

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

Eco-Power Environmental (Hull) Ltd

Company Secretary

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 on 22nd October 2020.

Send the information to either the email or postal address below by 19/03/2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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	22/01/2021

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.

Fire Prevention Plan

You must consider the 'Fire Prevention Plans: environmental permits' guidance (updated 09/01/2020) insert date of latest update on [GOV.UK](https://www.gov.uk), hereafter referred to as the guidance, and come to your own view as to what proposals you consider will meet the objectives to:

- minimise the likelihood of a fire happening;
- aim for a fire to be extinguished within 4 hours; and
- minimise the spread of fire within the site and to neighbouring sites.

You can follow the measures set out in the guidance and if you do so you will meet the objectives of the guidance and we are likely to approve your Fire Prevention Plan (FPP). If you do not include these measures you can propose alternative measures to meet the objectives. We will technically assess your alternative measures and, if we are satisfied that they meet the objectives, we can approve the FPP.

If your proposals do not meet the measures in the guidance, you should explain in detail the alternative measures you intend to take and how those measures can meet the objectives. This applies to each of the information requests in the attached schedule.

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

Fire Prevention Plan

Adequate answers to the following are required for the FPP to pass assessment:

1. Provide details which show you have considered and mitigated for materials on site which are not covered by the guidance but still pose a fire risk (e.g. combustible liquids or hazardous materials). This includes any gas cylinders, fuel tanks, aerosols and chemicals on site. These materials should be shown on the site plan and confirmed to be adequately separated from combustible wastes.
2. Your FPP needs to ensure the fire prevention measures will be put in place and used on site. Provide details of regular training exercises on site to test how well your plan works and to ensure that staff understand all the requirements of it. This should include training in day-to-day operation (e.g. stockpile management), as well as incident response.
3. Your site plan is currently missing:
 - a. The location of fixed plant or where mobile plant is stored when not in use
4. Provide detail of security measures on site in relation to CCTV. The design, installation and maintenance must be covered by an appropriate [UKAS-accredited](#) third party certification scheme.
5. Confirm electrics on site will be fully certified by a qualified electrician and outline the written procedures in place that set out regular maintenance.
6. Confirm that a fire watch will monitor the site at regular intervals during the working day, to detect signs of a fire from hot exhausts or engines, and outline the regularity of these intervals.
7. Confirm and provide details of a quarantine area for hot loads.
8. Provide details of how external heating during hot weather will be taken into account and confirm that waste will be shaded from direct sunlight if required and/or any other techniques that will be in place to enable heat generated within the pile to be released.
9. Provide details which show that fire walls and bays are designed to resist fire (both radiative heat and flaming) and have a fire resistance period of at least 120 minutes to allow waste to be isolated. Fire walls must show compliance with all factors outlined in Section 11.2 of the guidance.
10. Provide details of the quarantine area(s) on site. The quarantine area(s) must be within the boundary of the site for which the permit applies and be large enough to hold at least 50% of the volume of the largest pile. The quarantine calculation assumes $6 \times 10 \times 4 = 240$ cubic metres but waste would not be in a bay so more likely to be 120m, needs to be 224 cubic metres to meet the requirements. Confirm a separation distance of at least 6 metres around the quarantined waste will be in place.
11. Provide details of the detection system on site. The detection system should be proportionate to the nature and scale of waste management activities you carry out and the associated risks. For all automated systems the design, installation and maintenance should be covered by an appropriate UKAS-accredited third party certification scheme. If

the system is not accredited, provide details as to why not and outline how the system will work on site.

12. Provide details of the suppression system on site, ensuring the design, installation and maintenance of all automated suppression equipment is covered by an appropriate UKAS-accredited third party certification scheme. If the system is not accredited, provide details as to why not and outline how the system will work on site.
13. Provide details of how you have designed your site to allow for active firefighting, outlining the procedures in place in the event of a fire.
14. Provide site specific calculations for water supply in accordance with the guidance. You need to account for a worst case scenario, which is defined as your largest waste pile catching fire. As a guide, a water supply of at least 2,000 litres a minute for a minimum of 3 hours is needed to tackle a 300 cubic metre pile of combustible material (this equates to approximately 6.7 litres/minute for every 1m³ of material). Reference is made to 9000l/min of water being available from hydrants but no information provided to justify this. Previous fires at this site have shown the hydrants have limited flow capacity.
15. Provide details of how incoming wastes will be diverted to alternative sites during a fire. You need to show a plan is in place for how you will notify those who may be affected by a fire, such as nearby residents and businesses. Provide details of how you will clear and decontaminate the site following a fire and the steps you will take before the site can become operational again.

Odour management plan (OMP)/Environmental Permitting Technical Requirements (odour only)

16. Add North Ferriby to the list of sensitive receptors.
17. Explain the reasoning behind the assumption made about the odour emission value for emissions from the drying process used in modelling impact.
18. Modelling should be re-run with a higher odour emission value.
19. Re-run the model to account for reduced benchmark due to a sensitised population.
20. Consider alternate odour monitoring location points, especially in the North Ferriby area.
21. Confirm the location and purposes of the monitoring locations on figure 2 of the OMP that appear to be within or on top of the building.
22. The OMP needs to consider the risk of odour generated by the operation of the wood fuelled boilers.
23. Revise the OMP review triggers to account for information provided by complaint investigation and actual impact of the proposed activity (especially use of wood fuelled boilers and drying line).
24. Provide detail as to how public engagement will be initiated and encouraged.
25. Provide indicative examples for how odour from the boilers or drying could be reduced if determined to be the source of odour.
26. Define what represents a substantiated complaint.

27. This application seeks to add a drying activity using wood fuelled appliances to provide heat. Please revise your best available techniques assessment (BAT assessment) to ensure that all the necessary procedures and operating techniques are updated to include the wood fuelled appliances and drying activity of the SRF. Please ensure that it addresses all the requirements of the Waste Treatment BAT conclusions¹. Namely; please revise BAT 10, 12 and 13 to ensure you have adequate monitoring and management of odours on the site with regards to emissions from the wood fuelled appliances and the drying of SRF.

Notes on OMP review/review of BAT in relation to odour

The proposed activity seeks to replace part of an existing permitted operation, there is a history of odour complaints relating to the existing site. The assessment of risk in the odour management plan (OMP) should take account of the complaints history, this is important when seeking to understand and model risk.

The sensitive receptor boundary is set at 1km from the site, this does not take account of North Ferriby; a village with a history of odour complaints, especially important for the north western side of the village which is down wind of the proposed activity for a significant proportion of time using the wind rose submitted in the OMP.

The proposed drying activity involves subjecting waste to a range of processes that are normally minimised in an effort to reduce odour. Such as shredding, heating and increasing the rate of evaporation. By doing this the output will be a gaseous stream that could be odorous. The modelling relies on an assumption that the odour rate emissions of the drying activity will be the same as that from a Biofilter (212 Odour units/cubic metre).

When modelling odour it is assumed that the odour will be moderately offensive when determining the benchmark level, as there is an already sensitised population then this should be accounted for and the benchmark reduced.

Two of the primary potential sources of odour will be the emission stacks from the boilers and drying plant. The proposed odour monitoring locations (Figure 2 OMP) are unlikely to monitor any odour from these as the emissions may not have fully mixed or reached ground level.

There are 2 distinct potentially odorous point source emissions:

- *Emissions from wood fuelled appliances*
- *Emissions from drying of waste*

These have distinct and different natures and risks i.e. emissions from waste drying will be moisture rich. In Guidance for the Treatment and Transfer of Hazardous Waste and Non-Hazardous Waste S5.06, reference is made to the difficulty this raises with plume dispersion and recommends investigation of methods to reduce moisture content before discharge. Whereas emissions from the wood fuelled appliances will be dry, with the proposed fuelling arrangements in process controls of the appliances is hard to quantify in relation to minimising emissions (stop/start nature of fuelling and use). There is an inadequate investigation/explanation made in the OMP as to how odour from the 2 sources mentioned here could be reduced.

The OMP includes an assessment of predicted odour concentrations that includes the suggested contribution from the drying line. There is also predicted concentrations of certain emissions from

¹Waste Treatment BAT Conclusion. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018D1147&from=EN>

the wood fuelled boilers. This does not include a consideration of the odour from the heating appliances, given that combined thermal input for these are over 5MW of thermal capacity, fuelled by the manual loading of wood then there is a clear risk of the odour of smoke. This is supported by complaint history within the last few months which have shown a new pattern of complaints of a burning/wood smoke nature.

The plan of proposed monitoring locations includes 2 locations that appear to be either within the building or on top of the building.

The OMP includes a commitment to review after 12 months to ensure continued effectiveness. As the proposed activity includes a new process (wood fuelled boilers and drying line) then this is a long time to wait to review a plan.

Community liaison is described in a reactive manner depending on request to attend, given the complaint history active engagement is preferable.

Corrective measures are detailed in the report. No mention is made of measures that could be taken if emissions from use of wood fired boilers or the drying line are determined to be the source of the odour. Corrective measures are described as being considered following a substantiated complaint.

BAT requirements particularly of relevance being:

BAT 10; monitoring of odour in cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated.

BAT 12; OMP to contain - an odour prevention and reduction programme designed to identify the source(s); to characterise the contributions of the sources; and to implement prevention and/or reduction measures.

BAT 13; In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques given.