



D Ŵ R C Y M R U
W E L S H W A T E R

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Dr Amanda Owen
Environmental Consultant
Enviroparks Limited
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Date 2nd October 2008

Dear Dr Owen,

Trade Effluent Consent Application for Proposed Waste Handling and Energy Production Process at Hirwaun Industrial Estate

Further to your recent application for a trade effluent discharge consent for the above premises, the following aims to clarify the current position on the proposal.

Hirwaun Waste Water Treatment Works is consented for a DWF of 1119 cubic metres per day or 26 litres per second, and a final effluent quality of 10 mg/l Biochemical Oxygen Demand (BOD), 5 mg/l Ammonia and 15 mg/l Total Suspended Solids.

Based on the information provided to date, there is sufficient capacity at the works for the proposed volume of 240 m³/day at a rate of no more than 3 l/s. However, in terms of the treatment capacity, a 20000 population equivalent in terms of BOD and solids would be considered unacceptable. As can be seen from the above consent limits, there is little capacity available for accepting trade effluent requiring this level of treatment.

Part of the proposal is for a "biomax" process to treat Category 1-3 animal by-products, the resulting effluent to be treated in a sequencing batch reactor and with reverse osmosis prior to anaerobic digestion.

Our understanding of the Animal By-Products (Wales) Regulations 2003 (using DEFRA guidance) is as follows:

Category 1 animal by-products are not allowed to be treated in composting or biogas plants under any circumstances. The only acceptable method of treatment for Category 1 material is incineration.

Category 2 animal by-products cannot be used as feedstock in composting or biogas plants, except where it has first been pressure rendered in an approved plant to EU standards.

Category 3 animal by-products can be treated in composting or biogas plants in accordance with the EU regulation (EC 1771/2002).

Therefore, under the current proposal, Dwr Cymru could only accept trade effluent derived from Category 3 material, subject to the required level of treatment.

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If Enviroparks Limited has a different understanding of the above Regulations, could you please provide an explanation of how the current proposal meets them.

I trust this clarifies our position at this stage. In the meantime if you have any queries or would like to discuss this further, please contact me on the number given below.

Yours sincerely



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