

 <b>Knowsley Council</b>	<p style="text-align: center;"><b>Planning Consultation Response</b></p> <p style="text-align: center;"><b>Environmental Health and Consumer Protection Service</b></p>
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To:	Planning Services (Planning)	
From:	Environmental Health & Consumer Protection (Ian Gaskell)	
Planning App. No:	22/00056/NEI	22/00494/PLANNI
Date:	February 2022	
Location:		
Proposal:	DEMOLITION OF EXISTING BUILDING AND ERECTION OF PURPOSE BUILT BUILDING (AND ANCILLARY STRUCTURES) TO HOUSE HIGH TEMPERATURE TREATMENT FACILITY FOR THE MANAGEMENT OF MEDICAL WASTE.	

### Unable to support the application in its current form

Environmental Health has reviewed the information submitted and we have some concerns which have been detailed below.

We understand that the proposed development would require an environmental permit, for the operation of a Small Waste Incineration Plant (SWIP) which would be regulated by West Lancs.

The type of process they are proposing to operate would be subject to stringent monitoring requirements and the process emissions, from the pyrolysis chamber, would be subject to high temperature. To be specific the emissions must be exposed to a minimum temperature of 1100°C for at least 2 seconds as required by the Industrial Emissions Directive.

However, we have looked at the air quality assessment / modelling and we have concerns with the assessment for hydrogen fluoride (HF) and chromium VI (Cr(VI)). The air quality assessment demonstrates that the contribution of the predicted environmental concentration (PEC), when compared against the environmental standard (Environmental Assessment Levels (EAL)), is over 100% for both HF (sensitive ecological receptors) and Cr(VI) (sensitive human receptors) in both West Lancs and Knowsley.

Although they predict that the process contribution will be less than the respective limit, the modelling shows that with the combined background levels there is an exceedance. We cannot therefore support the application at this point if the emissions will raise the pollution levels further above the limit, no matter how small, and whether it is with regards to the risk to the environment or human health.



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It maybe the case that the modelled exceedance is due to the background level used not being accurate for the area, given that there is no site-specific data available (as stated in the assessment). In order to progress with the planning application, I would therefore recommend that some real time monitoring, at the proposed site, for HF and CR(VI) is carried out, and then the assessment for these pollutants repeated using this data.

I would also query why the years 2013 to 2017 were used in the assessment, given we are in 2022. Understandably the levels in 2020 and 2021 may not be considered representative, due to Covid, but 2018 and 2019 data should have been used.



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