating.

Comment:

*C2.4 The 'Supporting Statement' referred to cannot be located. Please clarify where the specific information has been provided, to confirm that this as a substantial variation, or submit an appropriate document. Many of the responses on form C do not direct SEPA to the specific areas of documentation where changes due to operating two plant in parallel are discussed, (eg within a section in the Supporting Statement) and this should be addressed, or explained on the application forms;*

Response:

A supporting statement has been provided which provides details on all supporting documentation.

Comment:

*C2.1/3.1 Reference is made to updated Air Quality Assessment (AQA), Habitats Regulations Appraisal (HRA) and Emissions and Impact Assessment Report (EIAR) documents. The AQA did not use appropriate background pollution concentrations for an urban environment for metals etc, and may not be representative of the likely resulting predicted air quality. This issue was raised*

*during the previous application. It cannot therefore be determined if all Air Quality objectives and limit values will be met during parallel operations. All related documents may also therefore need updating;*

Response:

The AQA has been updated following a UK-wide review of background monitoring sites from urban locations for heavy metals, dioxins and furans, taking the greatest average values over the past five years (or where data are available), as requested by SEPA. Justification for the acceptability of this data has also been provided.

All predicted environmental concentrations remain below the relevant standards, with the exception of hexavalent chromium and nickel, whereby the amended background concentrations used from the greatest recorded sites already exceed the relevant standards (by 3267% and 193%, respectively).

The odour modelling has also been updated to reflect current site operational practices. The odour dispersion model included updated odour emission parameters, which then assessed three scenarios for normal operations, routine maintenance and maintenance using SEPA's odour Emission Limit Values within the current Permit. Additionally, odour effects have been assessed against SEPA's most stringent criterion of 1.0 ouE/m<sup>3</sup>. This 1.0 ouE/m<sup>3</sup> criterion was not exceeded at any of the receptors under normal operating conditions. Under routine maintenance conditions (using sampling odour data from the EfW), once receptor location was predicted to exceed the criterion, namely the BMX track adjacent to the facility. This location is not considered to be significant. A number of locations (19) were predicted to exceed this criterion when considering maintenance operations at the Permitted odour Emission Limit Values however, based on historic odour sampling data at the existing EfW facility, this scenario is considered to be highly unlikely to occur in reality.

MVV can confirm that the AQA updates do not materially affect the HRA report, therefore, the conclusions of the HRA report remains valid. Similarly, the updates to the AQA do not affect the EIRA report. The performance indicators section of the ERIA report has, however, been updated to provide the correct waste incineration capacity of the parallel operations (303,216 tonnes).

Comment:

*C2.1 The AQA refers to future changes as a result of the revised BRef, however, it does not discuss the existing plant, in addition to the one under construction. Both plant will have to meet the updated BRef requirements going forward. A discussion on the results should be included.*

Response:

MVV can confirm that both the existing EfW and EfW CHP facilities will meet BReF requirements going forward, and MVV will work with SEPA fully once the BAT review programme and process has commenced.

MVV can also confirm that the existing EfW facility is capable of meeting the emission limit values (BAT-AELs) contained within the recently issued Waste Incineration BReF document (December 2019).

Comment:

*C2.5 No evidence has been provided to confirm that Scottish Water will accept the additional discharge going forward as well as the existing volumes. This should be provided.*

Response:

MVV can confirm that Scottish Water have the capacity to take the effluents and surface water from both fully operational plants. Copies of the following correspondence from Scottish Water have been provided with this response letter:

- Capacity review letter
- New sewer connection approval (with the commercial information redacted).

MVV acknowledges that the above correspondence cannot be used to acquire a habitation certificate(s) from the local authority. Only a Certificate of Compliance, issued following a successful inspection by Scottish Water, can be used for this purpose. The inspection by Scottish Water is currently being organised and the relative documentation will be issued once available

Comment:

*C2.6/2.7 An explanation of plans for all additional residues to be recovered or disposed of, going forward, should be provided. Residues from the two plant may be very different and require different recovery or disposal routes;*

Response:

Details of residues have been provided in the Supporting Statement.

Comment:

*C2.8.1 The Heat & Power Plan makes no reference to the existing plant, which is the subject of this variation. A revised plan should be provided that includes the energy from the existing plant.*

Response:

The H&PP has been updated to include a description of the existing plant, energy and efficiency data in the same format as previously provided for Lines 1&2 and confirmation that the existing plant is not CHP capable.

As agreed with SEPA on 29 January 2020, the Thermal Treatment of Waste Guidelines (TTWG) don't need to be met as this is not a new plant, rather the H&PP has been updated to demonstrate that the existing facility is as efficient as possible.

Comment:

*C2.9 An account of potential increase in risks and hazards due to a virtual doubling of wastes inputs, and residues for removal, and the additional vehicle movements on site etc. should be provided.*

Response:

Risks associated with additional vehicle movements have been assessed in the Transport Assessment (see Planning Application 19/00922/FULM).

MVV's current onsite management plans will be reviewed and updated to account for the additional waste processing onsite.

Both facilities will share the same Fire water tank as the physical separation between the two facilities is sufficient that a fire is considered unlikely to spread from one facility to the other. This assessment has been accepted by Scottish Fire and Rescue Service and Dundee City Council Building Control.

Comment:

*C4.1 The Human Health Risk Assessment (HHRA) (originally submitted with the variation application) has not been updated. This must be reviewed and updated, and any increase to compounds of potential concern fully explained, to support the retention of the existing plant in this Variation application;*

Response:

MVV can confirm that the AQA includes a Human Health Risk Assessment (HHRA) which considered the effects of human exposure from emissions to air from the EfW CHP facility. The HHRA was undertaken in 2017 and included a cumulative impact assessment of both the existing EfW and new EfW CHP facilities operating in parallel. This cumulative assessment is included in Appendix G (Section 4) of the AQA. The 2017 HHRA cumulative assessment was reviewed as part of the parallel operations assessment; no updates were required, and the conclusions remain valid.

Details of the HHRA are provided in the supporting statement

Comment:

*C7.7 is incorrect. These are not separate Installations.*

Response:

SEPA advised on 29<sup>th</sup> January that this comment was in error. MVV can confirm that there are two facilities which share some common pieces of equipment (such as the weighbridges, RCPP, and Fire Water Tank) and, therefore, they are covered by 1 Permit (following previous guidance from SEPA).

Comment:

*F11 There was no Non-Technical Summary (NTS) provided. A separate NTS should be submitted with the re-submission;*

Response:

A separate NTS has been provided

Yours sincerely

A handwritten signature in blue ink that reads "D. Harper." The signature is written in a cursive, flowing style.

Debbie Harper

Associate Director

cc Paul Carey, Bruce Braithwaite & John Wade @ MEB  
Gordon Diamond & John Hodgson @ Arup