

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

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 21st October 2020.

Send the information to either the email or postal address below by 17/05/2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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
Matthew Woollin	22/03/2021

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.

Schedule

1. Please submit further information in relation to the drying of the SRF. Please include the following as a minimum:
 - Full details of the drying technique used i.e. full details of dimensions and volume that can be treated at any one time;
 - Provide full detail of the drying temperatures, duration, moisture content control and desired output level;
 - What moisture level in waste triggers the requirement for it to be dried;
 - How much waste can be dried per day.

Reason: It is not clear how the drying process works in practice and is managed to ensure minimum fire risk and optimum moisture content. Without output parameters how can energy efficiency of the drying facility/wood fuelled appliances be controlled and maximised.

2. Provide an up-to-date plan of the site to replace the site layout plan (and other appropriate site plans referenced in management plans).

Reason: The design of the waste reception shed has changed since the permit application was submitted

3. Clarify the maximum period of time that waste will be stored in the non-conforming waste quarantine area before it is removed.

Reason: the non-technical summary in section 4.2.7 states that waste will be stored in the quarantine area intended for non-conforming wastes for up to 5 days. If the waste is odorous or poses a risk due to pests then this may result in a risk of pollution

4. Provide details for the type of facilities that will use the RDF/SRF produced by the waste treatment process and how these represent a recovery operation.

Reason: Incinerating waste is a disposal activity. Incinerators can be re-classified as a recovery operation if they get R1 status. No details have been provided as to the type or status of the sites likely to burn the RDF/SRF produced by the treatment process. The application applies for a Schedule 5.4 A (1) (b) (ii) activity but does not explain how the RDF/SRF produced by pre-treatment of waste for incineration or co-incineration will be subsequently used for Recovery or a mix of recovery and disposal of non-hazardous waste. Where RDF/SRF is used in a process that is not a recovery operation then it may be more appropriate to permit the pre-treatment activity as a Schedule 5.4 A (1) (a) (iii) activity (Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day).

Emissions management Plan (EMP)

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

www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit
(Updated October 2020).

5. Explain why dust produced by the emissions from the wood fuelled appliances has not been included as a source.

Reason: In Section 4, Potential Sources no consideration is given to dust emissions from flue gases from the 41 wood fuelled appliances.

6. Review and update the list of receptors used in the EMP including justifying why a 500 metre radius has been used as cut-off distance for potential sensitive receptors given that the nature of the dust from use of wood fuelled appliances and treatment (including drying) of the proposed wastes is different to that for dust from quarries.

Reason: No consideration given to the public footpath immediately adjacent to the north of the site. No consideration given to new development taking place to the North East of the site on Brickyard Lane.

7. Review the proposed monitoring locations given in figure 4 of the EMP

Reason: The public footpath has not been considered as a monitoring location despite it being susceptible to heavy dust particles and fugitive emissions from the building fabric.

8. Review the dust emissions from the drying of waste and how these can be monitored and minimised

Reason: The drying process involves blowing warm air through shredded waste and discharging via stacks without any dust monitoring or abatement.

9. Review and update the options available for dust control measures.

Reason:

- *No consideration given to use of fast acting doors for entrances*
- *No consideration given to use of negative pressure system for dust extraction*
- *No consideration given to use of dust abatement within the building*
- *No consideration given to use of abatement for dust vented to atmosphere by the operation of wood fuelled appliances and the drying of waste*
- *No consideration given to use of dust monitoring (other than visual checks) or suppression within or outside the building other than use of spraying of surfacing in extreme conditions*

10. Provide a clear monitoring plan to demonstrate how you will monitor all sources to ensure emissions remain under control including a review of the monitoring measures proposed for dust at the site. This must include:

- Defined triggers to indicate when action must be taken to bring fugitive emissions back under control.
- Identification of monitoring points and justification as to why these are appropriate taking into account high risk receptors.
- Monitoring technique, frequency and time of monitoring accounting for high risk operating periods.
- Monitoring check sheet that takes into account the above.

Reason: Table 53 of the EMP identifies that visual inspection will be carried out which may need to be increased during high risk operations/during prolonged dry/windy conditions and a site monitoring check sheet is provided in Appendix II. The check sheet does not provide any specific detail about what should be monitored, where monitoring will take place and when, nor does it identify the triggers for taking any specific actions. Despite proposing to operate a potentially dusty process no consideration has been given to anything other than visual dust monitoring. You must take into the account the BAT conclusions for the mechanical treatment of wastes in BAT no 8, BAT no 14 and BAT no 25 in the BAT conclusions for waste treatment document (2010/75/EU) 2018. This must include shredding, drying and pelletisation of wastes as a minimum.

11. Describe the contingency plans you will put in place to bring fugitive emissions back under control in the event day to day measures are failing and emissions exceed triggers defined in the monitoring plan. You must identify and describe a contingency measure for each individual source and define triggers for implementing and stopping the contingency measures once the emission is deemed to be back under control.

Reason: The EMP does not provide a detailed contingency plan for the individual sources on site. Section 7.2 refers to Table 14 as containing a detailed contingency plan, there is not a Table 14 in the EMP. However, Table 64 does provide some very general contingency measures but it would not be possible for an operative to understand what actions they must take for individual sources to bring emissions back under control or what would trigger the use of the very basic contingency measures.

12. Review the control measures listed in the site monitoring contingency plan and the emergency scenario contingency measures of the EMP

Reason: The contingency plan does not contain any active control measures for dust within the building or potentially found within the emissions for the wood burning appliances or drying process, therefore if dust does prove to be an issue there are no control mitigation methods other than suspending operations.

13. In addition to annually, confirm the timescales for when the EMP will be reviewed in the event that control measures fail.

Reason: In section 9 of the EMP you state that the EMP will be reviewed annually and if control measures fail or are inadequate, however no timescale or further detail of how this will be measured/implemented is given.

14. Confirm what actions will be taken in the event of a complaint/s in relation to corrective and preventive measures.

Reason: Section 8 of the EMP describes the complaints procedure. In section 8.2.3.1 you describe certain corrective and preventive measures, these are very basic measures and given the commitment to implementing measures within 1-3 days these may not be adequate to control dust generation/escape, robust control measures would reduce the risk of the site having to suspend operations as per section 8.2.7.1 of the EMP.

15. Explain how the company will interact with the local community to better understand possible impacts from the site.

Reason: Reason: In section 8 of the EMP you have stated how you will respond to complaints which includes investigation and substantiation of the complaint. However, you have not explained how you will engage with the community following a complaint and the steps that will be taken to pro-actively engage the community to prevent complaints in the first instance.

Noise Management Plan (NMP)

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

<https://www.gov.uk/government/publications/environmental-permitting-h3-part-2-noise-assessment-and-control>

16. Explain who produced the document and their qualifications that are relevant for this document

Reason: This is a specialist subject and the right assessments need to be completed to make sure this is an effective document.

17. For a noise management plan, data needs to be collected from (potential) noise sources.

Reason: To have an understanding of the effect of the installation on receptors, you need to be able to demonstrate you have effectively used BS4142 Methods for rating and assessing industrial and commercial sound. You must take into account Best Available Techniques (BAT) reference Document for Waste Treatment 2018 which states “detailed assessments of sound power levels for individual plant items or modelling that may be necessary for either new or existing installations taking into consideration the potential for noise problems.”

18. Review and update the list of receptors used in the NMP including justifying why a 1KM radius has been used as cut-off distance for potential sensitive receptors

Reason: No consideration has been given to the potential wildlife that may be affected. No consideration has been given to the new development at Brickyard Lane. No indication how the receptors may be affected at different times of the day. Business / residents may be affected in different ways, this has not been indicated. The NMP indicated that operations will commence at 06:00, this is classed as night time by World Health Organisation (WHO) and BS4142.

19. Explain how the building has been appropriately sited and designed as stated within 5.2.1 of the NMP.

Reason: No design details have been provided for the building, and how this will minimise the impact of noise. You must also take into the account the BAT conclusions in BAT no 17 and BAT no 18 in the BAT conclusions for waste treatment document (2010/75/EU) 2018.

20. Explain what attenuation is being used to keep noise below 50dB and how this was measured. There does not seem to be any measurements to support this figure.

Reason: The proposed activities have the potential to increase noise levels within the local area, with the potential to cause noise pollution to local receptors. Not all local receptors have been identified. No evidence of how noise will be kept below 50dB.

21. Table 4 details that tipping height will be from 2 metres, however within section 8.2.3.1 a corrective measure is to reduce the tipping height to 1 metre. Why have these heights been included?

Reason: Reducing drop height is a standard approach to limiting impact noise. Justification as to the heights described within the NMP, and evidence that this will reduce the noise levels should be provided. Can 1 metre drop heights be the standard?

22. Within section 8 of the NMP, the dust complaint procedure and OMP are referenced. Please review document to reflect the NMP.

Reason: There is no need for a reference of dust complaint procedure or OMP within the NMP.

23. Confirm what actions will be taken in the event of a complaint/s in relation to corrective and preventive measures.

Reason: Section 8 of the NMP describes the complaints procedure. In section 8.2.3.1 you describe certain corrective and preventive measures, these are very basic measures and given the commitment to implementing measures within 1-3 days these may not be adequate to control noise generation/escape, robust control measures would reduce the risk of the site having to suspend operations as per section 8.2.6.1 of the NMP.

24. Explain how the company will interact with the local community to better understand possible impacts from the site.

Reason: In section 8 of the NMP you have stated how you will respond to complaints which includes investigation and substantiation of the complaint. However, you have not explained how you will engage with the community following a complaint and the steps that will be taken to pro-actively engage the community to prevent complaints in the first instance.

25. Confirm operating hours of the plant / machinery.

Reason: There is a contradiction in operating hours. In table 4 the operating times are from 06:00-18:00 (12 hours), and within Plant Operating Hours timetable, this suggests operating times will be 20 hours per day.

26. Provide details of how daily inspections will be used to monitor any increase levels in noise.

Reason: Within the noise monitoring section of the NMP, daily inspections will be undertaken to monitor any increase levels of noise, no mention of how this monitoring will be undertaken, or what monitoring equipment will be used.

27. Provide noise levels for machinery is listed within section 3.1.2.

Reason: Without having noise levels for the machinery, it is impossible to say whether this will give rise to pollution. There is also no mention of access to the building this machinery is located and whether doors are automatically closed, how long each day the doors are open, what the impact is likely to be when the doors are open or when closed.

28. In section 3.1.3 reverse beepers are mentioned. The use of broadband “squawk” for vehicles would be more appropriate.

Reason: This is a recognised method used for BAT.

29. Within section 3.1.3, the word ‘clatter’ is used. More specific detail is needed as to what may cause this noise.

Reason: This is a potential source for noise pollution, therefore more information is needed to determine if this is the case.

30. In Table 4, a figure of 50dB is used stating that noise levels will not exceed this. Evidence is needed to justify this statement.

Reason: This activity could give rise to noise pollution. Evidence is needed to show how this has been determined. Provide the data which should provide estimates of the different noise sources either from design criteria and manufacturers data or from measurements of similar equipment or a combination of both.

Pest Management Plan (PMP)

An updated version of the PMP is required to include revisions that address the questions below:

31. Provide details regarding the design of the quarantine area for non-conforming wastes as shown on the fire prevention and mitigation plan

Reason: Reference is made in 5.4.7 of the PMP to non-conforming wastes being diverted to an outside quarantine area despite section 5.2.1 stating that no wastes will be stored externally. Given the nature of the proposed wastes and the possible reasons for rejection how will risks from the wastes be minimised by the containment measures for the quarantine area?

32. Define the term “summer months”.

Reason: Section 5.8.1 of the PMP states that storage times for SRF and RDF will be a maximum of 1 week during summer months. Although the term “summer months” is used in Table 8 it is not clear if this applies throughout the PMP.

33. Provide an updated site plan as currently shown in “fire prevention and mitigation plan” that includes labelling for the waste storage bays.

Reason: The current labelling approach refers to list of waste codes rather than a written description of the waste. We need clarity on what the bays will be used to store i.e. fines from processing of feedstock, processed waste awaiting palletisation etc.

34. Provide detail on the storage of feed material and the various outputs from the processing of feed material, including:

- How long the materials will be stored for;
- What monitoring for pests will take place?
- What management to prevent or control pests will take place?

Reason: the storage of waste pending treatment in the feed material store poses a risk from pests, especially in warmer weather when the waste may have been stored off site long enough for fly infestations to start before waste is accepted at the site and residual food stuffs pose a clear risk from attracting scavengers. Similarly the fines from the processing of the above although stored in the main treatment building pose a risk from fly infestation and from attracting scavengers, given the waste will be stored in a building it is likely to be attractive to pests throughout the year. Section 7 of the PMP (Emergency Scenarios) details that wastes may be stored at the site for up to 3 months in the period November to March. Whereas Section 5.2.2 states that the maximum storage time will be 1 week. There are therefore conflicting timescales for waste storage within the PMP. Waste storage times need be kept to a minimum as a primary control measure for pests, this is especially important for unprocessed wastes and waste fines.

35. Clarify where waste brought to site will be stored prior to processing

Reason: Table 4 of section 3 of the PMP states that storage of waste prior to processing will take place in Boiler House 2, this is supported by drawing “fire prevention and mitigation plan” which shows wastes with List of Waste codes 19 12 10 and 19 12 12 as being in Boiler house 2. Whereas, Section 5.4.4 of the PMP states that all wastes (unprocessed) will be stored in a waste storage building (presumably the feed material store). It is not clear therefore which area will be used for the storage of unprocessed wastes.

36. Clarify where SRF and RDF produced from waste processed at the site will be stored.

Reason: Drawing “fire prevention and mitigation plan” shows wastes with List of Waste codes 19 12 10 and 19 12 12 as being in Boiler house 2. This suggest that Boiler House 2 may be used for storing unprocessed waste and or RDF/SRF it is therefore not clear where the pelletized waste or RDF from the permitted activity will be stored. The above drawing suggests there is a risk of interaction/contamination from a high risk material (unprocessed waste) with lower risk material (SRF/RDF).

37. Explain what actions will be taken to understand and minimise the age of the waste brought to site and where high risk waste is identified what measures will be taken to control these risks.

Reason: The primary method that can be used to minimise the risk of pests is to control as much as possible the age of the waste i.e. minimize as much as possible the time between the initial production of the waste and it's processing into SRF/RDF. Given that the wastes proposed for this site are wastes arising from the processing of waste at other waste management facilities then there is a greater risk that some of the material could have already been exposed to pests and therefore pose an imminent risk of pests once deposited i.e. fly infestations. We therefore expect robust control measures that mitigate this risk as much as possible.

38. Explain how the company will interact with the local community to better understand possible impacts from the site.

Reason: In section 8.1 of the PMP you have stated how you will respond to complaints which includes investigation and substantiation of the complaint. However, you have not explained how you will engage with the community following a complaint and the steps that will be taken to pro-actively engage the community to prevent complaints in the first instance.

Environmental Permitting Technical Requirements (EPTR), Section 10; compliance with BAT conclusions

Reference is made separately in this schedule in relation to the applicability of BAT as a consideration in developing the EMP and NMP.

When referring to BAT in the following questions, the BAT documents of reference are:

[Sector Guidance Note IPPC S5.06 Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste \(S5.06\);](#)

[Best Available Techniques \(BAT\) Reference Document for Waste Treatment Industrial Emissions Directive 2010/75/EU \(Integrated Pollution Prevention and Control\) \(2018\); and](#)

[BAT conclusions for waste treatment 2010/75/EU dated August 2018.](#)

39. Explain how waste pre-acceptance and acceptance procedures will control the acceptance of waste so as to limit the odour rate emissions to those utilized in any odour model used to understand risk.

Reason: the conclusions used in the odour assessment report rely on a certain level of odour rate emission from the drying process. The risk of odour from incoming waste will be determined by their composition. The suggested list of wastes to be accepted at the site include 19 12 12 wastes. The written description proposed for 19 12 12 wastes mean that they could potentially include a range of odorous materials. Robust waste pre-acceptance and acceptance as referenced in BAT no 2 should include controls as to how waste inputs will be managed to match the predicted odour rate emissions used in modelling.

40. Demonstrate how the waste reception proposal meets the requirement of BAT no 4.

Reason: The proposed operation involves tipping waste in a storage shed and then moving this waste to another reception area prior to treatment. BAT no 4 requires that "the storage is located in such a way so as to eliminate or minimise the unnecessary handling of wastes

within the plant (e.g. the same wastes are handled twice or more or the transport distances on site are unnecessarily long)."

41. Clearly define the maximum storage times for all waste streams accepted and generated at the site.

Reason: reference is made the FPP, EPTR, and OMP to storage times for wastes. BAT no 4 requires that "the maximum residence time of waste is clearly established."

42. Explain how you will monitor use of water, energy, diesel fuel and biomass on an at least annual basis.

Reason: BAT no 11 requires for a minimum annual monitoring of water, energy and raw materials.

Energy Efficiency

43. Demonstrate that the installation can meet the Indicative BAT requirements in section 2.7 of SGN5.06 and BAT no 23 of the BAT conclusions for waste treatment (2010/75/EU) 2018. You must provide the following as a minimum in accordance with BAT:

- A comprehensive breakdown of the energy consumption and generation by individual source and the associated environmental emissions – see section 2.7.1 of SGN5.06
- The proposed measures for improvement of energy efficiency – see section 2.7.2 of SGN5.06
- Demonstrate the degree to which the further energy-efficiency measures identified in the implementation plan have been taken into consideration and justify where they have not – see section 2.7.3 of SGN5.06.

Reason: Section 9 of the EPTR document addresses the energy efficiency measures at the installation, however it does not provide the level of detail or documentation required to demonstrate that the installation will be operated in accordance with BAT. For example reference is made to the likely need for 936000 litres of diesel fuel (the majority likely needed for electrical generation) but a figure of only 21.49 tonnes of CO² is used in table 4 (energy consumption).

44. Specifically demonstrate why 41 130KWth wood fuelled boilers are more efficient than one or two larger boilers for drying waste and why alternatives to provide both heat and power were not considered.

You must compare the following:

- The energy consumption and associated emissions
- The energy efficiency
- Which engine technology is the best option

Reason: You propose to use 41 Angus Orland (Orligno?) Super 130kw biomass boilers, resulting. The total net rated thermal input for the plant equates to 5.33MW, which could be achieved using larger, more efficient plant. An attempt has been made to justify why a large number of smaller boilers are the most efficient in accordance with indicative BAT energy efficiency measures, this is not satisfactory given that other options such as use of heat stores linked to a larger boiler could be available and does not account for issues with start-up/cool down of a large number of smaller units. No consideration appears to have been made to alternatives to wood fuelled boilers such as natural gas that are more suited to fluctuating load demands. Furthermore as there is a requirement for both electricity and heat consideration could have been given to the use of alternatives such combined heat

and power (CHP) units to provide both as referenced as possible BAT in Section 2.7.3 of S5.06.