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I would like to comment about the following application.

Calder Valley Skip Hire (CVSH)

Application for an Environmental Permit for Schedule 13 Small Waste Incineration Plant (SWIP) Reference: S13/006

There have been a number of inconsistencies in this whole procedure. These are a few examples from the most recent information for the above application on the Calderdale website under the heading 'Third consultation'.

<https://new.calderdale.gov.uk/business-services/licences/other/environmental-permits/current-recent-applications/calder-valley-skip-hire#docs:-:text=Third%20consultation,the%20next%20consultation.>

1. It is stated under the Third consultation that “**CVSH have now provided us with enough information for a decision to be made.**” This statement appears to predetermine the consultation.
2. The start and end dates have no explanation as to what they refer, and float in the middle of the section. ‘**Start date:** Monday 14th October 2024 (8am). **End date:** Monday 4th November 2024 (8am).’
3. The email address for responses is community-safety@calderdale.gov.uk which has a full stop at the end meaning that the email address was inaccessible for several days at the beginning of the third consultation period. This was also the case in the first consultation, when members of the public were frustrated in submitting their comments.
0. ‘*Email updates* If you received emails from our Community Protection Team, you will be notified again with details of the next **consultation.**’ This implies that there will be a **Fourth consultation.**
1. ‘*Further documents* These will available before the next consultation starts.’ This also implies that there will be a Fourth consultation.

[Response to 2nd Notice to Request Further Information](#) (29th July 2024). From RPS on behalf of CVSH.

INFORMATION TO BE SUPPLIED TO THE COUNCIL	DEADLINE FOR THE SUBMISSION	Excerpts from the replies	Concerns	My comments
Confirm, by way of technical documentation supplied by the manufacturer, that the i8-1000 small waste incineration plant can facilitate a burn rate of up to 2000kg per hour.	By or before 4:00pm on 31st July 2024	<p>As part of the CVSH due diligence prior to installing the SWCP Director (at that time) XXXXX visited an operational Inciner8 i8- 1000 SWCP at a site in Stockport. This unit incorporated an Autoloader similar to the CVSH SWCP. Trials were carried out.</p> <p>...whilst the application seeks to operate the facility at up to 2,000 kg/hr, the facility will not be operating at this maximum capacity at all times or even most of the time.</p>	<p>This is heresay. No times, dates, addresses, contact details, or technical documentation.</p> <p>This statement is irrelevant as they have applied to run the plant at 2000kg, (or 2kg as in the EP application) per hour.</p>	<p>NOT ANSWERED</p> <p>This is evidently not technical information, and if any technical documentation exists, members of the public have not been informed by CMBC.</p> <p>'Whilst manufacturers documentation is only available for the standard design with a federate of 1,000 kg/hr...' this information is in one of the three i8-1000 brochures provided in the Technical Documents (Appendix D). Two of the brochures provided state 'The i8-1000 is the largest incinerator in our range, with a burn rate of >500kg per hour'.</p> <p>These brochures do not provide technical documentation that the plant could operate at over 1000 kg/hr.</p>
It is unclear within the text of the Air Quality Assessment whether the burn rate has been used to inform any of the emissions calculations. Confirm if the burn rate has	By or before 4:00pm on 31st July 2024	Planning permission for the SWCP was granted on appeal by the Planning Inspector on 4 February 2020	Referring back to the Planning permission is not the same as answering questions for an Environmental Permit.	<p>NOT ANSWERED</p> <p>NOT DOCUMENTED</p>

been used, and if so, specify what burn rate has been used.				
Confirm by way of technical documentation supplied by the manufacturer that the abatement equipment fitted to the i8-1000 incinerator can achieve the Industrial Emissions Directive (IED) limit values that have been used within the Environmental Statement Addendum Additional Air Quality Assessment and ES Addendum to the 2017 ES Chapter 7: Air Quality at a higher burn rate of 2000kg	By or before 4:00pm on 31st July 2024	<p>A technical specification for the pollution control system was provided within Appendix D</p> <p>*Dioxins, furans and similar gaseous components are only destroyed by: Homogenous high temperature (> 850°C) Excess of oxygen (>6 %) Sufficient residence time at high temperatures Our incinerators are designed to ensure all 3 conditions are met. The three conditions above prevent dioxins from “cracking” into smaller but reactive dioxins, which can reform into new dioxin molecules, especially in the presence of heavy metals which can act as catalysts. (Reformation and "de novo" formation)</p>	Technical Documents (Appendix D)	<p>NOT ANSWERED</p> <p>The information at Appendix D is a paragraph in a brochure and not technical documentation to allay the worries of the local community who would have to live close to this plant, as well as those in the nearby AQMA. From the question one would expect detailed Air Quality Assessments at a higher burn rate of 2000kg. As a lay person I believe that the emissions would then be much greater due to the filter system, heat exchanger and add-ons requiring a higher flow and therefore, also, the weight of gasses which would affect the residence time. This would be hazardous and allow the venting of untreated gasses direct to the atmosphere.</p>
			Pollution Control	
			Systems	
			(Inciner8).	
			<p>BASIC Pollution Control</p> <p>*This is the one, only, paragraph provided which is for the model i8-1000, designed to burn 600kg per hour, certainly not over 1000kg per hour</p>	

Confirm the flow rate simulation report remains accurate if the burn rate increases to 2000kg per hour.	By or before 4:00pm on 31st July 2024	<p>... computational fluid dynamics (CFD) modelling submitted within the permit application was carried out using measurements taken on site and information from the manufacturer's specification. On this basis the CFD study was carried out assuming a burn-rate of 1,000 kg/hr.</p> <p>The CFD modelling at the burn-rate of 1,000 kg/hr made a number of conservative assumptions and therefore is likely to under-estimate the residence time at this throughput...</p> <p>...further options available to CVSH to ensure IED residence time requirements can be met. These <i>could</i>, for example, include the insertion of baffles <i>or similar</i> within the second chamber to increase residence time. It is understood that the latest versions of the i8-1000 unit incorporate a design enhancement of this kind.</p>	<p>This looks at 1000kg per hour and not 2000kg per hour. This does not provide any technical documentation to alleviate the many concerns. Eg production of carbon monoxide, inadequate air flow, safety of workforce in the building including at night with the shutter doors closed.</p> <p>Using the words 'could', not would, and 'or similar' is not adequate information.</p> <p>The last sentence is not relevant, because the unit in situ is quite old and not the latest version of the i8-1000.</p>	NOT ANSWERED
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Confirm the total bottom ash capacity of the i8-1000 incinerator.	By or before 4:00pm on 31st July 2024	<p>The capacity of the bottom ash compartments, as currently installed, is circa 1.8m³. However, that too may be subject to modification.</p> <p>Inciner8 has introduced ... de- asher (which) utilises a water quenched conveyor that runs through the bottom of the incinerator, catches all resultant ash and automatically transports it to an ash-bin.</p> <p>The current ash storage capacity would, therefore, be irrelevant.</p>	<p>There are many variables being mooted, which suggests uncertainty of the size or type of the plant sections.</p> <p>Water and ash suggests that it could spill. How large would the ash bin be?</p> <p>Of concern.</p>	NOT ANSWERED
Stipulate the approximated amount of bottom ash generated over a 24hr period with a burn rate of 1000kg per hr and 2000kg per hour.	By or before 4:00pm on 31st July 2024	The i8-1000 brochure submitted with the permit application indicates bottom ash production is expected to be circa 3% of the RDF input. At 1,000 kg/hr this equates to 30 kg/hr of bottom ash and at 2,000 kg/hr approximately 60 kg/hr of bottom ash would be produced. Over a 5 day period this would equate to 3.6 to 7.2 tonnes of bottom ash.	<p>'Bottom ash that remains at the end of the grate is collected in an underfloor ash container and manually raked from the plant into sealed ash containers. The frequency of bottom ash removal is dependent on the ash content of the residual waste materials and will typically be 10%.'</p> <p>JER1902 Calder Valley Skip Hire 3 2 05 August 2020</p>	<p>NOT ANSWERED</p> <p>Manually raking the bottom ash – health risk to workforce especially at night when doors closed.</p> <p>Inaccurate estimations of amount of bottom ash generated. From 3% to 10% as evidenced in the two different estimations in the column to the left.</p> <p>1,000 kg/hr If bottom ash produced is 3%, as stated in their answer that it would equate to 30kg/hr. If bottom ash produced is 10% as stated on 05.08.2020 then it would equate to 100kg/hr.</p> <p>2,000 kg/hr If bottom ash produced is 3%, as</p>

			<p>The SWIP will be operated in such a way as to achieve a level of incineration such that the total organic carbon content of slag and bottom ashes is less than 3 % or their loss on ignition is less than 5 % of the dry weight of the material.</p> <p>EMS Addendum for SWIP (Version 2)</p>	<p>stated in their answer that it would equate to 60kg/hr. If bottom ash produced is 10% as stated on 05.08.2020 then it would equate to 200kg/hr.</p> <p>Over a 5 day period this would actually equate to 3.6 to 14.4 tonnes of bottom ash, using their calculations.</p>
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Calder Valley Skip Hire Small Waste Incineration Plant (SWIP) Permit Application S13/006

Response to Bureau Veritas Peer Review of the Human Health Risk Assessment

In their preamble to their replies, CVSH say that 'Bureau Veritas was appointed by Calderdale Metropolitan Borough Council (CMBC) to peer review the Human Health Risk Assessment (HHRA) submitted in February 2022 in support of the previous Environmental Permit application for a small waste incineration activity by Calder Valley Skip Hire Ltd (CVSH) which so far as concerns the HHRA is identical to the current Environmental Permit application. This same HHRA was submitted again in support of the current application.' This was a report which Inspector John Woolcock considered, yet he refused the EP on human health grounds, so why should Bureau Veritas accept this identical HHRA as unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment .

CVSH also say that 'CMBC had the February 2022 HHRA and Tetra Tech's March 2022 assessment and had had the opportunity to review them well before it, as advised by its Counsel, submitted its Opening Statement in the subsequent appeal which stated that the Council had concluded that there are no legitimate grounds or basis to resist the grant of a permit subject to appropriate conditions', this

not recognizing that this same Hearing resulted in the EP being refused as the representative of the Secretary of State was unable to find that granting an environmental permit for the SWIP would not have an unacceptable adverse effect on human health and the environment . .

RPS, on behalf of CVSH, also said 'It is, therefore, with respect, to be deprecated that approximately 2 1/2 years after the Tetra Tech review CMBC has asked another consultancy to review the HHRA again. This is another element of unreasonable behaviour on the part of CMBC. We hope that CVSH will not have the need to pursue the issue of CMBC's conduct but it reserves its right to do so should that become appropriate particularly as regards costs.' which is one more example of their use of intimidating language.

Bureau Veritas Peer Review	Excerpts from the replies and my notes	My comments
The modelled residential receptors do not align with the Air Quality Assessment. Of particular concern is the worst case modelled receptor from the Air Quality Assessment (identified as '5' within the AQA) has not been modelled in the HHRA. It would be beneficial to include this.	'IRAP adopts the worst-case exposure for each defined area based on both airborne concentration and deposition.' .	These are modelled in an area which has a multitude of unpredictable weather conditions There are no benefits to any amount of pollution, no matter how small. 'Air pollution is among the biggest health problems of modern industrial society and is responsible for more than 10 percent of all deaths worldwide (nearly 4.5 million premature deaths in 2019)' to The Lancet .
	...'there would be no value in including the worst-case modelled receptor identified in the AQA in the HHRA model'. There is Met Office evidence that weather modelling, therefore AQ modelling, is not possible in this valley.	I am sure that anyone living in the area could explain the specific problems of the weather in and around this incised plateau in their own way, to demonstrate the poor air quality already in the area, and which would be much worse if the EP were approved.
It should be confirmed that the ADMS model outputs used for the IRAP software were based on the worse case sensitivity tests from the Air Quality modelling assessment.	'The predicted process contributions' is the first line of the reply. That seems to suggest that the figures are estimations of possible outcomes in possible weather conditions with perfect filtering of the particulates. That is an unlikely outcome.	The tables do not show which figures are from ADMS or IRAP modelling, whether they are real readings at the locations mentioned, or estimations.
There are some assumptions used in the assessment which would benefit greater evidence, i.e. assumption of a 70 year lifespan and assumption of 20 kg average child weight.	'The 70 year lifespan is not actually used for assessing intake'. The 20 kg child is used as the background intake for a child as derived by the Environment Agency which uses a 20 kg child.	NOT ANSWERED

There are many other issues that I could have included, but others will, I hope, have raised them. For instance, there are real concerns about the formation of the plant, the design of which should have been agreed alongside planning, and which seems to be an amalgamation of disparate parts. In the UK, if any plant is moved, modified, adapted or changed in any way, it must be re-certified and issued with a new CE or UKCA mark or label, which must be visible on the plant. I would like to support the comments raised by Kate Dearden MP and urge Calderdale to reject the Environmental Permit application, as Cabinet did at Mearclough, and as Cabinet proved that it can make such a decision when it made the decision to approve the EP on 8th February 2021.

Yours sincerely,

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