Response to Additional Information

This note has been prepared as a response to the additional information submitted by RPS dated 25th April 2024. This follows the Peer Review undertaken by Bureau Veritas for the Permit Application submitted in support of the Environmental Permit (EP) application (Ref. S13/006) by Calder Valley Skip Hire Ltd (CVSH). CVSH propose to operate a new Small Waste Incineration Plant (SWIP) at their Waste Transfer Station (WTS) site in Sowerby Bridge, West Yorkshire.

Table 1 sets out the additional information requested and provided and a further comment on whether this provides suitable additional information to respond to the comment.

Table 1 Summary of Additional Information Response

Item	Information requested	RPS response	Sufficient additional information provided?
1	Confirm that the modelled dimensions and associated stack parameters including height, diameter and efflux velocity match the actual installed stack.	The applicant has confirmed that the built stack diameter and heights is 0.4 m and 12 m respectively. This matches what was modelled in the air quality assessment. The efflux velocity (m/s) is calculated from the stack diameter (m) and the volumetric flow (m^3/s). These were agreed with the technology provider, inciner8, in 2018. Whilst it is not the case, if the stack diameter was smaller, the efflux velocity would be higher which would increase the momentum of the efflux air. This would increase the height of the plume and therefore increase dispersion.	Yes.
2	Additional information on the inputs for Ammonia, PCDs and Polyaromatic Hydrocarbons should be clarified as to whether the later version of the BAT reference document would lead to any changes in assumptions around modelling in the applicant's air quality consultant's opinion.	The BAT conclusions do not apply to the development and the SWIP will meet the emission limits set out in the permit	Yes, this is accepted.
3	The assessment has used an ambient concentration of Benzene but has not specified where this is from. It is assumed that this data has come from the 2001 background maps available on UK-Air but this must be confirmed.	The data has come from the Defra 2001 background map.	Yes.
4	The additional assessment has only completed sensitivity test modelling using NWP for NO_2 concentrations, though the previous assessment work has identified risks from multiple different pollutants. Further assessment of Arsenic in this sensitivity test would give greater confidence that the assessment of other pollutants of risk is aligned with the findings of the additional assessment of NO_2.	The sensitivity test using NWP data was not requested by the council or by either of the inspectors and has only been volunteered on behalf of the applicant to provide even more assurance that the impacts are not significant. The sensitivity test using NWP meteorological data focussed on NO_2 as this was the pollutant of most concern throughout the planning appeal (see paragraph 28 of the Appeal Decisions dated 4 February 2020) and the council's position in this respect did not change during the permitting appeal. Nevertheless, the maximum predicted concentrations across the modelled grid for the rest of the pollutants are summarised in the following section. For ease of comparison, in each of the Tables set out below, the maximum PC from Table 5.3 of the 2019 Additional Air Quality Assessment (using meteorological data) is presented in the fourth column. The results using NWP	Yes, additional information provided.

Item	Information requested	RPS response	Sufficient additional information provided?
		data are not materially different. As was the case in the 2019 assessment, the effects are considered to be not significant.	

In summary, appropriate additional information has been provided by the applicant in response to the queries and requests for additional information raised.

It is noted that the modelled concentration predictions using the NWP data resulted in generally higher concentrations of SO_2 compared to the original 2019 assessment which used measured meteorological data. It is accepted that these higher concentrations do not result in a predicted significant effect of emissions from the SWIP.

It should be highlighted that there are potentially significant emissions of Arsenic as a result of the development, but it is accepted that this comes from a conservative assumption used in the assessment and it is considered that this can be controlled through appropriate permit emissions limit values (ELVs).