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| knowsley_logo_2010_rgb.jpg | **Planning Consultation Response****Environmental Health and****Consumer Protection Service** |

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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: | 27 July 2022 |
| Location: | Simonswood Industrial Estate, West Lancashire  |
| 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.**

Environmental Health has reviewed the updated information submitted and we still have some concerns which mean we cannot support the application in its current form.

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 Lancashire Council.

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 1100oC for at least 2 seconds as required by the Industrial Emissions Directive.

Whilst extending the chimney to 26 metres will help with dispersion of the emissions, the assessment still shows results that we are not satisfied with. This is with regards to Chromium VI, and we have previously commented on this.

We had previously raised concerns about the levels of Hydrogen Fluoride (and the impact on vegetation) and how the predicted level exceeded the weekly mean EAL (Environmental Assessment Level), but not the daily mean. Atkins have addressed this issue in their comments, stating that the Environment Agency’s (EA) approach to assessment against non-statutory critical levels is to ensure that the PC (process contribution) does not exceed 100% of the EAL, which is considered to demonstrate BAT (Best Available Technique). We are satisfied with this response. We would also expect HF to be monitored as part of the permit.

Having looked at the updated air quality assessment / modelling, we have concerns with the assessment for 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 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 (Step 2 of the EA screening method), 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, when there is already an exceedance, no matter how small, when it is with regards to the risk to human health.

It may be 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), however, as detailed in our previous comments, to progress with the application, we suggested that some real time monitoring, at the proposed site, for HF and CR(VI) is carried out, and then the assessment for Cr(VI) repeated using this data.

Atkins state that real time monitoring for Cr(VI) is not considered proportionate to the risk. However, we disagree and believe an accurate Cr(VI) background level should be obtained.

I previously queried why the air quality data between 2013 to 2017 had been 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 2019 data could have been used.

The report also refers to the continuous monitor we had in Briery Hey, Kirkby. Whilst this was decommissioned in 2017, a new continuous monitoring station was set up in 2019 at the junction of County Road / Old Rough Lane, and we have results for this. In their report they refer to reviewing the 2020 ASR, this would have included the new monitoring station.

They also mention they had no access to historical data for nitrogen oxides, whilst I cannot find any data from the old station, pre-2017, we do have some nitrogen oxide levels for the new one that was in operation, post-2019. It ceased operating in October 2021.