

**Mark Hill**

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**From:** REDSTON CHRIS  
**Sent:** 11 August 2015 21:07  
**To:** Mark Hill  
**Subject:** waste water problem at Ebberston Moor

Dear Mark

Further to previous comments, the issue I was referring to regarding the waste water disposal that has reared its head in the EA consultation draft decision is as follows.

This is from the Ebberston Decision Document - Draft on this page on the EA site:  
[https://consult.environment-agency.gov.uk/portal/npsapp/thirdenergy/third\\_energy\\_uk\\_gas\\_limited\\_1?pointId=3425264](https://consult.environment-agency.gov.uk/portal/npsapp/thirdenergy/third_energy_uk_gas_limited_1?pointId=3425264)

**Re-injection of produced waters is allowed under Water Framework Directive (Water FD) and the Groundwater Daughter Directive. Radioactive waste is excluded from the scope of the Waste Framework Directive (Waste FD) by virtue of Article 2(1)(d) of that directive. Therefore produced water containing NORM above the values in the 2010 Regulations will be regulated as radioactive waste and will not be subject to the ban on the disposal of liquid waste set out in the Landfill Directive (LFD).**

**This discharge shall only take place where the concentration of NORM exceeds the value specified in paragraph 5 of Part 2 of Schedule 23 to the 2010 Regulations, such that the discharge is radioactive waste for the purposes of Schedule 23 to the 2010 Regulations. The monitoring and reporting of NORM is outlined in the RSR permit EPR/NB3595DJ. Should the produced water contain no or NORM below the required values it shall be removed from the EM-S site and disposed of at an appropriately regulated waste facility, and not disposed of into the SSF.**

A couple of things about this. Firstly, the section I have highlighted in blue states that if the NORM values of the produced water are below the required values, the water cannot be re-injected into the Sherwood Sandstone layer, and instead needs to be removed from the site (presumably by tanker, as there is no waste disposal pipe on the site, or in the plans). Whether it can be re-injected or not therefore depends on real-time on-site analysis of the waste water as it comes out of the ground.

This seems to be a major issue for the NYMNPA, as it opens up the very real possibility that some or all of the waste water produced might have to be trucked off site, with the consequent impact on traffic, highway maintenance, noise, pollution, damage to the verges, etc. The maximum re-injection rate is 556 m3 per day, which translates to about 30 tankers of waste water per day. The Application will not know if the water can be re-injected or not until it has been brought to the surface and tested, and the possibility of a high level of waste water tanker movements have not been included in the application documents or any consultations on the matter, which puts the planning authority in a very difficult position.

My understanding of the application is that this possibility has not been considered by the applicant, and therefore by the NYMNPA, so I thought it was something worth raising at this point.

Hope this is helpful.

Best wishes

Chris

