

Joanna Holland
H&C Consultancy
15 Sherborne Road
West Bridgford
Nottingham
NG2 7BN

Our ref: EB3800HM-V005 DM letter

Date: 07/03/2019

Dear Joanna

We need more information about your application and underpayment of application charge

Application reference: EB3800HM-V005
Operator: Advantage Biogas Limited
Facility: Dryholme Farm

Thank you for your application received on 7th December 2018. The following is to confirm our conversations of 6th and 7th March 2019.

I need to ask you for some missing information before I can do any more work on your application.

1. Application Forms

The declaration within form F1 is signed by Matt Powell who, based on information on Companies House, has resigned since the declaration was made. Please provide the form F1 signed by a relevant person.

2. Missing Information

Your Measures to Demonstrate BAT document (October 2018) references Appendix 1 – Feedstock Acceptance Procedure, and Appendix 2 – New Supplier Assessment Form. These appendices are not present within our electronic version of the application, please submit a copy of the documents.

3. Management Plans and application fee

You have submitted a Noise and Vibration Management Plan however, the fee for our assessment of your plan is not included in your baseline application charge. You will therefore need to make an additional payment of £1,246.

Permitting and Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF
Customer Contact Centre: 03708 506 506
Email: enquiries@environment-agency.gov.uk
www.gov.uk/environment-agency

4. Most appropriate activity for the AD

The application waste list and non-technical summary indicates the AD plant could fall under different listed activity descriptions depending on the circumstances:

- 5.3 A(1)(a)(i) – if it accepts hazardous waste with a capacity exceeding 10 tonnes per day
- 5.4 A(1)(b)(i) – if it accepts non-hazardous waste with a capacity exceeding 100 tonnes per day (recovery only)
- 6.8 A(1)(c) – if it accepts animal carcasses or animal waste at a plant with a treatment capacity exceeding 10 tonnes per day

Where an activity can fall under more than one description, we objectively consider which is the “most apt” to the particular case. This is a matter of judgement and will depend on the relative proportions of animal waste and other waste feedstock. As such, I would be grateful if you could respond to the following questions:

1. What is the proportion of animal waste vs. non-animal waste (%) in a given day?
2. What is the estimated quantity of animal wastes vs. non-animal waste (tonnes) undergoing biological treatment at any one time in a given day?
3. What is the estimated quantity of hazardous waste (07 01 08*) to be treated via biological treatment in a given day? Answer should be in tonnes.
4. What is the estimated quantity of hazardous waste (07 01 08*) stored at any one time on site? Answer should be in tonnes.

Once we receive answers to the above questions, then we may ascertain what the most apt activity will be for this site.

Clarification on the above may impact on the application fee, so once resolved, if different to the fee assumed for the application we will discuss any difference in balance required to be paid or returned.

5. BAT Assessment

Your BAT assessment document Measures to Demonstrate BAT, October 2018 provides assessment against EA Technical Guidance Note ‘How to comply with your Environmental Permit. Additional Guidance for: Anaerobic Digestion’ (LIT 8737, v1.0 Nov 2013). The BAT assessment should also be completed against the relevant sections of the BATc for Waste Treatment (Commission Implementing Decision (EU) 2018/1147 of 10 August 2018). Please provide either an updated BAT assessment document or addendum to the BAT assessment document presenting how the facility will satisfy the requirements of the BATc.

Please send the information, quoting the above application reference, to:

Email address: psc@environment-agency.gov.uk.

Postal address:
Permitting and Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Please send the information and payment within 10 working days of this letter. Details of how to pay are given in Part F of the application form. If we don't hear from you, we must return your application.

When we receive the requested information and payment, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know by letter whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at:

<https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

If you have any questions please phone me on 02030251132 or email
Steven.Cooke2@environment-agency.gov.uk

Yours sincerely

Steve Cooke

Steven Cooke
Permitting Officer
NPS Installations