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Portland Energy Recovery Facility



Powerfuel Portland Limited

Supporting Information – EP Variation

Document approval

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1 Introduction

Powerfuel Portland Limited (herein referred to as Powerfuel) is proposing to construct and operate the Portland Energy Recovery Facility (the Facility) at a site within Portland Port on the Isle of Portland, Dorset, DT5 1PP.

The Facility will incinerate a combination of refuse derived fuel (RDF) produced from domestic (municipal solid waste) and commercial & industrial (C&I) non-hazardous waste.

An Environmental Permit (EP) for the operation of the Facility was granted on 26 February 2025 (Ref: EPR/AP3304SZ). Within this application, Powerfuel is applying for a variation to the EP to allow for the processing of a wider range of European Waste Catalogue (EWC) codes within the waste incineration process.

1.1 Type of Variation

The Environment Agency's guidance on Charging Schemes states that there are four types of variations – administrative, minor technical, normal and substantial.

The Environment Agency has published guidance (Environmental permits: when and how you are charged) which defines a minor technical variation. For waste and installations, the guidance defines a minor technical variation as applicable if you want to:

'A minor variation is one that:

- needs some assessment by the Environment Agency – but much less than for a normal variation*
- does not need external consultation'*

An example that the Environment Agency gives of such a variation is:

'where you propose to change the list of wastes your permit allows your facility to accept. This is only appropriate where:

- there is no increase in risk to the environment*
- there is no change in activity*
- the change does not require you to resubmit a site-specific plan for assessment – for example a fire prevention, odour or emissions management plan'*

The published guidance also defines normal variations, for waste and installations:

'A normal variation is one which will need input by the Environment Agency but is not a minor variation or substantial variation'

As presented in section 2, the additional waste types will not result in an increased risk to the environment, change to the currently permitted activity, or require a resubmission of a site-specific plan for assessment. However, due to the Facility being of High Public Interest, the Environment Agency has advised that it will require Powerfuel to submit the application as a normal variation. This is reflected in the application fee paid and the application forms.

2 Additional waste types

The additional waste streams which Powerfuel propose to treat within the Facility are presented in Table 1.

Table 1: Additional EWC Codes for Treatment

EWC Code	Description of Waste	Justification
WASTES FROM AGRICULTURE, HORTICULTURE, AQUACULTURE, FORESTRY, HUNTING AND FISHING, FOOD PREPARATION AND PROCESSING		
<i>wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing</i>		
02 01 03	plant-tissue waste	In accordance with the waste hierarchy, these wastes will normally be transferred for recovery and/or treatment in a suitable processing facility such as for composting or an anaerobic digestion plant. However, if the materials are deemed to be contaminated or otherwise unsuitable for reprocessing, an alternative waste management solution will be required. The Facility will aim to provide that solution to avoid the wastes otherwise being diverted to landfill. These wastes will not inherently be odorous. It is understood that these wastes would be biomass wastes and suitable for combustion. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration.
02 01 04	waste plastics (except packaging)	
02 01 07	wastes from forestry	
02 01 09	agrochemical waste other than those mentioned in 02 01 08	
<i>wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation</i>		
02 03 04	materials unsuitable for consumption or processing	In accordance with the waste hierarchy, these wastes will normally be transferred for recovery and/or treatment in a suitable processing facility such as for composting or an anaerobic digestion plant. However, if the materials are deemed to be contaminated or otherwise unsuitable for reprocessing, an alternative waste management solution will be required. The Facility will aim to provide that solution to avoid the wastes otherwise being diverted to landfill. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
<i>wastes from the dairy products industry</i>		
02 05 01	materials unsuitable for consumption or processing	
<i>wastes from the baking and confectionery industry</i>		
02 06 01	materials unsuitable for consumption or processing	
02 06 02	wastes from preserving agents	

EWC Code	Description of Waste	Justification
		The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.
WASTES FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD		
<i>wastes from wood processing and the production of panels and furniture</i>		
03 01 01	waste bark and wood	These wastes will not inherently be odorous. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04	
WASTE FROM WOOD PROCESSING AND THE PRODUCTION OF PANELS AND FURNITURE, PULP, PAPER AND CARDBOARD		
<i>Wastes from pulp, paper and cardboard production and processing</i>		
03 03 01	Waste bark and wood	In accordance with the waste hierarchy, these wastes will normally be transferred for recovery and/or treatment in a suitable processing facility. However, if the materials are deemed to be contaminated or otherwise unsuitable for reprocessing, in an alternative waste management solution will be required. The Facility will aim to provide that solution to avoid the wastes otherwise being diverted to landfill. These wastes will not inherently be odorous. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
03 03 07	Mechanically separated rejects and pulping of waste paper and cardboard	
03 03 08	Waste from sorting of paper and cardboard destined for recycling	
WASTES FROM THE LEATHER, FUR AND TEXTILES INDUSTRIES		
<i>Wastes from the textiles industry</i>		
04 02 09	Wastes from composite materials, (impregnated textile, elastomer, plastomer)	The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate. These wastes will not inherently be odorous.
04 02 10	Organic matter from natural products (for example grease, wax)	

EWC Code	Description of Waste	Justification
04 02 21	Wastes from unprocessed fibres	As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
04 02 22	Wastes from processed fibres	
WASTES FROM ORGANIC CHEMICAL PROCESSES		
<i>wastes from the MFSU of plastics, synthetic rubber and man-made fibres</i>		
07 02 13	waste plastic	<p>These wastes will not inherently be odorous. The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p>
WASTES FROM THE PHOTOGRAPHIC INDUSTRY		
<i>wastes from the photographic industry</i>		
09 01 07	photographic film and paper containing silver or silver compounds	<p>These wastes will not inherently be odorous. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
09 01 08	photographic film and paper free of silver or silver compounds	
09 01 10	single-use cameras without batteries	
WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS		
<i>wastes from shaping and physical and mechanical surface treatment of metals and plastics</i>		
12 01 05	plastics shavings and turnings	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>These wastes will not inherently be odorous. The fuel feed will be within the capability of the flue gas treatment system to maintain emissions</p>

EWC Code	Description of Waste	Justification
		from the Facility within the limits stated in the EP. As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED		
Packaging (excluding separately collected municipal packaging waste)		
15 01 01	Paper and cardboard packaging (which is contaminated and not suitable for recycling)	The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate. These wastes will not inherently be odorous. The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP. As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
15 01 02	Plastic packaging (which is contaminated and not suitable for recycling)	
15 01 03	Wooden packaging	
15 01 05	Composite packaging	
15 01 06	Mixed packaging	
15 01 09	Textile packaging	
Absorbents, filter materials, wiping cloths and protective clothing		
15 02 03	Absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02	The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate. These wastes will not inherently be odorous. The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP. As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.
WASTES NOT OTHERWISE SPECIFIED IN THE LIST		
End-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)		
16 01 19	plastic	The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form

EWC Code	Description of Waste	Justification
		<p>a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>These wastes will not inherently be odorous.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)		
Wood, glass and plastic		
17 02 01	Wood	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>These wastes will not inherently be odorous.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
17 02 03	Plastic (which is contaminated and not suitable for recycling)	
17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	
WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE		
wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)		
19 02 03	Premixed wastes composed only of non-hazardous waste	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology.</p> <p>Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not</p>
19 02 10	Combustible wastes other than those mentioned in 19 02 08 and 19 02 09	

EWC Code	Description of Waste	Justification
		significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.
stabilised/solidified wastes		
19 03 05	stabilised wastes other than those mentioned in 19 03 04	The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology. Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.
19 03 07	solidified wastes other than those mentioned in 19 03 06	
Wastes from aerobic treatment of solid waste		
19 05 01	Non-composted fraction of municipal and similar wastes	In accordance with the waste hierarchy, these wastes will normally be transferred for recovery and/or treatment in a suitable processing facility such as for composting or an anaerobic digestion plant. However, if the materials are deemed to be contaminated or otherwise unsuitable for reprocessing, an alternative waste management solution will be required. The Facility will aim to provide that solution to avoid the wastes otherwise being diverted to landfill. It is understood that these wastes would be biomass wastes and suitable for combustion. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. As such, the proposed additional waste codes will not significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours
19 05 02	Non-composted fraction of animal and vegetable waste	
19 05 03	Off specification compost	

EWC Code	Description of Waste	Justification
		associated with the storage and handling of these wastes are described in section 3.4.
<i>wastes from anaerobic treatment of waste</i>		
19 06 04	digestate from anaerobic treatment of municipal waste	The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. The digestate may need to be dewatered to reduce its moisture content and make it suitable for handling prior to transfer to the Facility. These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology. Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.
19 06 06	digestate from anaerobic treatment of animal and vegetable waste	
<i>wastes from waste water treatment plants not otherwise specified</i>		
19 08 01	screenings	The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology. Taking the above into consideration, Powerfuel considers that the EWC code is suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.
<i>wastes from shredding of metal-containing wastes</i>		
19 10 04	fluff-light fraction and dust other than those mentioned in 19 10 03	The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. These EWC codes have been accepted as being suitable

EWG Code	Description of Waste	Justification
		<p>for incineration and is included in permits for other waste incineration facilities employing moving grate technology.</p> <p>These wastes will not inherently be odorous.</p> <p>Taking the above into consideration, Powerfuel considers that the EWG code is suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
<i>Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</i>		
19 12 01	Paper and cardboard (which is contaminated and not suitable for recycling)	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>These wastes will not inherently be odorous.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
19 12 04	Plastic and rubber (which is contaminated and not suitable for recycling)	
19 12 07	Wood other than that mentioned in 19 12 06	
19 12 08	Textiles	
19 12 10	Combustible waste (refuse derived fuel)	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p> <p>The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.</p>
19 12 12	Other wastes (including mixtures of materials from mechanical treatment of wastes other than those mentioned in 19 12 11)	

EWC Code	Description of Waste	Justification
MSWS (HOUSEHOLD WASTE AND SIMILAR COMMERCIAL, INDUSTRIAL AND INSTITUTIONAL WASTES) INCLUDING SEPARATELY COLLECTED FRACTIONS		
<i>Separately collected fractions (except 15 01)</i>		
20 01 01	Paper and cardboard (which is contaminated and not suitable for recycling)	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate. These wastes will not inherently be odorous. The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
20 01 08	Biodegradable kitchen and canteen waste	<p>The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology. Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.</p>
20 01 10	Clothes	<p>The wastes would be contaminated and not suitable for recycling. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate. These wastes will not inherently be odorous. The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly</p>
20 01 11	Textiles	

EWC Code	Description of Waste	Justification
		alter the currently permitted waste acceptance, handling and storage requirements.
20 01 25	Edible oil and fat	<p>These waste will be delivered to the Facility in small containers. As part of the waste acceptance procedures for the Facility they will only be accepted if the containers are not damaged.</p> <p>These waste will transferred directly into the bunker for processing.</p> <p>These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology.</p> <p>These wastes will not inherently be odorous.</p> <p>Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
20 01 28	Paints, inks, adhesives and resins other than those mentioned in 20 01 27	
20 01 30	Detergents other than those mentioned in 20 01 29	
20 01 32	Medicines other than those mentioned in 20 01 31	
20 01 36	Discarded electrical and electronic equipment other than those mentioned in 20 01 21, 20 01 23 and 20 01 35	<p>The waste will be mixed with the rest of the waste in the bunker to ensure that it is suitable for incineration. These EWC codes have been accepted as being suitable for incineration and is included in permits for other waste incineration facilities employing moving grate technology.</p> <p>These wastes will not inherently be odorous.</p> <p>Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
20 01 38	Wood other than that mentioned in 20 01 37	
20 01 39	Plastics (which are contaminated and not suitable for recycling)	<p>The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration/combustion on a moving grate.</p> <p>The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the EP.</p> <p>These wastes will not inherently be odorous.</p> <p>As such, it is understood that these wastes are suitable for combustion and will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>

EWC Code	Description of Waste	Justification
<i>Garden and park wastes (including cemetery waste)</i>		
20 02 01	Biodegradable wastes	<p>In accordance with the waste hierarchy, these wastes will normally be transferred for recovery and/or treatment in a suitable processing facility such as for composting or an anaerobic digestion plant. However, if the materials are deemed to be contaminated or otherwise unsuitable for reprocessing, an alternative waste management solution will be required. The Facility will aim to provide that solution to avoid the wastes otherwise being diverted to landfill.</p> <p>It is understood that these wastes would be biomass wastes and suitable for combustion. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. As such, the proposed additional waste codes will not significantly alter the currently permitted waste acceptance, handling and storage requirements. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.</p>
20 02 03	Other non-biodegradable wastes	<p>In accordance with the waste hierarchy, these wastes will normally be transferred for recovery and/or treatment in a suitable processing facility such as for composting or an anaerobic digestion plant. However, if the materials are deemed to be contaminated or otherwise unsuitable for reprocessing, an alternative waste management solution will be required. The Facility will aim to provide that solution to avoid the wastes otherwise being diverted to landfill.</p> <p>These wastes are not inherently odorous. The waste will be mixed with the rest of the waste in the bunker to form a relatively homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. As such, the proposed additional waste codes will not significantly alter the currently permitted waste acceptance, handling and storage requirements.</p>
<i>Other MSWs</i>		
20 03 01	Mixed MSW	The waste will be mixed with the rest of the waste in the bunker to form a relatively
20 03 02	Waste from markets	

EWC Code	Description of Waste	Justification
20 03 03	Street cleaning residues	homogenous fuel feed to the furnace and therefore ensure that it is suitable for incineration. The fuel feed will be within the capability of the flue gas treatment system to maintain emissions from the Facility within the limits stated in the Environmental Permit. Taking the above into consideration, Powerfuel considers that the EWC codes listed are suitable for combustion on a moving grate and will not significantly alter the currently permitted waste acceptance, handling and storage requirements. Powerfuel anticipates that the quantity of waste received at the Facility under these EWC codes will be small compared to the other wastes processed at the Facility. Waste acceptance procedures will be developed for all incoming wastes. It is the responsibility of the Facility management to ensure that odour control can and is maintained. If odour control cannot be maintained due to the nature of the waste, the waste will not be accepted at the Facility. The controls which have been incorporated into the design of the Facility to mitigate any odours associated with the storage and handling of these wastes are described in section 3.4.
20 03 06	Waste from sewage cleaning	
20 03 07	Bulky waste	

The Facility is currently permitted to incinerate refuse derived fuel (RDF) produced from domestic (municipal solid waste) and commercial & industrial (C&I) non-hazardous waste.

As presented in Table 1, the additional wastes types are all classified as non-hazardous wastes, and are considered to be 'similar wastes' to those currently to be received and processed at the Facility because the wastes are also derived from domestic and commercial & industrial sources.

Overall, the waste codes being proposed will not significantly alter the currently permitted waste acceptance, handling and storage arrangements. The additional waste codes are considered under the waste hierarchy and will only be accepted if they cannot be recycled or reused. Additional EWC codes will not change the waste storage capacity at the Facility, and no changes to the waste infrastructure will be required to facilitate the processing of the additional waste types.

Powerfuel does not consider that the additional EWC codes will change the fire risk associated with the operation of the Facility. As per the pre-operational conditions of the EP, will submit a full waste acceptance procedure prior to the commencement of commissioning of the Facility, and a revised Fire Prevention Plan. Waste acceptance procedures will account for the existing EP condition that separately collected fractions (such as those listed under 20 01 codes) are not be accepted unless they are unsuitable for recovery by recycling.

3 Environmental Risk Assessment

The Facility has been designed to comply with the requirements of Chapter IV of the Industrial Emissions Directive, so it is not considered that incinerating wastes covered by these additional non-hazardous EWC codes will change the impact of the ERF upon the receiving environment. On this basis, these additional waste codes will not introduce any additional 'environmental risks', and there will be no additional requirements to receive or process these additional EWC codes.

3.1 Raw material consumption

Raw material use is not anticipated to be change due to the processing of the additional waste types.

3.2 Residue generation

The nature of the additional waste types will be similar to RDF, and the quantities of residues (bottom ash and Air Pollution Control Residue) are expected to not significantly change or present greater environment and human health risk. Further mitigation measures for the handling, recovery and disposal of residues are not necessary.

3.3 Fire

The nature of the proposed additional waste, in terms of risk of combustion, is comparable to RDF. The quantity and storage infrastructure will not be changed. Therefore, the general fire prevention measures within the current Fire Prevention Plan (as provided for the current EP decision) remain applicable. A Fire Prevention Plan is not submitted with this application as it is intended the EWC codes will be updated when discharging Pre-operational condition (PO10) for the approval of the Fire Prevention Plan prior to commissioning.

3.4 Odour

The controls for odour management at the Facility are set out within the Odour Management Plan (Ref: S2953-0320-0013JRS - Odour Mitigation Note r1), which is referenced within the operational techniques (Table S1.2 of the EP). The general nature of the additional waste types is similar to RDF and the maximum quantities of waste stored is not increasing. The measures detailed in the Odour Management Plan will also be applicable to the additional waste types, namely:

1. Incoming waste will be stored within a dedicated indoor waste reception and storage area.
2. The waste reception and storage area and all incoming waste handling activities will be undertaken within a fully enclosed building, at a negative pressure.
3. Under normal operation, potentially odorous air from waste storage areas will be combusted as 'combustion air' within the waste incineration process.

Overall, the above controls for the proposed additional types of waste generated from municipal, commercial and industrial sources are considered to represent BAT for the abatement of odour.

3.5 Noise

Noise management is addressed through the 'Section 5.1 Noise mitigation methods, of Portland Energy Recovery Facility BS4142 Noise Impact Assessment, AAC/267701/R04', which is part of the current EP's operational techniques.

The variation will not result in changes in use of machinery, or the operational hours of potential sources of noise identified in the Impact Assessment (stack, boiler room and turbine hall). Therefore, the Noise Impact Assessment, AAC/267701/R04, is considered to be suitable for the process of the additional waste types.

3.6 Air quality and human health

The primary pathway to sensitive human receptors is through air from stack emissions. The specifications of the sources of emissions to air (incinerator stack and back-up electrical generator) and the operational hours will not change. Therefore, the assessment and conclusion of the Dispersion Modelling Assessment submitted in support of the original application is considered to be suitable for the process of the additional waste types.

The requested additional waste codes include wastes that may contain Persistent Organic Pollutants (POPs), such as waste electrical and electronic equipment (WEEE) and upholstered bulky waste (primarily soft furnishings with fire retardant materials). Incineration is a recognised method for destroying POPs, and the EP has set limits and monitoring requirements to ensure any release of unintentionally-produced POPs is appropriately managed.

As per the pre-operational conditions of the EP, a full waste acceptance procedure prior to the commencement of commissioning of the Facility will be prepared and will address POP containing wastes. Bulky waste that contains POPs will be required to be described within Waste Transfer Notes as EWC code 20 03 07 with a further description of 'domestic seating waste containing POPs', as per Environment Agency guidance titled, '*Manage waste upholstered domestic seating containing POPs*'. For WEEE, the classification of such wastes will be required to be in line with the WM3 and Environment Agency guidance titled, '*Classify some waste electrical devices and components, and wastes from their treatment*' to ensure no hazardous waste containing POPs is accepted to the Facility.

3.7 Litter, mud, debris and dust

Some fractions of proposed additional waste may be dusty in nature, such as off specification compost, shredding of metal-containing wastes, sawdust, wood shavings. Delivery of wastes will be in sealed containers and handling of waste for movement across the Facility will be kept to a minimum. All incoming waste will be delivered and stored within the enclosed Waste Reception Area. Good housekeeping will be maintained, and daily inspection to identify any deposits of dust to be removed as soon as practicable.

A dust management plan has not been developed for this application because the existing measures for preventing litter, mud, debris and dust across the Facility and beyond the permit boundary remain suitable.

3.8 Habitats

The primary pathway to ecological sensitive receptors is through air from stack emissions. As explained in section 3.6, the Dispersion Modelling Assessment submitted in support of the original application is considered to be suitable for the process of the additional waste types.

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