FRICTION ENERGY LTD

Environmental Management System

Application for Environmental Permit

St Margaret's Farm Composting and Biomass Boiler Facility, St Margaret's Road, Darenth, Dartford, DA4 9LB

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1 INTRODUCTION

1.1.1 This Environmental Management System (EMS) defines the environmental operations and activities to be undertaken by Friction Energy Limited ***(the Operator)*** at St Margaret's Farm, St Margaret's Road, Darenth, Dartford, DA4 9LB (***the Site)***. It also lists the proposed waste types and quantities to be accepted at the Site.

1.1.2 This EMS is submitted in support of an application for a bespoke Environmental Permit. The purpose of the application is to authorise:

- an open-air composting facility, which will process biodegradable green waste
- two biomass boilers, each with a thermal output of 980 KWth, which will burn virgin roundwood timber from tree surgeons and grounds maintenance contractors to produce heat for use in a converted grain store
- the receipt and processing of up to 5,200 tonnes per annum green waste and forestry wastes, falling under European Waste Catalogue Codes 02 01 03 'plant tissue wastes' and 02 01 07 'wastes from forestry'.

1.1.3 The Site will accept non-hazardous wastes only, no hazardous wastes will be received.

All waste storage and processing will take place on impermeable concrete surfacing, which drains, via a silt collection camber, to a storage lagoon with engineered basal and side wall low permeability liner. Clean run-off water from roofs and concrete areas not used for waste storage and processing or vehicle parking will drain to a separate lagoon for storage and use for fire-fighting (in the event of a fire incident) or irrigation of surrounding farm land. A sufficient reserve of fire fighting water will be maintained at all times to ensure compliance with the minimum storage requirement specified in the Fire Prevention Plan, which has been prepared to support the permit application.

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1.1.4 The operational area of the Site is surrounded by a mix of an earth bund and security fencing. The Site entrance will be secured by vehicular access gates. 24 hour CCTV will be installed and this will be monitored outside of operational hours with a call escalation for the Site Manager or other Technically Competent Person in the event of a break-in or fire incident. It should be noted that there are public rights of way [footpaths] across the Site and these will be maintained as safe access for pedestrians.

1.1.5 The Site has been designed to meet the requirements of the Environment Agency's 'Fire Prevention Plans: Environmental Permits https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits). Full details are included in the Fire Prevention Plan, which supports the application.

1.1.6 Drawing No P1 Site Location Plan shows the Environmental Permit boundary in green and location of the Site.

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1.1.7 No substances that would be classified as 'dangerous' under the Control of Major Accident Hazards (COMAH) Regulations will be used at the Site for the operation of the facility.

2 LIST OF PERMITTED WASTES

2.1.1 Permitted wastes are limited to those detailed in Table 1. The maximum annual waste throughput will be 5,200 tonnes.

2.1.2 All waste will be accepted in accordance with the Waste Acceptance Procedures detailed in this EMS (see below).

Table 1 Waste Feedstock

Waste Code	Description
02	**WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING**
02 01	**Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing**
02 01 03	plant-tissue waste
02 01 07	wastes from forestry

2.1.3 Wastes consisting entirely or mainly of dust, powder or loose fibres or in liquid form will not be accepted at the Site.

2.1.4 All waste received at the Site will be documented in accordance with all legal requirements including but not limited to the Environmental Permit and Duty of Care. Non-hazardous waste movements into and out of the Site are in accordance with Waste Transfer Note procedures.

3 WASTE ACCEPTANCE

3.1.1 All vehicles delivering wastes to the Site stop at the weighbridge and are weighed.

3.1.2 Checks will be made to establish whether the haulier is a Registered Waste Carrier or has a valid exemption from registration. Only registered carriers or those who are lawfully exempt from registration will be permitted to use the Site.

3.1.3 Waste will not be accepted if for any reason there is insufficient storage capacity available or if the Site is inadequately manned. This is to ensure that all waste is managed effectively to prevent pollution or loss of amenity.

3.1.4 Weighbridge staff will be suitably trained and will follow documented procedures. The weighbridge operator will examine waste descriptions at the weighbridge and the information will be checked against the pre-acceptance documentation, six figure European Waste Catalogue Code(s) and other details on the Waste Transfer Note or Season Ticket (as appropriate) and against the waste types permitted by the Environmental Permit.

3.1.5 Every delivery of waste will be recorded, detailing the date of the transaction, weight, waste type, registered carrier, Waste Transfer Note number, vehicle registration and other pertinent information against a unique reference number. It will allow for tracking of wastes, the generation of reports and waste returns, as well as providing comprehensive, auditable information.

3.1.6 A banksman will instruct lorry drivers to the appropriate tipping area within the Site for off-loading according to the type of waste being delivered to ensure materials are stored and processed correctly.

3.1.7 A visual inspection of the contents of all waste loads, including those received in sheeted or enclosed containers, will be made during deposit.

3.1.8 Any discrepancies found as a result of the checks detailed above will result in the vehicle being detained whilst some, or all, of the following supplementary management decisions are taken:

- Referral to a Technically Competent Person (TCP) on site;
- Referral to the waste producer to confirm the nature of the waste load;
- Referral to the waste carrier's base;
- Referral to the Environment Agency;
- Redirection of delivery vehicle off site, to a suitably authorised facility; and
- If the waste has been discharged on the floor, removal of the waste to the secure quarantine area, prior to off-site removal either to the waste producer or suitably authorised facility.

4 NON-CONFORMING WASTE

4.1.1 Any loads arriving at the Site which contain non-permitted wastes or a significant amount of contrary material will be rejected prior to unloading. In the unlikely event that a vehicle inadvertently deposits non-permitted waste or a large amount of contrary material, it will be re-loaded where possible. Where the vehicle has already left the Site, the non-permitted waste or contrary material will be stored in a quarantine skip on Site, pending removal of the material to the waste producer or authorised facility.

4.1.2 Material rejected from the Site shall be issued with a record stating why, when and from which contract the waste was provided. This record shall be held on Site for the Environment Agency to inspect. In addition, the 'Record of Non-Conformance', Appendix 2, shall be completed and the record will be held on Site.

4.1.3 Small amounts of contrary material present in loads shall be removed by hand or machine and temporarily stored in the quarantine skip. Material in quarantine shall be removed from Site to a suitably permitted facility, capable of dealing with the waste types, as soon as practicable.

4.1.4 In addition to non-conforming wastes, wastes which are malodorous or liquid shall not be accepted at the Site.

5 WASTE MANAGEMENT OPERATIONS

5.1 OPEN WINDROW COMPOSTING

5.1.1 Green waste deliveries will be deposited in the tipping area for storage and visual inspection. Any

roundwood/timber of adequate size within the green waste deliveries will be separated and transferred to a separate, dedicated storage area prior to separate chipping and combustion in the biomass boiler plant (see section 5.2 below).

5.1.2 Green waste will be stockpiled until up to 500 tonnes is available for shredding, where upon it will be shredded using a contract hire unit, which will be transported to the Site.

5.1.3 Shredded feedstock material will be transferred from the tipping and shredding area to a concrete composting pad situated on the eastern section of the Site, where it will be deposited and formed into windrows. Each windrow will be circa 4m wide and 3m in height.

5.1.4 Once a windrow is formed it takes 6 to 20-weeks for the composting process to complete. During this period the windrows will be mechanically turned using a windrow turner or similar in order to aerate the material and maintain optimum pore space for aerobic decomposition.

5.1.5 The specific frequency and duration of turning activities will depend on the age, temperature and moisture content of material. However, it is anticipated that turning operations will be undertaken weekly over the period of 1-working day. This is consistent with practices undertaken at other commercial composting facilities.

5.1.6 The windrows will be monitored to evaluate moisture content, temperature and oxygen levels. This will help to ensure that optimum conditions are maintained and that unmanaged decomposition of the material does not occur.

5.1.7 Material that has completed the windrow composting phase will be transferred to a separate section of the pad where it will be processed using a trommel screen. This will separate the material into fine grades and oversize fractions. As with shredding operations, this activity will only be undertaken once sufficient quantities are available for processing. It is proposed to utilise a contract hire unit for the operation which will be transported to the Site.

5.1.8 The fine grades will be transferred to a storage area and formed into piles prior to dispatch off-site. Oversize material will be transferred back to the tipping and shredding area, where it will be stored before it is re-shredded and incorporated back into the windrow composting process.

5.1.9 Finished compost will be transferred off-site via tractor in sheeted trailers to be spread to land in the farming estate. The material will be removed from the storage piles and loaded directly into the relevant dispatch vehicles.

5.2 BIOMASS BOILER PLANT

5.2.1 Deliveries of virgin timber and roundwood and materials separated from green waste deliveries will be stockpiled in a dedicated area of the Site and chipped using a shredder.

5.2.2 Shredded woodchip will be transferred to a converted grain store, where it will be dried to remove moisture before being be fed to the biomass boiler plant. Heat from the boilers will be used on Site to dry woodchip feedstock and grain grown at the farm. Additional heat will also be provided to others of the adjoining units within the farm complex.

5.2.3 The biomass boiler plant will comprise 2 No Froling Landamat 1Mw units, each with 980KWth output. Each boiler is fitted with a separate 7m high vent stack. The biomass boiler plant will be housed in a new steel frame barn type building. An Air Quality Assessment has been prepared for biomass boiler plant to support the permit application.

6 SITE DRAINAGE

6.1 SURFACE WATER RUN-OFF

6.1.1 All waste storage and processing areas comprise impermeable concrete surface.

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6.1.2 All surface water run-off from the waste storage and processing areas falls towards a trash screen protected drainage channel and into a silt collection chamber. From the silt collection chamber the water flows into a pump chamber via a high level weir with an incremental flow gate. The pump chamber lifts the water into a storage lagoon, which has a capacity of 1500m³. This lagoon has a fixed level overflow, which maintains levels in the lagoon at 50% of capacity, thereby storing 750m³ of water. The smaller lagoon overflow gravity falls to a second, larger lagoon, which as a capacity of 4,500m³. This larger lagoon separately receives clean run off water from building roofs and concrete areas that are not used for waste storage or processing or vehicle parking.

6.1.3 In the event that the smaller lagoon capacity falls below 750m³, e.g. during dry weather, a pumped water return system from the larger lagoon will be activated to ensure that levels of 750m³ are maintained. It is important to ensure 750m³ is maintained at all times, as this water would be used for fire-fighting in the event on an incident (see Fire Prevention Plan).

6.1.4 The silt settlement tank is normally kept empty by pumping into the first lagoon. The silt levels will be inspected weekly or after major rainfall events, and the silt excavated and removed as necessary to maintain the volume.

6.1.5 Water in the larger lagoon that does not require pumped return to the smaller lagoon will be used for dust suppression and farm irrigation, as it is sufficiently clean. It can also be used for additional fire water capacity if required.

6.1.6 The smaller 1,500m³ lagoon is effectively for the receipt of 'dirty' water, whereas the second larger 4,500m³ lagoon is for 'clean water'. The smaller lagoon will be engineered to include Geotextile underlay, with an overlying low permeability high density polyethylene (HDPE) liner to ensure that groundwater is suitably protected. Lagoon and drainage construction has been designed to meet CIRIA C733 Guidance.

6.2 FOUL DRAINAGE

6.2.1 The foul drainage will consist of domestic foul water from the farm office which will be discharged into a dedicated package treatment plant which will discharge clean water into the irrigation lagoon.

7 ENVIRONMENTAL MONITORING

7.1 BIOAEROSOL MONITORING

7.1.1 Boundary bioaerosol monitoring will be undertaken at the Site in accordance with Technical Guidance Note M9 'Environmental monitoring of bioaerosols at regulated facilities' (Environment Agency, July 2018, Version 2).

7.1.2 It is proposed that bioaerosol monitoring is undertaken at quarterly intervals during the first year of operation and thereafter every six months during the operational life of the Site. Samples will be analysed for *Aspergillus fumigatus* and total mesophilic bacteria in accordance with Technical Guidance Note M9.

7.2 BIOMASS BOILER EMISSIONS MONITORING

7.2.1 Enhanced pre-application advice was received from the Environment Agency on 24 July 2020. Based on the information provided, it is proposed that each biomass boiler is monitored every 3years for NOx gases and particulates, with Emission Limit Values set at 500 mg/m³ for NOx and 20 mg/m³ for particulate.

7.2.2 Technical Guidance Note M5 'Monitoring of stack gas emissions from medium combustion plants and specified generators' (Environment Agency, September 2018, Version 1) states that there are no SOx Emission Limit Values and reporting requirements for plants firing exclusively woody biomass fuel.

7.2.3 The monitoring will be undertaken by a MCERTS accredited company due to the requirement for particulate monitoring. Technical Guidance Note M5 states that due to the complexity of particulate monitoring it shall be carried out by an organisation with MCERTS accreditation for EN 13284-1.

7.2.4 Emissions monitoring will be undertaken by results and will be standardised to a dry gas, at standard temperature and pressure (273.15K and 101.3kPa) and 6% O_2 for solid fuels

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8 SITE RECORDS

8.1.1 The Site shall be managed by a Technically Competent Person in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016.

8.1.2 The Site records shall be maintained and kept secure from loss, damage and deterioration in either ~~a~~the Site office or secure location off-Site.

8.1.3 Records of Waste Transfer Notes, Registered Waste Carriers Certificates of all waste loads entering and leaving the Site shall be recorded on the 'General Waste Management' (Appendix 4) and Waste Returns will be produced in a timely manner.

8.1.4 A copy of the Environmental Permit shall be easily accessible by staff members or contractors. Contractors shall be briefed on the sensitivity of the Site and if not being supervised by Site personnel will require a Site induction.

8.1.5 Any complaints received at the Site shall be recorded on the 'Complaints Record' sheet, Appendix 5.

9 MAINTENANCE

9.1.1 All equipment and infrastructure on Site shall be inspected, serviced and maintained as per manufacturer guidance and 'Preventative Maintenance Checklist', refer to Appendix 6.

9.1.2 The Environment Agency shall be informed without delay if there is any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution and cause any significant adverse environmental and health effects.

9.1.3 Any required maintenance shall be carried out as soon as is practicable to ensure continued running of the facility and be recorded on the 'Maintenance Record', refer to Appendix 7.

9.1.4 Daily visual Site inspections for litter, dust and mud accumulating on Site or beyond the Site boundary shall be undertaken. More thorough weekly inspections will be carried out and recorded, 'Inspection Record', Appendix 8. The weekly inspections include a review of:

- Site road and impermeable pavements;
- Storage areas;
- Drainage system;
- Dust;
- Litter;
- Mud / dirt;
- Vermin and insects;
- Fire (e.g. inspection of firefighting equipment etc.); and
- Security.

9.1.5 Any maintenance works required shall be recorded on the 'Maintenance Record', Appendix 7.

10 ENVIRONMENTAL ACCIDENT AND INCIDENTS

10.1.1 An 'H1 Amenity and Accidents Risk Assessment' (Ref:-CE-SM-1813-RP02) has been prepared for the Site and submitted as part of the permit application.

10.1.2 In the event of an environmental accident on Site the 'Environmental Accident and Incident Record', Appendix 9, shall be completed and kept on Site.

11 TRAINING

11.1.1 The Site staff shall be trained and instructed in the procedures required to operate the Site and will be aware of the waste types accepted at the Site as well as relevant Environmental Permit and legislation as required.

11.1.2 The Site shall be manned and supervised at all times when waste operations are in progress.

11.1.3 A record of all training shall be kept on the 'Training Record' in accordance with the 'Training Needs Checklist'; Appendix 10 and Appendix 11 respectively.

12 COMPLAINTS

12.1.1 Any complaints received at the Site, e.g. about noise or dust, will be reported to the Site Manager or Technically Competent Person (with appropriate WAMITAB Certificate) who is responsible for the site management, e.g. in the absence of the Site Manager due to illness or annual leave etc.

12.1.2 The following actions will be taken on receipt of an external complaint:

- The responsible person receiving the complaint at the Site will immediately record the key details, initiating the investigation process. Details will be entered on the Complaint Report Form (see Appendix 5). The form sets out the key information that should be recorded at this time in order to facilitate further suitable investigation.
- The Site Manager or other Technically Competent Person will be informed of the complaint as soon as possible, including the location, time and date of the complaint being lodged (where available).

12.1.3 In recognising that some causes of complaints, such as dust and noise, can be transient and short-lived, timely notification of complaints directly from the complainant or the Environment Agency is imperative to allow for appropriate investigation. If the complaint occurs more than 12 hours before notification is provided to the Operator, it may not be possible to substantiate the complaint or pinpoint the cause. The Operator will, however, contact the complainant where possible, review any operations at the time which had the potential to cause the complaint and complete and record a comprehensive complaint investigation. For complaints received within 12 hours of the incident the following actions will be undertaken:

- The Site Manager or other Technically Competent Person will visit the complaint location as soon as possible, with the aim of undertaking monitoring within 2 hours if this is possible within the working day. The Site Manager or other Technically Competent Person will subjectively determine the presence or absence of the cause of the complaint, e.g. visible dust presence or source and level of noise. Opportunities to meet the complainant to discuss the matter directly will be pursued, wherever possible.
- If the cause of complaint, e.g. visible dust or noise, is present, the key 'FIDOR' criteria will be assessed at the complaint location, as follows:
    - Frequency – is the cause of the complaint, e.g. dust or noise, intermittent or persistent; is there a history of complaints at this location?
    - Intensity – is the cause of complaint faint, moderate, strong, or very strong?
    - Duration – how long is the cause of complaint present at this location?
    - Offensiveness – provide a description of the cause of complaint; is it high, moderate,

or low offensiveness?

- Receptor sensitivity - is the cause of complaint present at a remote or highly sensitive location; is it localised or widespread?

12.1.4 The Site Manager or other Technically Competent Person will subsequently undertake the following further assessment process:

- Review of the operations at the Site prior to and at the time of the complaint;
- Review of the environmental control systems prior to and at the time of the complaint;
- Review of the meteorological conditions (wind speed, wind direction, rainfall, atmospheric pressure) prior to and at the time of the complaint – to establish whether a pathway can be established between the Site and the complainant;
- Review of the previous complaint history at the location identified.

12.1.5 Where a significant complaint is substantiated by the Site Manager or other Technically Competent Person, the Operator will contact the Environment Agency to discuss the incident as soon as possible following receipt of the complaint details, allowing sufficient time for the above investigation to be completed, and within a maximum target response period of 24 hours from complaint receipt. If the necessary contact details are available and direct feedback has been requested the Operator will also contact the complainant directly to discuss the issue, the findings of the subsequent investigation, and any actions arising.

12.1.6 Once actions have been completed the Site Manager or other Technically Competent Person will visit the complaint location to ensure that the cause of complaint has subsided.

13 SITE DIARY

13.1.1 A Site diary consisting of accurate and complete reporting and record keeping shall be maintained at the Site office at all times and will be made available for inspection by the Environment Agency when requested.

14 AUDITS

14.1.1 It is noted that this EMS is required to be:

- Continually improving;
- Assessing prevention of pollution incidents;
- In accordance with the latest regulatory guidance; and
- Assessing environmental objectives independent of the Environmental Permit.

14.1.2 To assess the bullet points the operator shall undertake internal annual audits of the Environmental Management System, environmental performance, objective and targets and future planned improvements.

APPENDICES:

Appendix 1	Drawing No
Appendix 2	Record of Non-conformance
Appendix 3	WAMITAB
Appendix 4	General Waste Management
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APPENDIX 1

Drawing No

APPENDIX 2:

Record of Non-conformance

Record of non-conformance	
Date and time non-conformance identified	
What happened, what was it about?	
What caused it?	
What have you done to make sure that it does not happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify the Environment Agency. Have you done so?	Yes/No/not applicable Time: Date: EA Incident number:
Please print name and sign:	

APPENDIX 3:

WAMITAB

APPENDIX 4:

General Waste Management

General Waste Management – Waste Received on Site							
Date	**Origin**	**EWC Code**	**Disposal or Recovery Code**	**State** *(solid, liquid)*	**From another waste facility?**	**Amount** (tonnes)	**Comments**

APPENDIX 5:

Complaints Record

Complaints Record	
Who made the complaint?	
Name:	
Address:	
Phone No:	
Date and time of complaint	
What caused it?	
Was anyone else aware of this? If so who	
What was the source of the problem, what went wrong? If source is unknown contact a suitably qualified person to investigate.	
What have you done to make sure it won't happen again?	
Was there any significant pollution – for example oil entering a surface water drain?	
If there was then you must notify the EA Have you done so? You must also notify the local EA Office via email or letter.	Yes/No/not applicable Date and Time: EA Incident number:
Please print name and sign:	

APPENDIX 6:

Preventative Maintenance Checklist

Preventative Maintenance Checklist									
Item requiring maintenance	**How often? (tick the appropriate box)**						**Where are maintenance instructions**	**Who is responsible?**
	Day	**Week**	**Month**	**Year**	**2 years**	**5 years**		

APPENDIX 7:

Maintenance Record

Maintenance Record		
Item*[1] :		**Due*[2]:**
Completed on	**Completed by**	**Comments**
e.g. 13/02/~~2013~~	*A. Person*	*Blockage in drainage system. Blockage removed.*
**[1] Item e.g. inspect fences, inspect drainage system* **[2] Due e.g. weekly, daily*		

APPENDIX 8:

Site Inspection Record

Site Inspection Record			
Date	**Item**	**Inspected (yes/no)**	**Comments**
	Site road and Operational Area		
	Storage areas		
	Drainage system		
	Litter		
	Mud/dirt		
	Vermin and insects		
	Fire (fire-fighting equipment)		
	Security		

APPENDIX 9:

Environmental Accident and Incident Record

Environmental Accident and Incident Record	
Date and time of the incident	
What happened, what was it about?	
Was anyone else aware of this – other witnesses? If so who?	
What caused it?	
What action did you take to fix the problem? Were external agencies involved?	
What have you done to make sure that it does not happen again?	
If there was then you must notify the Environment Agency. Have you done so?	Yes/No/not applicable Time: Date: EA Incident number:
Please print name and sign:	

APPENDIX 10:

Training Record

Training Record							
Employee Name				**Job Title**			
Training Required	**Date Due**	**Date Done**	**Passed as competent? (yes/no)**	**Reviewers signature**	**Date of refresher**	**Comments**	

APPENDIX 11:

Training Needs Checklist

Training Needs Checklist																
Employee	**Training Required***															**Comments**
	Environmental Awareness					**Maintenance / Operations**					**Accidents and Emergency**					
	Permit role and responsibility	Waste Receipt including Duty of Care	Waste treatment and storage	Awareness of local sensitive receptors	Permit conditions and non-confirmances	Maintenance of screener	Maintenance of shredder	Bunds, tanks, pipework			Fire	Spill response	Failure of Services	Dust emissions		

**Insert other training required in available spaces.*