

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Mr Giles Frampton
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45 King William Street
London
EC4R 9AN

Application number: EPR/AP3304SZ/A001

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 18th May 2021.

Send the information to either the email or postal address below by 3rd December 2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

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

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

Name	Date
Senior Permitting Officer	04/11/2021

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Schedule

1. Please clarify the height of the proposed Portland ERF stack.

There is inconsistency on this point within the submitted permit application documents, for example, the Non-Technical Summary and the Supporting Information document refer to a proposed stack height of 90 metres, whereas the Air Quality assessment is based on a stack height of 80 metres.

2. With regard to the submitted air quality modelling of emissions from the proposed Portland ERF stack please quantify and comment on the modelling uncertainties, re-evaluating predictions (including the use of alternative-modelling software as appropriate) and re-interpret predicted impacts in accordance with our guidance at [Environmental permitting: air dispersion modelling reports - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/344242/Environmental_permitting_-_air_dispersal_modelling_reports_-_GOV.UK.pdf)

Software validation documents, the Environment Agency's own check modelling, sensitivity analysis, and interpretation of uncertainties indicate that the applicant's predictions are likely to underestimate potential impacts at sensitive receptors. As a result of our audit, we found that the applicant's conclusions cannot be used for permit determination.

3. Please provide the following information with regard to the operation of the proposed emergency standby diesel generator:
 - a) a technical description of the operation of the activity (including estimated maximum annual operating hours and input thermal capacity) and a demonstration of how you will meet relevant Best Available Techniques (BAT). This should also include details of operating techniques and the infrastructure proposed to minimise the risk of pollution, including any details of secondary containment (e.g. bunds) used and how this meets any relevant standards.

The permit application provides minimal technical information about the proposed emergency standby diesel generator. It is stated that the purpose of the generator is to provide sufficient power to run or shut the plant down in the event of the loss of a grid connection, and that otherwise it would only be expected to operate for short-term periods for testing purposes.

Please note, the Environment Agency has recently set out to Energy UK the BAT expectations for new emergency standby diesel generators within IED permits (Chapter II permits, either as DAAs or part of a combustion activity aggregation). Applicants are expected to specify new emergency standby diesel generators according to BAT, which includes:

- *Emission levels equivalent to TA-Luft 2g standard, or US EPA Tier 2*
- *Vertical stacks with no caps/cowls impediments*
- *No persistent dark smoke.*

- b) an air quality assessment which considers the impact of operating the proposed emergency standby diesel generator (using dispersion modelling as appropriate) on sensitive human and ecological receptors respectively.

The permit application does not consider the impact of emissions from the standby generator. Your assessment should consider the potential impacts of total emissions from the site under likely worst case operational scenarios (i.e. testing and emergency), for example, consider if the standby generator would be run at the same time as the waste incineration activity as this would increase potential impacts at receptors. You must also consider the maximum worst case timeframe that you could be operating the standby generator for, based on the site specific

factors. You will need to include a clear justification as to why you have selected that particular timeframe.

4. Please review the originally submitted permit application documents and provide updated and/or supplementary information (as appropriate) to ensure that any information submitted to the local planning authority (LPA) in response to their letter requesting additional information dated 30/04/2021, ref. WP/20/00692/DCC, where that information is also relevant to the environmental permit application, is submitted in support of the permit application.

You must ensure that your response clearly indicates the information which you consider relevant for the permit application, thereby distinguishing it from information submitted to the LPA which is outside of the Environment Agency's environmental permitting remit.

The Environment Agency is aware that information that would be relevant to the environmental permit application has been submitted by the Applicant in the aforementioned response to the LPA. This information should also be submitted to the Agency for consideration during our determination of the permit application.