These are my comments on the response from Calder Valley Skip Hire Ltd and the reviews by Calderdale Council and consultants Bureau Veritas.

| **INFORMATION TO BE SUPPLIED TO THE COUNCIL** | **DEADLINE FOR THE SUBMISSION** | **FINAL RESPONSE FROM Bureau Veritas** | **MY COMMENTS** |
|---|---|---|---|
| Confirm that the modelled dimensions and associated stack parameters including height, diameter and efflux velocity match the actual installed stack. | On or before 4:00pm on Tuesday 30th May 2024 | The applicant has confirmed that the built stack diameter and heights is 0.4 m and 12m 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 (m3 /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. | Why do they mention 'if the stack diameter was smaller'? I suggest that it is actually smaller than 0.4 m, not even 0.60 m, as stated in [redacted] planning decision 'The proposed stack would have an external diameter of some 0.6 metres'. The stack is not lined, is rusting, and condensation during operation would detrimentally affect the emissions. |

| INFORMATION TO BE SUPPLIED TO THE COUNCIL | DEADLINE FOR THE SUBMISSION | FINAL RESPONSE FROM Bureau Veritas | MY COMMENTS |
|---|---|---|---|
| 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. | On or before 4:00pm on Tuesday 30th May 2024 | The BAT conclusions do not apply to the development and the SWIP will meet the emission limits set out in the permit. | This is a negative answer that should be challenged by Bureau Veritas and CMBC.<br>'Best Available Technology, or B.A.T., is a term used to describe the most effective and advanced technology currently available for a particular industry or process. The idea behind B.A.T. is to reduce the negative impact on the environment, health, and safety by using the most efficient technology possible.'<br>Of course the BAT conclusions should apply to the development. |
| 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. | On or before 4:00pm on Tuesday 30th May 2024 | The data has come from the Defra 2001 background map. | This data is 23 years old and should not satisfy the needs of an Environmental Permit in 2024. |

| INFORMATION TO BE SUPPLIED TO THE COUNCIL | DEADLINE FOR THE SUBMISSION | FINAL RESPONSE FROM Bureau Veritas | MY COMMENTS |
|---|---|---|---|
| The additional assessment has only completed sensitivity test modelling using NWP for NO2 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 NO2. | On or before 4:00pm on Tuesday 30th May 2024 | 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 NO2 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 data are not materially different. As was the case in the 2019 assessment, the effects are considered to be not significant. | Bureau Veritas final report states 'It should be highlighted that there are potentially significant emissions of Arsenic as a result of the development,' which is not very reassuring; **potentially significant emissions** do not sound insignificant.<br><br>Response to Request for Further Information by RPS<br><br>Table 2<br><br>The short term emissions for $SO_2$ Process Contribution (PC) is potentially significant. As is the $SO_2$ 1 hour annual mean.<br><br>Table 3<br><br>The PC is potentially significant:<br>Cd<br>As<br>Co<br>Co<br>Pb<br>Mn<br>Ni<br>V<br>PAH's<br><br>Predicted Environmental Concentrations (PECs) results for Arsenic are As - Potentially Significant. It looks interesting, if not alarming, that the Max PC as % of EAL is recorded as 457.<br><br>The EPUK/IA QM Impact Descriptors for:<br>$PM_{10}$<br>$PM_{2.5}$<br>Both are recorded as negligible but this is not nothing and must still have an impact on the environment and health. |

This table below shows that $PM_{2.5}$'s are already higher than the Health Limit at the CVSH site 027E, and also exceeded on Wharf Street, Sowerby Bridge 017F which is to the north east of the site, being fed by the prevailing south westerly winds from the direction of the site (https://friendsoftheearth.uk/climate/air-pollution).

| Calderdale 027E | | | | Calderdale 017F | | |
|---|---|---|---|---|---|---|
| Annual concentration | | Health limit | | Annual concentration | | Health limit |
| $NO_2$ | 7.6 µg/m$^3$ | 10 µg/m$^3$ | | $NO_2$ | 9.3 µg/m$^3$ | 10 µg/m$^3$ |
| $PM_{10}$ | 9.8 µg/m$^3$ | 15 µg/m$^3$ | | $PM_{10}$ | 10.6 µg/m$^3$ | 15 µg/m$^3$ |
| $PM_{2.5}$ | 5.9 µg/m$^3$ | 5 µg/m$^3$ | | $PM_{2.5}$ | 6.4 µg/m$^3$ | 5 µg/m$^3$ |

I also found this recent annual report from the Calderdale 2023 Air Quality Annual Status Report (ASR) which I have copied, and which seems significant.

https://new.calderdale.gov.uk/sites/default/files/2023-11/EH-air-quality-annual-status-report-2023.pdf

• Industrial Sources o Calderdale Metropolitan Borough Council are engaging with local operators who hold environmental permits for combustion plant to ensure that emissions are within limits and, where possible, reduced even further. A Calderdale Metropolitan Borough Council LAQM Annual Status Report 2023 11 number of premises burning waste below the permitted threshold have been identified, and advice is being provided on obtaining a U4 exemption and, more importantly, reducing the smoke emissions from their appliances. Calderdale Metropolitan Borough Council is also working with the Environment Agency to identify and regularise waste burning in the borough.

*I have many other concerns about this Application for an Environmental Permit and I support the comments from* [redacted].

Yours sincerely,

[redacted]