

Summary of the Runcorn incinerator issues UKWIN raised with the Environment Agency

January / February 2025

Introduction

The Runcorn incineration plant requires both planning permission and an Environmental Permit to operate. Halton Borough Council has responsibility in terms of compliance with planning conditions while the Environment Agency has a regulatory role with respect to compliance with permit conditions. There is some potential overlap of responsibilities, e.g. the council with respect to responding to statutory nuisance and the Agency with respect to potential pollution from a permitted site.

The United Kingdom Without Incineration Network (UKWIN) is a national network of environmental campaigners and campaign groups working to support the move away from incineration across the UK. In addition to having originally worked with Runcorn residents to oppose the original incinerator proposals, UKWIN has, for years, advised residents about amenity and other issues relating to the operation of the Runcorn plant. UKWIN's website is at <https://ukwin.org.uk/>

Having spoken with a number of local residents who had raised a series of concerns about the impact of the Runcorn incinerator on amenity UKWIN met with the Environment Agency (EA) on Tuesday 21st January 2025 to ask relevant questions about these concerns and to listen to the EA's answers.

The purpose of this meeting was to help UKWIN to better understand the EA's position about where things currently stand on these issues and what sort of next steps could be taken that could help confirm or resolve the issues. An agreed summary of these initial exchanges is set out below.

Incident Hotline

The Environment Agency asks that residents report any issues relating to Viridor Energy Limited to our 24-hour Incident Hotline. This can be done by calling the EA's freephone number on 0800 80 70 60 or by emailing incident_communication_service@environment-agency.gov.uk as close to the time of the incident as possible.

Steam resulting in odours and damp

- When we talk about steam, we understand this to be steam from the cooling towers, as distinct from the plume from the chimney stack. The Environment Agency uses the term 'visible water vapour' for the visible portion of what local residents call 'steam'.
- A video shared with us taken at night from a Westfield Road property shows visible water vapour from the Runcorn incinerator cooling tower extending over numerous houses.
- It is understood that there is CCTV / video footage showing the steam reaching a garage and other nearby properties along Clarks Terrace.
- There are also photographs showing mould and damp at a Clarks Terrace property, and the resident is willing to allow surveyors to examine the property.

Concerns Raised with the EA	Summary of EA Position
<u>Water vapour grounding events</u> Residents raised concerns with us about current and historic water vapour grounding events.	<u>Water vapour grounding events</u> The Environment Agency is aware of a historic water vapour grounding event which resulted in a substantiated complaint (from 31st March 2022) based on a video showing visible water vapour reaching a property in Runcorn. This substantiated complaint resulted in the operator being required to monitor the level of visible water vapour grounding and take corrective action in the event that visible water vapour appeared to be grounding as part of a plume control procedure approved by the EA. The EA have not substantiated any complaints of water vapour grounding events since this plume control process was put in place to lift the plume higher up when needed. Viridor committed to introducing closed circuit plume surveillance monitoring equipment consisting mainly of two cameras aimed specifically to target the water cooler plumes on the south and north side, a weather station and a 1-hour

Concerns Raised with the EA	Summary of EA Position
	logging system as part of the plume control procedure. Viridor's updated plume control system was confirmed as having been implemented on 9th December 2022 and this was inspected by the EA during an unannounced visit following the first cold snap of winter 2022. The Environment Agency remains interested in receiving any further recent video or photographic evidence showing visible water vapour not just above properties but actually touching properties.
<u>Steam / water vapour resulting in odours up to around 700 metres downwind of the incinerator</u> Residents complained to UKWIN about acidic and/or oily smells (likened to rotten eggs / sulphur) accompanying the steam. This is said to be common at Clarks Terrace and more widespread at times depending on wind direction. We understand this is experienced most frequently by the 9 occupied houses on Clarks Terrace and is experienced at times by all residents of the 36 houses of the L-shaped housing development that includes Clarks Terrace and Mersey View. Residents have asked if it is possible that any additives being used as part of the cooling system are contributing to this bad smell.	<u>Steam / water vapour resulting in odours up to around 700 metres downwind of the incinerator</u> The EA investigated odour concerns and have not observed any odours associated with steam or water vapour. The EA is familiar with the sorts of chemicals used as additives as part of the cooling system, and do not believe that any of them are capable of resulting in the reported smells. This means that the odour reports made to date are considered by the EA to be unsubstantiated. However, if residents report new issues of odour relating to water vapour, then the EA could investigate this further. It would be helpful for any reports to be made by the individual who can smell the odour as promptly as possible, because delays between the report and investigation would make it more difficult to substantiate any complaints.

Concerns Raised with the EA	Summary of EA Position
<u>Steam resulting in damp and health issues at one or more Clarks Terrace properties</u> Steam from the incinerator is linked to damp and mould in multiple nearby properties, e.g. in a resident's kitchen, bedroom, and outer wall. UKWIN has also been made aware of reports of stuffy noses and sore throats - that have arisen in particular over the past four or five years, and that remain a regular problem for Clarks Terrace residents, and for visitors who complain they can 'taste the damp in the air'. This problem is linked by residents to breathing difficulties, including at least one diagnosed case of COPD.	<u>Steam resulting in damp and health issues at one or more Clarks Terrace properties</u> To date the EA has found no definitive correlation between the water-cooled condensed plumes and the mould that has appeared in at least one nearby property. The EA noted that other causes of damp, including poor ventilation and the proximity to a water body may be contributing factors. The EA has yet to substantiate any complaints about steam/water vapour from the Runcorn incinerator's cooling towers causing and/or exacerbating damp and mould. In the event that this issue is being experienced at more than one property, the EA would be interested to learn more about these other instances of damp and/or mould directly from those living in those other properties.

Odour Management Plan (OMP) issues

- Permit V003 requires the operator to operate in accordance with the “Approved version of the site’s Odour Management Plan (v2.5 dated 03/01/2023, received 19/01/2023)”
- The Compliance Assessment Report (CAR) dated 11th January 2021 included the statement that: “The EA will record a breach of the permit on every occasion where the waste reception hall entrance [is] found to be open between deliveries and if the doors are not self closing. Further action would then be considered”.
- Page 16 of the Odour Management Plan states: “...use of the vehicular access door should be minimised. Therefore this door should be closed when not in use, where possible”.

Concerns raised with the EA	Summary of EA Position
<u>Odours from the installation</u> ‘Bin smell’ odours have been detected by at least two residents at several Westfield Road properties even when the tipping hall doors were closed over the weekend. Wind was blowing from the tipping hall towards the houses. The same smell was detected on land near the tipping hall at the same time. One resident observed that from time to time, the Odour Management Plan limits on the number of lorries queuing at the tipping hall entrance / the ramp are being exceeded during normal operations. Residents are concerned by the fact that the operator continues to allow tipping hall doors to remain open for longer periods than the EA’s Compliance Assessment Report (CAR) dated 11th January 2021 indicated would be acceptable.	<u>Odours from the installation</u> The EA has previously taken action to ensure that the risk of odour issues is reduced, such as expecting the operator to fix the broken vehicular odour access door and to agree an Odour Management Plan. Despite having devoted a significant amount of time carrying out odour checks, especially in 2020 and 2021, the Environment Agency has so far not been able to establish or substantiate an issue of the installation causing odour problems at nearby houses. While the EA generally expects the operator to follow the Odour Management Plan, investigating the operator’s level of compliance with the Plan is likely to only be a regulatory focus for the EA in the event that there are substantiated odour complaints that could trace back to non-compliance with the Odour Management Plan.

	During the EA's site visit on 17 January, the Regulatory Officer observed vehicles queueing on Barlow Way. A grab in the centre of the waste bunker was out of action, resulting in several waste tipping bays to be non-operational. This caused a temporary backlog with the waste vehicles. The vehicles were being managed in accordance with the Odour Management Plan and staff on-site were guiding vehicles to the temporary holding areas. Any vehicle already in transit could not be stopped from arriving at the site but, waste fuel supply companies were contacted to prevent more from arriving until the issue had been resolved. When the Regulatory Officer was leaving the holding areas, no queueing traffic was observed. The Environment Agency confirmed that in their view the opening and closing of the tipping hall doors is now being managed correctly and in accordance with the Odour Management Plan. The precise length of time that the vehicular access doors are allowed to remain open is not a matter that the EA would be likely to investigate unless the doors being left open was tied directly to a potentially serious odour issue being caused for residents. If residents experience any serious odour issues that they believe may be caused by the Runcorn plant, including but not limited to the tipping hall doors being left open for extended periods, then they are asked to report them promptly and directly (i.e. not through a representative).
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Odours from vehicles

Noxious odours are regularly experienced on gardens at Clarks Terrace.

Strong unpleasant bin smells are present for a few seconds as each waste delivery vehicle goes past to and from the incinerator.

Clarks Terrace residents report that these smells have been noticeably worse since the move away from the feedstock being in the form of RDF delivered by rail and towards a greater proportion of the feedstock being 'raw' mixed waste delivered by road.

Some of the vehicles appear to be dirty and in poor repair.

Odours from vehicles

EA Officers have themselves observed unpleasant short-lived odours from vehicles that can impact residents in their gardens.

However, the smell of vehicles on highways is not something regulated by the Environment Agency and nor is it regulated by the Council.

The EA have not observed odour from vehicles resulting in odour problems for houses once the vehicles are within the installation.

Noise

- UKWIN has been provided with some recordings of noises showing how the humming / whooshing noise from the cooling towers experienced at Clarks Terrace differs from the grating / grinding mechanical noises experienced at Westfield Road, presumably emanating from the boiler house and/or waste bunker (and/or from the transfer of waste from the bunker to the incinerator).
- UKWIN has been made aware that the October 2023 Viridor Noise Survey by SLR (Table 3-1 NVM Assessment) found impacts over 10dB which is a threshold for significant impacts.
- Evidence on Table 6-2 of SLR's 2023 Noise Assessment shows how a noise survey at Westfield Road indicated that after remediation work the plant noise is worse at Westfield Road and better than it had been at Clarks Terrace. Red numbers are the situation prior to remedial work.
- A comment on Table 6-2, the SLR Noise Assessment stated: "Westfield Road: The difference between the baseline background sound level and the rating level is between 13dB(A) and 16dB(A) above the baseline background sound level at Westfield Road. This is an indication of significant adverse noise impact in accordance with BS4142. The results are consistent with the unmitigated Report where the comparable dataset was 15dB(A) above the baseline background sound level".
- In 2021 Viridor was a Rule 6 Party as part of the planning inquiry that considered the "Proposed Demolition of Pavilions Clubhouse followed by Development Comprising 139 Dwellings with Associated Ancillary Development" at The Pavilions, Sandy Lane, Runcorn, Cheshire, WA7 4EX. Viridor objected to the proposed development and provided a noise witness named Craig Barson (a Corporate Member of the Institute of Acoustics with a Ramboll Director with a BEng (Hons) degree in Electroacoustics from the University of Salford, with "extensive experience of the noise from the road network in Runcorn").
- Craig Barson's Proof of Evidence included a reference to how: "As a broad estimate, the traffic flow on the A557 that passes the Application Site is now less than 10% of the value in 2017. Consequently the noise from vehicle traffic is very drastically reduced and the context and impact of the ERF operation more significant at the Application Site than assessed in 2017". In other words, with the reduction in traffic noise, the noise from the Runcorn incinerator went from being masked (apart from during lulls in the traffic flow) to being predominant at Westfield Road.
- Viridor's environmental permit application to introduce carbon capture technology at the Runcorn incinerator is currently being considered by the Environment Agency. Such technology is associated with increased noise. As part of this process, Viridor submitted a report from Savills on noise impacts from November 2023.

Concerns Raised with the EA	Summary of EA Position
<u>Noise issues at Clarks Terrace</u> The constant humming / whooshing noise that all Clarks Terrace residents are experiencing in their houses and in their gardens. Residents want to see the detail of the investigative noise assessment to determine the dominant noise sources on site with respect to Clarks Terrace.	<u>Noise issues at Clarks Terrace</u> The EA accepts that there were historic noise issues at Clarks Terrace, and as a result the EA had requested the operator introduce measures to reduce the noise, which the operator has now carried out (at some expense). An INVC report from June 2024 identified a small number of additional measures that could further reduce noise at Clarks Terrace. In response to a request from UKWIN, the EA provided UKWIN with a copy of the INVC report from June 2024 entitled 'Cooling tower noise control audit'. A copy of this report is available at: https://ukwin.org.uk/library/72-INVC-Noise-Report-2024.pdf The report, commissioned by the operator at the request of the Environment Agency, concluded that: "The main source of tonal noise at 140Hz and harmonics at position A is related to the salt works. However, the Viridor site does contribute to the broadband noise at that location". The report further found that: "The noise level from the Viridor site has been significantly reduced since INVC's assessment in August 2022, with reductions of 10-15 dB for tonal noise and 8dB for the overall level" and that: "The current main contributors to the overall level at Clarks Terrace are the Phase I cooling tower air inlets and the [relevant] steam return valve[s]". It is the EA's understanding that the Runcorn incinerator operator is implementing the report's recommendation to introduce noise control measures for the relevant steam return valves and to follow up on this with a

Concerns Raised with the EA	Summary of EA Position
	review of the noise reduction at Clarkes Terrace and a consideration of whether additional measures to reduce the noise from the Phase 1 water pumps would be proportionate. The EA is not aware of any current serious noise pollution issues at Clarkes Terrace arising from the Runcorn incinerator. The Runcorn incinerator is due for a scheduled temporary shutdown for maintenance in the summer of 2025 where both the boilers and the turbine will be offline. The EA is in dialogue with the operator about requesting them to carry out a background noise survey during this shutdown. If residents experience any serious noise issues that they believe may be caused by the Runcorn plant, then they are asked to report them to the EA promptly and directly (i.e. not through a representative).
<u>Noise issues at Westfield Road</u> Multiple Westfield residents complain that the grinding noise from the incinerator they are currently experiencing is causing them difficulty sleeping with windows open, and resulting in the loss of enjoyment of their gardens (especially in summer evenings), and also problems during the day (even if not as acute as in the evenings). Residents want more information about the scrutiny that has been given by the EA to SLR's October 2023 Noise Assessment, especially in light of the significant reduction in traffic noise associated with the Expressway (as per Viridor's Pavilion	<u>Noise issues at Westfield Road</u> An Environment Agency officer has visited Westfield Road on multiple occasions and has been unable to substantiate complaints of noise pollution relating to the Runcorn incinerator. The EA has not requested expert scrutiny of the noise reports carried out for the operator. The reason for this is because the conclusions reached align with the EA's experience, so the EA does not believe expert scrutiny of the noise reports would be proportionate. If residents experience any serious noise issues that they believe may be caused by

Concerns Raised with the EA	Summary of EA Position
evidence) which has made the noise from the incinerator more prominent.	the Runcorn plant, then they are asked to report them to the EA promptly and directly (i.e. not through a representative). The EA confirmed that if residents provided a copy of a privately commissioned noise survey within their complaints that this is something that the EA would be able to take into account when assessing the noise complaint.
<u>Risk of carbon capture plant exacerbating noise issues</u> Residents are concerned about the additional noise that would arise from Viridor's introduction of carbon capture technology at the Runcorn incinerator. Concerns include the fear that the noise assessment for the proposed carbon capture unit is based on the current noise level as the baseline, without additional mitigation of those noises, when they believe the baseline should therefore be lower to take account of mitigation, meaning the adverse noise impact of adding carbon capture should be fully considered before an environmental permit is issued. Residents are concerned that the Savills report from Viridor appears to assume that current noise issues will not be further mitigated. This either means the problem is unsolvable, or implies an incorrect baseline is being used which could mean the additional adverse impact of the carbon capture plant might be underestimated. Residents want to see the noise issues being resolved / lessened and not exacerbated.	<u>Risk of carbon capture plant exacerbating noise issues</u> The EA will be assessing the risk of extra noise carefully as part of the permitting process and can confirm that those involved in regulating the site have been internal consultees on the carbon capture permit application. If further information is requested of the applicant in relation to noise then their response will be made available as part of any minded-to consultation on a decision to issue the permit variation (if that is the outcome).

Fire Management / Emergency Response Plan:

- On Monday 6th January 2025 a Clarks Terrace resident complained to the EA about a fire incident involving “the wagon that turned up to the Runcorn Viridor site, on 27th December 2024 which was on fire”.
- The email message includes a narrative description of how the events unfolded, indicating the situation caused great distress.

Concerns	Questions
<u>Fire Management and emergency response</u> An incident of 27th December 2024 seemed to indicate to residents either that fire and emergency planning was inadequate, or that the procedures were not followed in that instance.	<u>Fire Management and emergency response</u> As per the correct and agreed procedure, Viridor informed the EA of this incident on the day it occurred. The EA was informed that waste had begun to smoulder (i.e. there was smoke but no flame) and that the incinerator operator, along with the vehicle operator, decided not to drive the vehicle a considerable distance through the site, but instead to address the situation near the site entrance. The Fire Service was contacted, and in the EA's view the measures taken were swift and pragmatic. The EA also confirmed that lessons can be learnt from this incident, and the incinerator operator has confirmed to the EA that they are reviewing their Fire Prevention Plan because of this incident. The current Runcorn incinerator's Fire Prevention Plan (Version: 4.0), dated 22nd February 2019, is available at: https://ukwin.org.uk/library/72-FirePreventionPlan-2019.pdf

Further actions from the Environment Agency

Concerns	Questions
<u>Further actions from the EA</u> Residents were wondering what more the EA could do to prevent the incinerator from harming their health and quality of life.	<u>Further actions from the EA</u> The EA confirmed that where complaints of serious environmental pollution incidents are substantiated then the EA will take appropriate measures to ensure that these issues are resolved. However, the EA must be proportionate in the use of their regulatory powers.