

# Notice of request for more information

## The Environmental Permitting (England & Wales) Regulations 2016

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**Company Director**

**Eco-Power Environmental (Hull) Ltd**

**Bankwood Lane Industrial Estate**

**Bankwood Lane**

**Rossington**

**Doncaster**

**South Yorkshire**

**DN11 0PS**

Application number: EPR/MP3107PP/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 21<sup>st</sup> October 2020.

Send the information to either the email or postal address below by 18/02/2022. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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](mailto:psc@environment-agency.gov.uk).

Postal address:

Permitting and Support Centre

Quadrant 2

99 Parkway Avenue

Parkway Business Park

Sheffield

S9 4WF

Name	Date
Matthew Woollin	08/12/2021

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 third notice on the issues covered in this notice in relation to odour and emissions management. This is the second notice in relation to the issues covered in this notice in relation to noise management.

## Schedule

### **Odour Management Plan (OMP) – schedule 5 response dated 14<sup>th</sup> October 2021**

For the proposed activity enclosing activities within buildings would be an appropriate measure for preventing and minimising emissions of pollution, given that an appropriately designed building will reduce a range of types of pollutants, in particular, noise, dust and odour. The air inside the enclosed building must be maintained under negative pressure, or you must install a localised extraction system that extracts dirty air from sources of pollution within the building.

Enclosed buildings must be ventilated to provide a safe working environment for employees. Your building's ventilation system must be properly designed and effective in order for the building to provide adequate containment and prevent fugitive emissions and unacceptable noise. You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system (usually a combination of abatement techniques) for treatment before release.

#### **See guidance on appropriate measures:**

[www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities](http://www.gov.uk/guidance/non-hazardous-and-inert-waste-appropriate-measures-for-permitted-facilities)

#### **See explanation of BAT:**

<https://eippcb.jrc.ec.europa.eu/reference/waste-treatment-0>

1. How were the proposed air extraction rates derived and how does this relate to the capacity of the building, answers should respond as a minimum to the points given here.

*Reason: We would expect to see a clear rationale behind the air extraction rate and building capacity i.e. what is the building volume and how does this relate to air changes per hour under different extraction scenarios namely:*

- *The dust extraction system is connected to the areas of the treatment shed where we would expect to see maximum odour potential. Other than dust being removed from the extracted air there is no proposal to treat to reduce odour therefore the dust extraction system is a potential odour source. This would be exacerbated during dry periods when waste will need less drying and therefore the dust extraction system would be the primary means of maintaining negative pressure.*
  - *It is not clear when the dust extraction system will be in use i.e. if it is only during active waste treatment then when waste is stored but not being treated the extraction system may not be in use and the building will not be under negative pressure (such as during the night).*
2. As the negative pressure system relies in part on extraction of air for use in the biomass boilers what happens if there is no or minimal drying taking place? Answers should as a minimum respond to the points given here.

*Reason: Impacts of reliance on the use of extracting air using the biomass boilers include:*

- *Shed not always under negative pressure i.e. waste processing can take place without the biomass boilers being in use?*

- Waste will tend to be drier in summer resulting in less need to dry/use biomass boilers therefore peak odour potential coincides with those times when drying will be at a minimum;
- The schedule 5 response (14<sup>th</sup> October 2021) assumes that all 41 boilers will be in use to provide negative pressure whereas the air quality modelling assumes 35 boilers will be a normal operation scenario;
- Reliance on the use of the biomass boilers to treat odorous air could mean that the boilers are used when there is no demand for heat for drying, this would not be an efficient use of energy/resources;
- What happens when the site is closed i.e. as waste processing doesn't take place out of hours then the drying line/boilers will not be in use but waste may be present in the treatment shed without air extraction taking place i.e. not under negative pressure?

3. How is the biomass boiler room connected to main shed?

Reason: For maximum benefit for odour control the air intakes for the boiler room would be over the waste reception/initial treatment areas.

4. How do you control air intake into the reception shed?

Reason: To maximise boiler efficiency you need to ensure a consistent supply of air, if the air is provided from the treatment shed how can this be controlled if the doors are closed?

The SRF pellet cooling system has an extraction rate (assuming cooling is taking place) of 40,000m<sup>3</sup>/hr. Provide a response to the points given here:

- What consideration has been given to this extraction system acting as an odour source?
- How would negative pressure in this area of the shed interact with the other air extraction methods?

Reason: A number of extraction systems are described some of which could act as odour sources and interact resulting in unplanned consequences by impacting on each other.

5. Provide further details as to how the site will be managed so as to ensure the waste inputs/treatment management techniques ensure that the parameters of the odour modelling for the drying activity remain within the scenario selected for the modelling.

Reason: An odour benchmark of 212 odour units per cubic metre has been used to model impacts from the drying line (page 136 of Schedule 5 response dated 14<sup>th</sup> October 2021). This benchmark results in an acceptable level of potential odour from this process at the sensitive receptors. However, if more odorous wastes were to be dried then this could result in a higher actual benchmark. The schedule 5 issued 22<sup>nd</sup> March 2021 queried what control measures were in place to limit odour potential to the benchmark used in the modelling. The answer provided on page 32 of the schedule 5 response from 14<sup>th</sup> October 2021 does not provide enough detail to answer this query. An actual benchmark above the figure quoted could result in an off-site odour issue.

### **Noise Management Plan (NMP) – Issue 2, dated 13<sup>th</sup> September 2021**

We require a revised noise management plan which has been amended to address the requirements of the questions below. Please refer to our updated online noise guidance:

<https://www.gov.uk/government/publications/noise-and-vibration-management-environmental-permits/noise-and-vibration-management-environmental-permits>

6. Supply appendices 1-4.

*Reason: A full review of NMP was not able to be completed.*

7. Conduct a BS4142 noise survey off site.

*Reason: Appendix 5 references in 4.0 Noise Survey that BS 7445-1: 2003 was used. Within the above guidance it states that BS4142 should be used and although this is referenced in appendix 5, this is done via a modelling programme. Eco Power is already sited, therefore an on-site survey should be conducted to BS4142.*

8. Conduct BS4142 survey with representative weather conditions and operational times.

*Reason: Within section 4.0 – the survey was primarily conducted during weekend hours and a southerly wind direction.*

9. Provide measurement data for the building with both the doors open and shut.

*Reason: Although within the NMP it states noise attenuation from the building has not been applied, it is still Best Available Technique (BAT) to have doors shut. By recording the data for doors open and shut, it can be determined whether the process can be conducted without noise pollution with the doors open.*

Further noise guidance can be found here:

Noise impact assessments involving calculations or modelling - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Emissions management Plan (EMP) – schedule 5 response dated 14<sup>th</sup> October 2021**

You must use appropriate measures to make sure that you collect, extract and direct all process emissions to an appropriate abatement system for treatment before release. To reduce point source emissions to air (for example dust and odorous compounds) from the treatment of waste, you must use an appropriate combination of abatement techniques. Or you must demonstrate to us that your alternative abatement is equally effective. This is both an appropriate measure and BAT, see BAT 14 and 25.

10. Explain why cyclone filters are proposed to minimise dust from the cooling of SRF pellets and why the dust emission limit proposed was selected.

*Reason: Dust management for the pellet cooling is proposed to be cyclone filters with a suggested emission limit of 10mg/cubic metre. BAT 25 considers cyclone filters to be a preliminary treatment for coarse dust and BAT would be one or a combination of treatment methods (such as cyclone plus bag filter). There is no justification provided for why this was not considered and the BAT AEL of 2-5mg not pursued instead.*

11. Explain why an emission limit of 10mg/cubic metre was selected for emissions from the dust extraction system proposed for the treatment shed.

*Reason: Dust management for the extraction system for the treatment shed is a fabric filter but an emission limit of 10mg/cubic metre is proposed. BAT 25 AEL is approaching 10mg*

*when a fabric filter is not applicable. As a fabric filter is proposed then the emission limit value should be in the 2-5mg region.*

12. Clarify what the monitoring frequency will be dust emitted from the dust management and pellet cooling emission points.

*Reason: BAT 8 for dust monitoring is 6monthly and would apply to these emission points.*