

**APPLICATION FOR AN ENVIRONMENTAL PERMIT UNDER THE
ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016
(AS AMENDED)**

**PEST MANAGEMENT PLAN – UPDATE IN RESPONSE TO THE 2ND SCHEDULE 5
ECO-POWER ENVIRONMENTAL (HULL) LIMITED, GIBSON LANE, MELTON, HULL,
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23rd July 2021

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REVISION HISTORY

| Issue | Date | Status |
|-------|----------------------------|--|
| 1 | March 2020 | The 1 st issue of the report By Eco-Power Ref: Eco 09.03.2020/EMP Final Issue March 2020 |
| 2 | 23 rd July 2021 | The 2 nd Issue of the Update by Tetra Tech Ltd Inclusive of Responses to the EA's Notice of request for more information (the 2 nd Schedule 5 Request), the EA's letter was issued on the 22 nd March 2011 |

TABLE OF CONTENTS

| | |
|--|-----------|
| 1.0 INTRODUCTION | 6 |
| 1.1 Requirement for an Emissions Management Plan | 6 |
| 1.2 Report Revision History | 8 |
| 1.2.1 The First Issue of the Report | 8 |
| 1.2.2 The Second Report Update – In Response to the 2 nd Schedule 5 | 8 |
| 2.0 DISCRPTION OF THE SITE AND PROCESS..... | 14 |
| 2.1 Site Locaiton and Setting | 14 |
| 2.2 Discription of the Process | 14 |
| 3.0 POTENTIAL SOURCES ASSESSMENT | 18 |
| 3.1 Potential Source and Types of Pest..... | 18 |
| 3.2 Description of Pest Types | 21 |
| 3.3 Related pest problems | 22 |
| 4.0 POTENTIAL RECEPTORS..... | 23 |
| 4.1 Consideration for Identifying Sensitive Receptors | 23 |
| 5.0 OPERATIONAL AND PROCESS CONTROLS..... | 27 |
| 5.1 Pest Management Strategy | 27 |
| 5.2 sTORAGE IOCATIONS..... | 27 |
| 5.3 Waste Pre-Acceptance Procedure..... | 28 |
| 5.4 Waste Acceptance Procedure | 29 |
| 5.5 Staff Training | 30 |
| 5.6 Environmental Managemtne System | 31 |
| 5.7 Housekeeping Techniques..... | 31 |
| 5.8 Control Measures Specific to Pelletised Finished Product | 32 |
| 5.9 Specialist Pest Management company..... | 32 |
| 5.10 Actions to Minimise the age of the Waste..... | 33 |
| 6.0 SITE MONITORING PLAN | 34 |
| 6.1 General Pest Monitoring | 34 |
| 6.2 Fly Inspection Monitoring | 36 |
| 7.0 EMERGENCY SCENARIO CONTIGENCY MEASURES..... | 37 |
| 7.1 Contigency Measures | 37 |
| 8.0 COMMUNITY LIAISON AND RESPONSE TO COMPLAINS | 39 |
| 8.1 Community Liaison..... | 39 |

| | |
|---|-----------|
| 8.2 Response to Complaints | 39 |
| 8.2.1 Initial Response – Data Gathering | 39 |
| 8.2.2 Pest Complaint Investigation | 39 |
| 8.2.3 Pest Complaint - Corrective and Preventative Measures | 40 |
| 8.2.4 Pest Complaint – Evaluation of Corrective and Preventative Measures | 43 |
| 8.2.5 Timescales..... | 43 |
| 8.2.6 Feedback to Complainant..... | 43 |
| 8.2.7 Escalating complaints | 43 |
| 8.3 Records | 43 |
| 8.3.1 PMP Records | 43 |
| 8.3.2 Complaints..... | 44 |
| 8.3.3 Treatment | 44 |
| 8.3.4 Feedback..... | 44 |
| 9.0 PMP REVIEW..... | 46 |

LIST OF TABLES

| | |
|---|----|
| Table 2-1 Summary of Surrounding Land uses within 1km of the installation boundary | 14 |
| Table 2-2 Proposed Schedule 1 Activity | 15 |
| Table 2-3 Proposed Wastes to be Accepted at the Installation | 15 |
| Table 3-1 Potential Pest Sources and Types..... | 19 |
| Table 3-2 Common Fly Species Associated with Waste Facilities/Installations | 21 |
| Table 4-1 Potential Sensitive Receptors and Dust Assessment within 500m of installation Boundary | 25 |
| Table 6-1 Pest Monitoring Locations..... | 34 |
| Table 7-1 Emergency Scenario contingency Measures | 37 |
| Table 8-1 Indicative Corrective and Preventative Measures | 41 |

LIST OF FIGURES

| | |
|--|----|
| Figure 1-1 <i>Fire Prevention and Mitigation Plan</i> | 10 |
| Figure 2-1 Process Flow Diagram | 17 |
| Figure 4-1 Indicative Locations of Identified Sensitive Receptor within 1km of the Installation Boundary..... | 24 |
| Figure 5-1 PMP Strategy | 27 |
| Figure 6-1 Pest Monitoring Locations | 35 |

APPENDICES

| | |
|---|-----------|
| APPENDIX A THE 2ND EA SCHEDULE 5 LETTER | 47 |
|---|-----------|

| | | |
|------------|--|----|
| APPENDIX B | DRAWINGS..... | 58 |
| APPENDIX C | SITE EMS DAY DIARY CHECKS..... | 63 |
| APPENDIX D | PLANNED PREVENTATIVE MAINTENANCE REGIME..... | 64 |
| APPENDIX E | DAILY SITE MONITORING CHECKSHEET..... | 81 |
| APPENDIX F | FLY INSPECTION RECORD FORM..... | 82 |
| APPENDIX G | FLY INSPECTION RECORD – APR TO OCT..... | 83 |
| APPENDIX H | REPORT TERMS & CONDITIONS..... | 84 |

ACRONYMS/ABBREVIATIONS

| Acronyms/Abbreviations | Definition |
|------------------------|--|
| BAT | the Best Available Techniques |
| BREF | The Best Available Techniques Reference Document |
| EA | The Environment Agency |
| EC | European Commission |
| EPUK | Environmental Protection UK |
| EMP | Emissions Management Plan |
| EMS | the Installation's Environmental Management System |
| EP | the Environmental Permit |
| EPTR | Environmental Permitting Technical Requirement |
| EU | European Union |
| FPP | in the Fire Prevention Plan |
| FRS | The Fire and Rescue Service |
| IAQM | The Institute of Air Quality Management |
| IPPC | Integrated Pollution Prevention and Control |
| NGR | The United Kingdom National Grid Reference |
| NMP | Noise Management Plan |
| PMP | Pest Management Plan |
| PVC | Polyvinyl Chloride |
| RDF | Refuse Derived Fuel |
| SRF | Solid Recovered Fuel |
| Tt | Tetra Tech Ltd |
| UK | The United Kingdom |

1.0 INTRODUCTION

Eco-Power Environmental Limited commissioned Tetra Tech (formerly WYG) to update a pest management plan (PMP) in response to the EA's 2nd Schedule requests to support a planning application of a Waste Drying Plant, at Gibson Lane, Melton, Hull, HU14 3HH.

1.1 REQUIREMENT FOR AN EMISSIONS MANAGEMENT PLAN

A Pest Management Plan ("PMP") has been produced for Eco-Power Environmental (Hull) Limited ("Eco-Power") as part of the Environmental Permit ("EP") application at Gibson Lane, Melton, Hull, East Yorkshire, HU14 3HH. The PMP will form part of Eco-Power's Environmental Management System ("EMS").

Transwaste Recycling and Aggregates Limited ("Transwaste") currently operate a waste Facility at Gibson Lane, Melton under EP issued by the Environment Agency ("EA") (EPR/BP3792LD, issued 17/01/2017). Eco-Power wish to obtain a section of the permitted land with the intention of operating a waste recovery Installation within a building which will have a processing plant, drying floor area and pellet storage area. Transwaste will surrender the associated activity within their current Environmental Permit for this area if Eco-Power are granted the Environmental Permit.

The proposed activity is the production of fuel from waste via physical, mechanical and thermal treatment. Residual waste is delivered from waste management facilities and is shredded and run through a number of separation systems (trommel, magnetic, ballistic, infrared) before being placed on a drying floor. Waste heat from biomass boilers provides heat to reduce the moisture content of the residual waste Solid Recovered Fuel ("SRF"). The dried SRF is then pelletised (heat is applied, and material is passed through an extruder), cooled and stored prior to transfer off site for use as fuel.

All unprocessed SRF will be stored within the site buildings ready for rapid processing.

Approximately 250,000 tonnes per annum of residual waste from waste management facilities will be accepted.

As detailed in EA online guidance – 'Control and monitor emissions for your environmental permit' (updated in February 2020, accessed in March 2020), a PMP must be prepared if your risk assessment (See Eco 09.03.2020/ERA) indicates that the proposed activities have the potential to attract pests.

This PMP has been written to meet the requirements of the following:

- EA online guidance – 'Control and monitor emissions for your environmental permit' (updated in February 2020, accessed in March 2020);
- EA's 'Fly Management Guidance' (Version 3, June 2018);

- EA Sector Guidance IPCC S5.06 'Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste' (Issue 5, May 2013); and
- The Best Available Techniques Reference Document ("BREF") for Waste Treatment (October 2018) which contains the Best Available Techniques ("BAT") Conclusions, will be considered as it covers Installations associated with a number of waste treatments, including recovery and disposal of waste.

This PMP addresses the following issues:

- the waste types and/or on-site operations which could result in the presence of pests;
- the type of pests which could be on site and the problems caused;
- identification of potential sensitive receptors related to the distance pests can travel;
- process controls and procedures, including staff training and selecting long term prevention methods;
- site specific monitoring regime;
- trigger levels and emergency scenario contingency measures;
- community liaison and responding to complaints;
- record keeping; and
- review of PMP effectiveness.

The PMP provides information on the potential pest nuisance impacts from the Installation and the mitigation measures to be implemented. The PMP will be incorporated into the Installation's EMS and will include operational and control measures for normal, as well as abnormal conditions.

The PMP also provides a management framework comprising of proactive and reactive measures to manage and control potential pest nuisance from the Installation. This proactive approach will facilitate the ongoing development of operational procedures and controls as part of an on-going commitment to improving environmental performance. Reactive procedures will also be established within the PMP for the logging, evaluation and implementation of corrective actions in the unlikely event of pest nuisance complaints being received.

1.2 REPORT REVISION HISTORY

1.2.1 The First Issue of the Report

The first issue of the report was produced by Eco-Power, Ref: Eco 09.03.2020/EMP, Final Issue, March 2020.

1.2.2 The Second Report Update – In Response to the 2nd Schedule 5

Following the issue of the fourth report update, Mr Matthew Woollin, Environmental Officer, Permitting and Support Centre, Quadrant 2, 99 Parkway Avenue, Parkway Business Park, Sheffield S9 4WF, issued a letter on the 22nd March 2011, requires to provide the information the 2nd schedule 5 request.

The 2nd Schedule 5 letter requests the addition information, inclusive of Emissions Management Plan (EMP), Noise Management Plan (NMP), Pest Management Plan (PMP), Environmental Permitting Technical Requirement (EPTR), Section 10: Compliance with BAT Conclusions.

A copy of the 2nd Schedule 5 letter is presented in Appendix A.

The Emission Management Plan (EMP) has been updated in accordance with the 2nd schedule 5 request. The EA's 2nd Schedule 5 requests are presented in *italic* and the Tetra Tech's responses are summarised in **blue** below.

Schedule

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?

Tetra Tech (Tt) Response (31):

Response to the Schedule 5 comment:

The Section 5.2.1 (the first issue of the report, the first paragraph in Section 5.2 in this update) has been updated as "No storage or processing for the accepted waste will be undertaken externally at the installation. Operations are to be conducted within buildings fitted with roller shutter doors. The quarantines waste will be kept in the trucks waiting to be moved out of the site. the quarantines waste loaded trucks will be parked at the quarantine area. Therefore, no quarantined wastes will be stored externally."

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.

Tetra Tech (Tt) Response (32):

Summer months are defined as May to September.

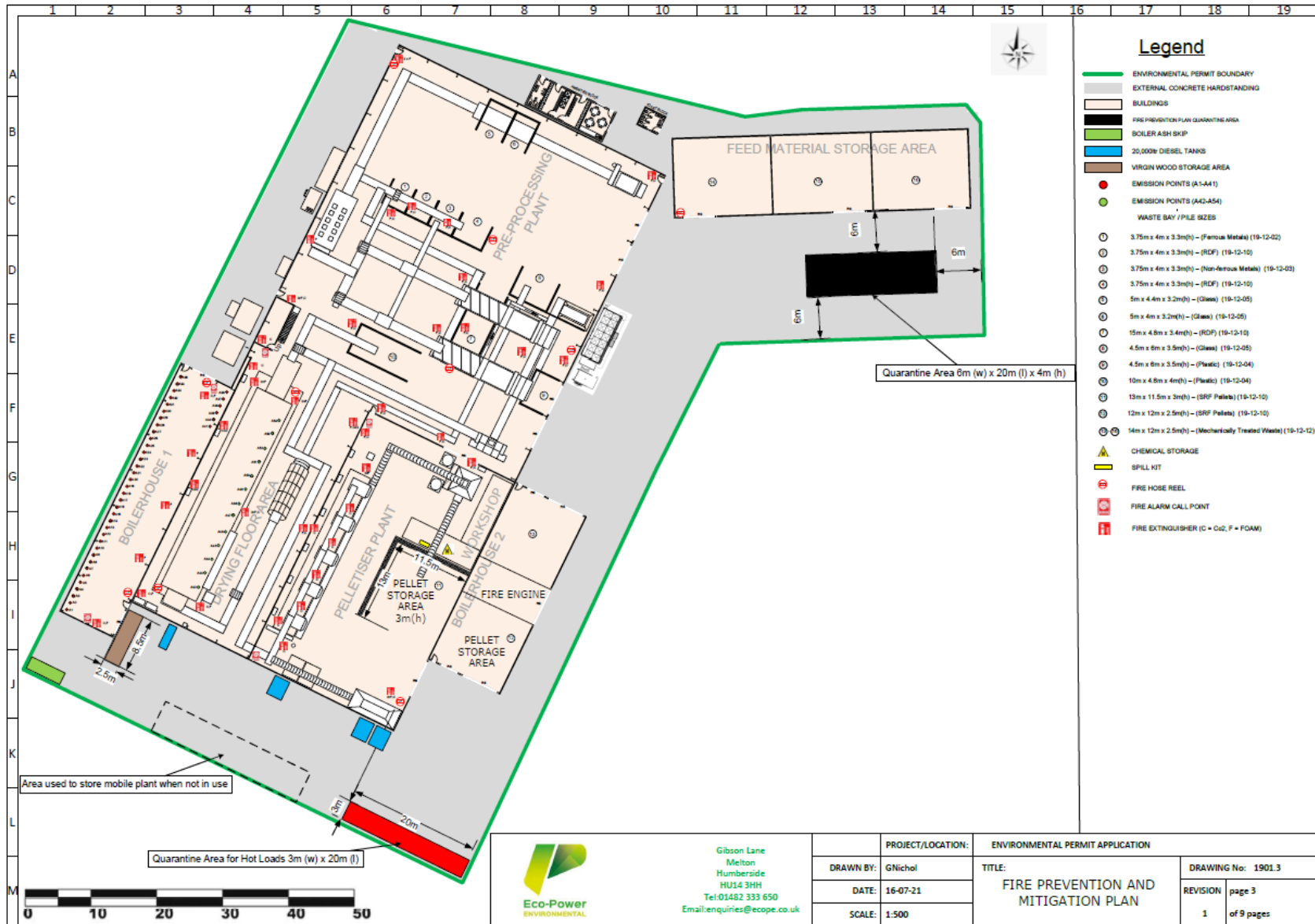
33. Provide an updated site plan as currently shown in “fire prevention and mitigation plan” that includes labelling for the waste storage bays.

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.

Tetra Tech (Tt) Response (33):

The updated site plan is shown in Figure 1-1 below.

Figure 1-1 Fire Prevention and Mitigation Plan



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.

Tetra Tech (Tt) Response (34):

- 3 days in warmer months (from April to October) as the site is using rotate sheds procedure;
- 7 days from November to March (updated in the second paragraph in Section 5.2 in this update);
- Section 6 of PMP has detailed what monitoring for pests will take place.
- As presented in the Section 5.9 of the this PMP update, “the specialist pest management company ensures that the appropriate controls are being implemented to prevent pest nuisance problems occurring”.

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.

Tetra Tech (Tt) Response (35):

Feed material storage sheds 1, 2, 3 and Boiler House 2 as in Table 3-1 of this update.

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).

Tetra Tech (Tt) Response (36):

The locations are shown on the attached revised Fire Prevention and Mitigation Plan. All unprocessed waste is stored in separate bays which prevents interaction/contamination.

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.

Tetra Tech (Tt) Response (37):

Section 5.10 was added on to include following actions.

The risk of fly infestation will be high during periods of hot weather, as the incoming waste is likely to be infested and fly development will be rapid. Parts of the site where the process generates elevated temperatures may be at risk of infestation throughout the year. The control measures will be used to minimise the rises:

- Monitor adult fly and larval numbers in key areas of site.
- Ensure swift processing of waste and avoid extended storage of unprocessed waste.
- Refuse the waste if it's likely to cause fly infestation - this would be dealt with as a waste acceptance issue under the conditions of the permit.
- Use sheeting or other containment when storing waste/waste products that are highly attractive to flies.
- Where possible, reduce fly movement out of the building e.g. use fast roller doors and maintaining negative air-pressure within waste treatment areas to reduce fly egress.
- Ensure site staff are trained in fly monitoring, and aware of the importance of fly prevention.

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.

Tetra Tech (Tt) Response (38):

Section 8.3.4 was added to including following actions.

Feedback to residents

Discuss the action taken with the affected residents. Advise them that treatment is likely to take several weeks to be fully effective, and they should continue to monitor until otherwise advised or they are confident the problem has been resolved.

Follow up visits to site

For sites where action was required, revisit the site within two weeks to assess the implementation of agreed actions and their effectiveness.

If the action taken on the site is inadequate or ineffective continue to work to address the problems. Ask yourself the following questions:

- Are there issues that were missed at the initial visit?
- Are there fly breeding areas that were overlooked, for example, lesser housefly larvae can be very difficult to locate?
- Does there appear to be resistance to the insecticide products used?
- Are there other significant fly-breeding sites nearby which have not yet been investigated?

Conclusion

Once the problem is resolved, advise all parties of the outcome of the investigation, action taken and proposals to avoid a recurrence. Advise complainants to contact us again if problems recur.

2.0 DISCRIPTION OF THE SITE AND PROCESS

2.1 SITE LOCAITON AND SETTING

Eco-Power is located on Gibson Lane, Melton, Hull, HU14 3HH and is centred on National Grid Reference (“NGR”) 496740 425532. The exact location of the proposed installation is indicated on Site Location Plan (Drawing 01) which shows the installation within the Environmental Permit boundary as a green outline. As the installation is on Transwaste Waste Facility site (“Transwaste”) their site boundary has also been outlined in red. This EMP relates only to the installation within the green boundary.

The installation is situated within Melton West Industrial Estate on Gibson Lane and the surrounding land uses are provided in **Table 2-1**. At present, the closest human receptors are the neighbouring Transwaste which Eco-Power operate from within their site boundary and hæshared access.

Table 2-1 Summary of Surrounding Land uses within 1km of the installation boundary

| Boundary | Description |
|----------|---|
| North | Residential (Melton and Welton villages) primary school, sixth form college, shops, a church and several public houses. Railway line. Melton Park industrial Estate off Redcliff Road |
| East | Residential (North Ferriby Village), school, shops, church, railway station, football club. Industrial Estate off Brickyard Lane. |
| South | Humber Estuary, Industrial Estate off Gibson Lane, Welton water activities. |
| West | Residential (Brough town), school, sports club, village halls, railway station, public houses and shops. |

The surrounding land uses, colour coded for each different land use, within 1km of the Environmental Permit boundary are displayed on the Sensitive Receptor Plan (Drawing 03) which is contained in Appendix B.

2.2 DISCRIPTION OF THE PROCESS

Eco-Power propose to operate under the listed activity detailed in **Error! Reference source not found.** under the Environmental Permitting (England and Wales) Regulations 2016 (“EP Regulations”) as amended.

Table 2-2 Proposed Schedule 1 Activity

| Activity listed in Schedule 1 of the EPR Regulations | Description of Specified Activity |
|--|---|
| Section 5.4 A(1)(b)(ii) | Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC – (ii) pre-treatment of waste for incineration or co- incineration. |

Eco-Power wish to focus on the production of SRF and Refuse Derived Fuel (“RDF”) at the Installation. Consequently, only 2 no. waste codes to be accepted at the Installation are proposed as detailed in .

Table 2-3 Proposed Wastes to be Accepted at the Installation

| Waste Code | Description |
|------------|--|
| 19 | WASTES FROM WASTE MANAGEMENT FACILITIES, OFF SITE WASTE TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE |
| 19 12 | Waste from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified |
| 19 12 10 | Combustible waste (refuse derived fuel) |
| 19 12 12 | Other wastes (including mixtures of materials) from mechanical treatment of waste other than those mentioned in 19 12 11 |

The proposed Waste Recovery System at the site will consist of:

- shredding;
- separating;
- drying; and
- pelletising.

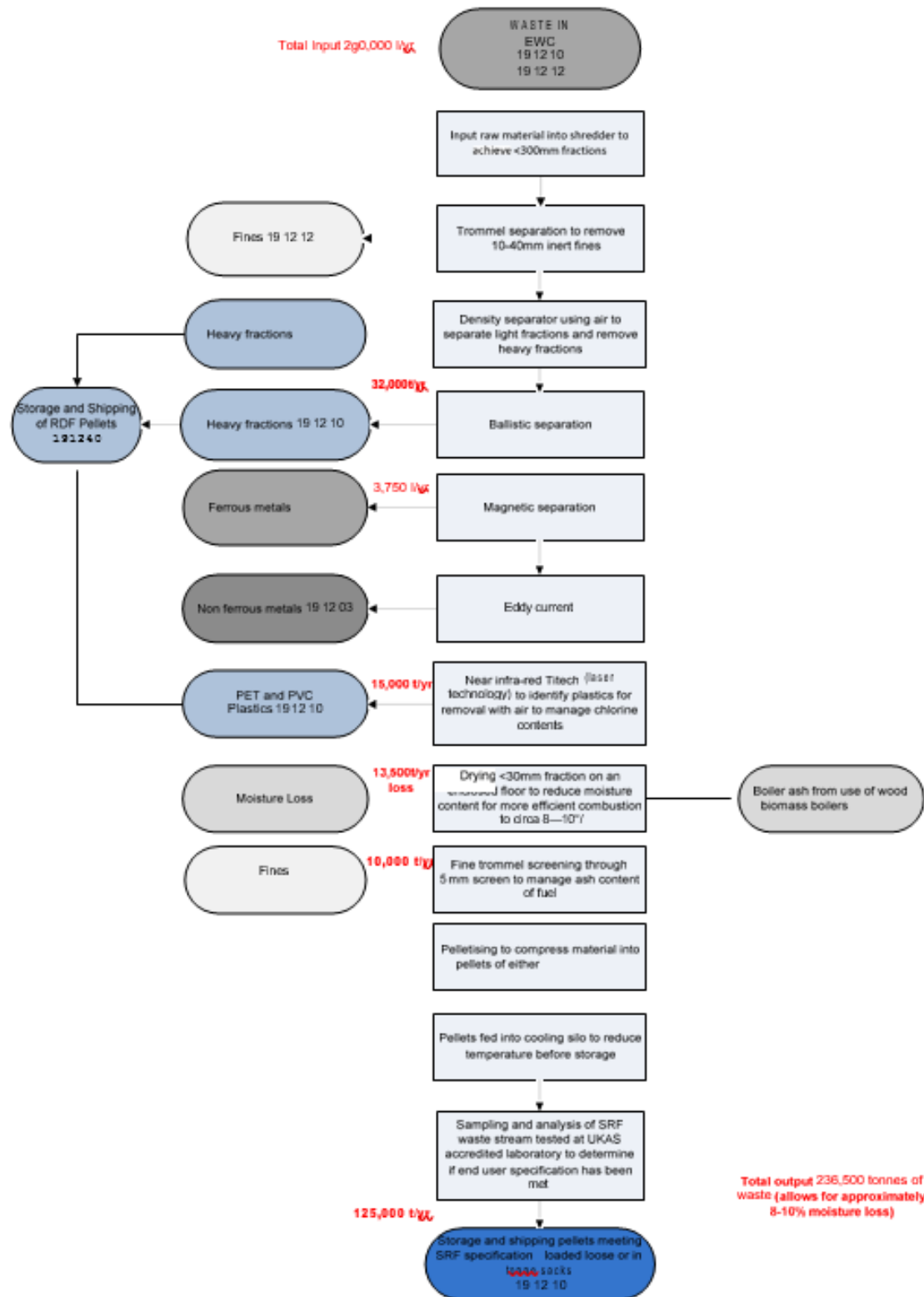
The waste management operations to be carried out at the site as specified in Annex I and Annex II of the Waste Framework Directive 2008, and specified in the existing Environmental Permit, are detailed below:

- R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced);

- R3: Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes);
- R4: Recycling/reclamation of metals and metal compounds;
- R5: Recycling/reclamation of other inorganic materials;
- D9: Physico-chemical treatment not specified elsewhere which results in final compounds or mixtures which are disposed of by an of the operations numbered D01 to D12;
- D15: Storage pending any of the operations numbered D1 to D14 (excluding temporary storage, pending collection, on the site where it is produced);
- D14: Repackaging prior to submission to any of the operations numbers D1 to D13.

An overview of the proposed activities is provided in **Figure 2-1** Process Flow Diagram and the Site Layout Plan (Drawing 02) contained in Appendix B.

Figure 2-1 Process Flow Diagram



3.0 POTENTIAL SOURCES ASSESSMENT

3.1 POTENTIAL SOURCE AND TYPES OF PEST

The potential sources of pest nuisance and the resultant pest types which could potentially occur as a result of Eco-Power's activities are provided in **Table 3-1** below.

Table 3-1 Potential Pest Sources and Types

| Process No. | Pest Source – Stage of Waste Process Operation | Associated Activities | Waste Types | Specific EWC Categories | Associated Risk | Location on Site – Refer to Drawings 02 and 05 | Likely Pest Type | |
|-------------|--|-------------------------|---|-------------------------|-----------------|--|--|--|
| 1 | Lorries transporting waste to the Installation | n/a | | | | Local Surrounding Area – Refer to Section 4; Figure 2 | | |
| 2 | Waste acceptance checks and weighing | n/a | | | Medium | Transwaste Melton Waste Park Entrance, Weighbridge and Waste Reception and Sampling Area | Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies. | |
| 3 | Storage of waste prior to processing | n/a | | | Medium-High | Feed Material Storage Area and Boiler House 2 | Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies. Attraction and nesting of rodents. | |
| 4 | Processing of waste | Shredding | Combustible Waste | 19 12 10 | | | | |
| | | Separating & screening | Wastes from Waste Management Facilities | 19 12 12 | Medium-High | Waste Processing Areas – Shed 1 | Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies. Attraction and nesting of rodents. | |
| | | Use of infra-red titech | | | | | | |
| | | Drying | | | Medium | Waste Processing Areas – Shed 1 Drying Floor/Screen Area | Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies. Attraction and nesting of rodents. | |
| 5 | Storage of processed waste | n/a | Fines | 19 12 12 | Medium- High | | Fly eggs, larvae, pupae and adults within the waste and attraction of adult flies. | |
| | | | RDF | 19 12 10 | Medium-High | | | |
| | | | SRF | 19 12 10 | Medium-High | Waste Storage Bays & Pellet Storage Area | | |
| | | | Ferrous Metals | 19 12 02 | Low-Medium | | Attraction and nesting of rodents | |
| | | | Non Ferrous Metals | 19 12 03 | Low-Medium | | | |

| Process No. | Pest Source – Stage of Waste Process Operation | Associated Activities | Waste Types | Specific EWC Categories | Associated Risk | Location on Site – Refer to Drawings 02 and 05 | Likely Pest Type |
|-------------|--|-----------------------|--------------------|-------------------------|-----------------|---|---------------------|
| 6 | Transportation of material off site | n/a | Fines | 19 12 12 | Medium- High | Local Surrounding Area – Refer to Section 4; Figure 2 | Attraction of flies |
| | | | RDF | 19 12 10 | Medium-High | | |
| | | | SRF | 19 12 10 | Medium-High | | |
| | | | Ferrous Metals | 19 12 02 | Low-Medium | | |
| | | | Non Ferrous Metals | 19 12 03 | Low-Medium | | |

Note: Feed material storage sheds 1, 2, 3 and Boiler House 2.

3.2 DESCRIPTION OF PEST TYPES

The types of pests likely to be present at the Installation are as follows:

- rodents which are attracted to the Installation by any litter present on site;
- depending on the time of year, type and handling, storage of waste prior to arrival at the Installation, there is potential for fly eggs, larvae, pupae and adults to be brought onto site within the waste itself;
- there is potential for the waste to attract flies present in the surrounding area; and
- if waste is stored at the site during warmer months, flies associated with the aforementioned routes will breed resulting in further generations within stored waste.

The most common species associated with Waste Management Facilities and which have the potential to generate complaints are outlined in **Table 3-2**.

Table 3-2 Common Fly Species Associated with Waste Facilities/Installations

| Fly Species | Typical Pest Status | Notes |
|--|--|---|
| Common housefly Lesser housefly | Can cause widespread and severe problems | Larvae found in poultry, pig, and calf manure, and in refuse. Adult readily disperses and enters buildings. |
| Blow flies (Bluebottles/Greenbottles) | Localised problems only | Larvae found in carrion and faecal material, commonly associated with putrescible waste. Adults tend not to disperse far. |
| Stable flies | Localised problems only | Larvae found in manure of large animals, e.g. cattle and pigs |
| Fruit flies | Localised problems only | A small (2mm) fly. Larvae found in rotting vegetation or vegetable waste. Tends not to disperse far |
| Cluster flies | Localised problems only | The larvae of these flies are not found in livestock or waste facilities, but the adults do enter buildings in the autumn, and may be confused with houseflies by complainants. |

3.3 RELATED PEST PROBLEMS

Flies, such as the common house fly, the lesser house fly and cluster flies, are of concern as they can transfer bacteria and lead to infestation as the average house fly can lay eggs in batches of 120-150 which subsequently hatch 8 hours later.

Rodents, such as rats, are of concern as they can carry diseases, contaminate food with their hair, dropping and urine resulting in food poisoning and spoilage, generate unpleasant odours and can damage materials from gnawing.

4.0 POTENTIAL RECEPTORS

4.1 CONSIDERATION FOR IDENTIFYING SENSITIVE RECEPTORS

To determine the level of pest impact which may arise from the Installation, the sensitivity of the receiving environment and potential receptors must be considered.

The degree of sensitivity in a particular location is based on the characteristics of the land use, including the reason why people are at the particular location (e.g. for work, recreation or residence). The degree of sensitivity also depends on the distance from the pest source as the closer the receptor is to the source, the higher the potential for nuisance will be at the location.

A summary of the immediate environmental setting is provided in **Table 2-1**. Potential sensitive receptors within a 1km radius of the EP boundary are shown on the Sensitive Receptors Plan (Drawing 03) contained in Appendix B.

Houseflies are known to disperse 800m in 3 to 8 hours; therefore, the sensitive receptors surrounding Eco-Power are at a high risk of being impacted if fly infestation occurs at the Installation. Significant problems will generally occur within 500m of the source.

Rats can travel up to 90m each night from their nesting site in search of food. As a result, Eco-Power will implement very high standards of pest control to prevent a negative impact on receptors.

Table 4-1 details the sensitive receptors which have been identified as particularly vulnerable to pest nuisance as they are located within 1km from Eco-Power's activities and therefore, these sensitive receptors are considered in this PMP.

Figure 4-1 Indicative Locations of Identified Sensitive Receptor within 1km of the Installation Boundary



Table 4-1 Potential Sensitive Receptors and Dust Assessment within 500m of installation Boundary

| ID | Name | Type | Grid Reference: Easting | Grid Reference: Northing | Distance from Site at Nearest Point (m) | Receptor Sensitivity |
|-----|--|--------------|----------------------------|-----------------------------|---|-------------------------|
| R1 | Transwaste Gibson Lane, Melton | Industrial | 496834 | 425491 | 0 E | High |
| R2 | Omya UK Limited | Industrial | 496744 | 425645 | 10 N | High |
| R3 | Melton Halt Motor Company Limited | Industrial | 496993 | 425633 | 166 NE | High |
| R4 | Melton Enterprise Park – Industrial Estate off Brickyard Lane | Industrial | 497159 | 425388 | 174 E | High |
| R5 | Unnamed Industrial unit and carpark adjacent to Heritage Landscape Centre | Industrial | 496872 | 425806 | 207 N | High |
| R6 | Heritage Landscape Centre | Commercial | 496934 | 425766 | 210 N | High |
| R7 | Residential area off Gibson Lane S | Residential | 496957 | 425912 | 247 NNE | High |
| R8 | Meltonwest Business Park –Industrial Estate off Jackson way | Industrial | 496461 | 425956 | 277 NNW | High |
| R9 | Sewage Works | Industrial | 496837 | 425145 | 284 SE | High |
| R10 | Riverside Industrial Estate off Gibson Lane | Industrial | 496710 | 424867 | 441 S | High |
| R11 | Melton Court – Industrial Estate off Wyke Way | Industrial | 496895 | 426215 | 517 N | Medium |
| R12 | Welton Water Sports Club | Recreational | 496183 | 425041 | 658 SW | Medium-High |
| R13 | Industrial Estate off Monks Way | Industrial | 497211 | 426154 | 660 NE | Medium |
| R14 | Residential property on Lowfield Lane | Residential | 496334 | 426294 | 766 NW | Medium |
| R15 | Residential property on Poolbank Lane | Residential | 496361 | 426397 | 831 NW | Medium |
| R16 | Residential property off Brickyard Lane | Residential | 497453 | 426150 | 841 NE | Medium |

| | | | | | | |
|-----|--|-------------------------------------|--------|--------|--------|--------------|
| R17 | Welton Water Adventure Centre | Recreational | 495864 | 425243 | 843 SW | Medium |
| R18 | Petrol Filling Station | Commercial | 496892 | 426455 | 851 N | Medium |
| R19 | Residential properties on Main Rd off Gibson Lane S | Residential | 497218 | 426369 | 888 NE | Medium |
| R20 | Residential Properties in Melton – Reynolds Close | Commercial | 496810 | 426528 | 923 N | Low - Medium |
| R21 | Public House | Commercial | 497536 | 426134 | 920 NE | Low - Medium |
| R22 | South Hunsley School and Sixth Form College and Sports Grounds | Education | 496810 | 426528 | 923 N | Low - Medium |
| R23 | Residential properties on Melton Old Road | Residential | 497284 | 426462 | 997 NE | Low - Medium |
| R24 | Properties on Melton Fields | Residential | 497535 | 426265 | 999 NE | Low - Medium |
| | Ecological Receptors | | | | | |
| E1 | Old drain | Water body | 496630 | 425135 | 378 S | High |
| E2 | Common drain | Water body | 460563 | 399258 | 580 SW | High |
| E3 | Welton Water | Water body - LWS | 495828 | 424928 | 678 SW | Medium |
| E4 | Humber Estuary | Water Body – SAC, Ramsar, SPA &SSSI | 496882 | 424662 | 830 s | Low - Medium |

Note:

Local Wildlife Site – LWS

Site of Special Scientific Interest - SSSI

Special Area of Conservation – SAC Special Protection Area - SPA

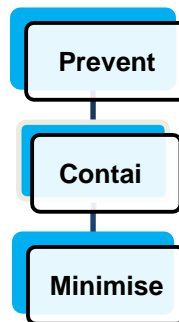
The Ramsar Convention on Wetlands of International Importance – Ramsar

5.0 OPERATIONAL AND PROCESS CONTROLS

5.1 PEST MANAGEMENT STRATEGY

Eco-Power's PMP strategy is to prevent the presence of pests through good working practices and the use of suitable process control measures, which represent BAT. A strategy based on the hierarchical structure shown in **Figure 5-1** will be used at the Installation.

Figure 5-1 PMP Strategy



5.2 STORAGE LOCATIONS

No storage or processing will be undertaken externally at the Installation. Operations are to be conducted within buildings fitted with roller shutter doors. The quarantines waste will be kept in the trucks waiting to be moved out of the site. the quarantines waste loaded trucks will be parked at the quarantine area. Therefore, no quarantined wastes will be stored externally.

Storage locations have been chosen in close proximity to the processing activities. This will enable lean and efficient processing with the shortest turnaround time. Therefore, reducing the storage time on site to a maximum of one week (3 days in warmer months (from April to October) and 7 days from November to March) reducing the likelihood of potential pest infestation to develop. Where possible, waste will be removed daily.

Storage locations and maximum waste storage times will remain unaltered during weekends, bank holidays and extended holidays.

The design of the Installation has taken into account the potential for the presence of vermin, such as through the sealing of all voids in the buildings to reduce the opportunity for nesting. The internal areas have been designed to reduce the amount of inaccessible areas for cleaning and preventing the build-up of waste behind internal structures or surfaces.

The concrete hardstanding will enable easy surface cleaning. The condition and integrity of the site infrastructure is regularly inspected and maintained as part of the Site EMS Day Diary Checks, a blank example of which is contained in Appendix II.

5.3 WASTE PRE-ACCEPTANCE PROCEDURE

Eco-Power will fully implement a documented waste pre-acceptance procedure, the purpose of which will be to ensure that wastes are subject to appropriate technical appraisal prior to acceptance at the site. In turn, this will ensure that unsuitable wastes are not accepted. These checks will be carried out before any decision is made to accept a waste.

When a waste disposal enquiry is received the following information must be provided in writing by the waste producer:

- details of the waste producer, including address and contact details;
- the specific process from which the waste derives; and
- an indication of the waste streams produced, their quantity, physical form, composition, properties, classification and description.

Pre-acceptance checks and subsequent assessments will be conducted. If requested, the waste producer must also provide representative audit analysis of the waste they have produced.

Following characterisation of the waste, a technical assessment of the waste will be undertaken with regard to its suitability for treatment at the Installation.

The Technically Competent Manager (“TCM”) will assess the waste producer’s audit report. A record of the assessment will be kept, its conclusions, and any actions taken.

Where the audit report is partially incomplete or inadequate, the Compliance Director will request and obtain the required information (or another audit report) prior to accepting the waste.

Should the Technical Assessment be undertaken by a third party, Eco-Power will:

- ensure that all details of the content of any audit tools or methodologies and assessment criteria used by that party are provided to Eco-Power;
- ensure that the methodology used by the third party meets Eco-Power’s own procedures in relation to pre-acceptance;

- keep a summary report from the third party which will demonstrate that pre- acceptance and assessment has been conducted on waste from the relevant producer with regard to the Installation which contains the following and that will be updated should any information contained within it change:
- confirmation of the producer types, waste types, containers etc.
- confirm a composite waste classification, description, composition, and properties for each waste stream and container type destined for the Installation, derived from each of the pre-acceptance audits and with reference to the permitted wastes for the site,
- confirmation of any issues that have been identified and what action has been taken with regard to the producers and wastes affected;
- annually audit a random and representative cross-section of the other party's pre- acceptance checks to ensure both the quality of pre-acceptance checks, subsequent assessments, waste classification and descriptions;
- keep records of all audits; and
- keep electronic records of the pre-acceptance report and assessment.

All records relating to pre-acceptance at the site will be kept for a minimum of five years at the Eco-Power's Site Office. Electronic copies will be held on site to ensure direct access to those records for cross-reference and verification at the waste acceptance stage.

5.4 WASTE ACCEPTANCE PROCEDURE

Eco-Power will fully implement a documented incoming waste acceptance procedure at the Installation, the primary purpose of which is to confirm that the characteristics of the incoming waste matches the information provided at the pre-acceptance stage.

There is a clear distinction between sales and technical staff roles and responsibilities. In the case that non-technical sales staff are involved in waste enquiries, a final technical assessment prior to approval is made.

The waste is delivered by several waste suppliers and will be weighed and issued with waste acceptance paperwork and the following information will be recorded:

- weight;
- date of arrival on-site;
- time;
- original producers' details (or unique identifier); and

- a unique reference number.

Waste is only accepted when there is sufficient treatment capacity within the Installation, proposed on a rapid processing manner. All waste is stored in a waste storage building which is near the main building and will be moved as required for the rapid processing.

All documents are checked by the Weighbridge Manager or nominated deputy prior to the waste being accepted.

Each delivery is visually checked prior to acceptance to ensure that the waste has been classified correctly. Additional visual checks are undertaken when the waste is emptied. This includes random sampling to check for any evidence of pest infestation.

Any non-conforming waste observed will be immediately removed off site and sent back to the supplier. If this is not possible, the non-conforming waste will be moved to the dedicated Quarantine Area which is illustrated on the Site Layout Plan (Drawing 02) in Appendix I and will be disposed of appropriately as soon as possible. This Quarantine Area is located away from waste storage or processing areas on site to prevent the spreading of any pests present. If deemed necessary, an enclosed container will be sourced, such as a lidded roll on roll off skip. The supplier will be contacted without delay to inform them of the non-conforming waste and identify measures that can be implemented to prevent recurrence.

Non-conforming waste is described as any waste that:

- the Installation is not authorised to accept;
- is not recorded on the accompanying waste documentation; or
- would not be expected, for any other reason, to be present.

Waste delivered to the site must be accompanied by a written description of the waste describing its composition and information specifying the original waste producer and process where required.

Eco-Power has developed a procedure containing clear and unambiguous criteria for the rejection of wastes, together with a written procedure for tracking and reporting such non-conformance.

Back-up copies of computer records are maintained off site at Eco-Power's Head Quarters in Bankwood Lane Industrial Estate.

5.5 STAFF TRAINING

Eco-Power has appointed a specialist pest management company, Marshalls Pest Prevention Limited, who provide pest consultancy support.

The role of the specialist pest management company is described in more detail in Section

5.8 of this PMP.

Part of the specialist pest management company role will be to provide ad hoc support and training to site personnel, such as the TCM and Operations Manager, as well as Site Operatives in the key aspects of pest management. The training will include the significance of flies and other pests, the use of control measures outlined in this PMP and also waste pre acceptance and acceptance procedures including waste rejection.

Site Operatives will be trained in the identification of pests and the procedure in order to escalate the findings to senior members of staff who will then take the necessary actions and request assistance from the specialist pest management company if required.

5.6 ENVIRONMENTAL MANAGEMENT SYSTEM

The Installation will be managed in accordance with an ISO 14001 certified EMS which will be reviewed regularly to ensure it remains appropriate and up to date.

The EMS details the waste pre-acceptance and acceptance procedures which are outlined in Section 5.3 and 5.4 of this PMP. This includes the procedure to follow in the event that non-conforming waste is identified within the incoming waste deliveries.

The EMS also details the maintenance of infrastructure, as well as the housekeeping techniques which will be employed at the Site. The housekeeping techniques are described in Section 5.7. of this PMP.

The Installation's TCM will ensure all site personnel are trained in the EMS and how the EMS relates to their specific job roles and day-to-day responsibilities. All staff members will be issued a copy of the EMS to review. A copy will also be available in the Site Office at all times.

5.7 HOUSEKEEPING TECHNIQUES

A housekeeping regime will be implemented throughout the Installation.

The maintenance required for operational equipment is outlined within the Eco-Power's Planned Preventative Maintenance Regime ("PPMR") contained within the Installation's EMS. The PPMR is contained in Appendix III for ease of reference.

The infrastructure inspections and maintenance will be undertaken as part of the EMS Day Diary Site Checks (see Appendix II) to ensure buildings, the drainage system and concrete surfacing are in good condition. Buildings and access points, such as roller shutter doors, need to be maintained to prevent ingress of pests into the buildings

storing and/or processing waste. Site surfacing needs to be integrity checked to enable thorough surface cleaning preventing build-up of debris.

Additionally, pipes will be inspected and maintained to prevent leakage. If leaks are identified, these will be fixed immediately to prevent standing water attracting pests.

Housekeeping techniques will also include the removal of residual dust, any excess waste material fines and general debris/litter each time each bay is emptied before re-filling. Roadways and walkways will also be kept clear.

Daily cleaning of surfaces, including immediately responding to any spillages using the available spill kits and monthly deep cleaning will be performed.

Any general waste generated on site from the offices will be stored in closed lidded skips and collected for disposal off site regularly to prevent accumulation of general waste in close proximity to the operational areas.

5.8 CONTROL MEASURES SPECIFIC TO PELLETISED FINISHED PRODUCT

The following non-chemical fly prevention measures will be implemented:

- ensure the pelletised finished product is dated and good stock rotation is followed. Storage times for SRF and Refuse Derived Fuel (“RDF”) will be kept at a maximum of 1 week during summer months;
- SRF and RDF will be stored internally to prevent water ingress;
- SRF pellets will be stored in such a way to enable effective insecticide treatment if deemed necessary.

5.9 SPECIALIST PEST MANAGEMENT COMPANY

A specialist pest management company Marshalls Pest Prevention Limited are retained on an annual contract by Eco-Power to provide expert assistance and routine site inspections. They are contactable on 07988104362 at any time.

The specialist pest management company ensures that the appropriate controls are being implemented to prevent pest nuisance problems occurring.

A schedule of regular visits will be set up which will be the responsibility of the Compliance Director to ensure these visits are undertaken as per the agreed schedule. Records of the visits will be retained by Eco-Power.

The pest contractor will also be available on emergency call out in the event of specified incidences of pests.

If treatment is required, Eco-Power will follow the advice and assistance provided by the specialist pest company on the most appropriate treatment option and will also consult the EA during the process of selection.

5.10 ACTIONS TO MINIMISE THE AGE OF THE WASTE

The risk of fly infestation will be high during periods of hot weather, as the incoming waste is likely to be infested and fly development will be rapid. Parts of the site where the process generates elevated temperatures may be at risk of infestation throughout the year. The control measures will be used to minimise the rises:

- Monitor adult fly and larval numbers in key areas of site.
- Ensure swift processing of waste and avoid extended storage of unprocessed waste.
- Refuse the waste if it's likely to cause fly infestation - this would be dealt with as a waste acceptance issue under the conditions of the permit.
- Use sheeting or other containment when storing waste/waste products that are highly attractive to flies.
- Where possible, reduce fly movement out of the building e.g. use fast roller doors and maintaining negative air-pressure within waste treatment areas to reduce fly egress.
- Ensure site staff are trained in fly monitoring, and aware of the importance of fly prevention.

6.0 SITE MONITORING PLAN

6.1 GENERAL PEST MONITORING

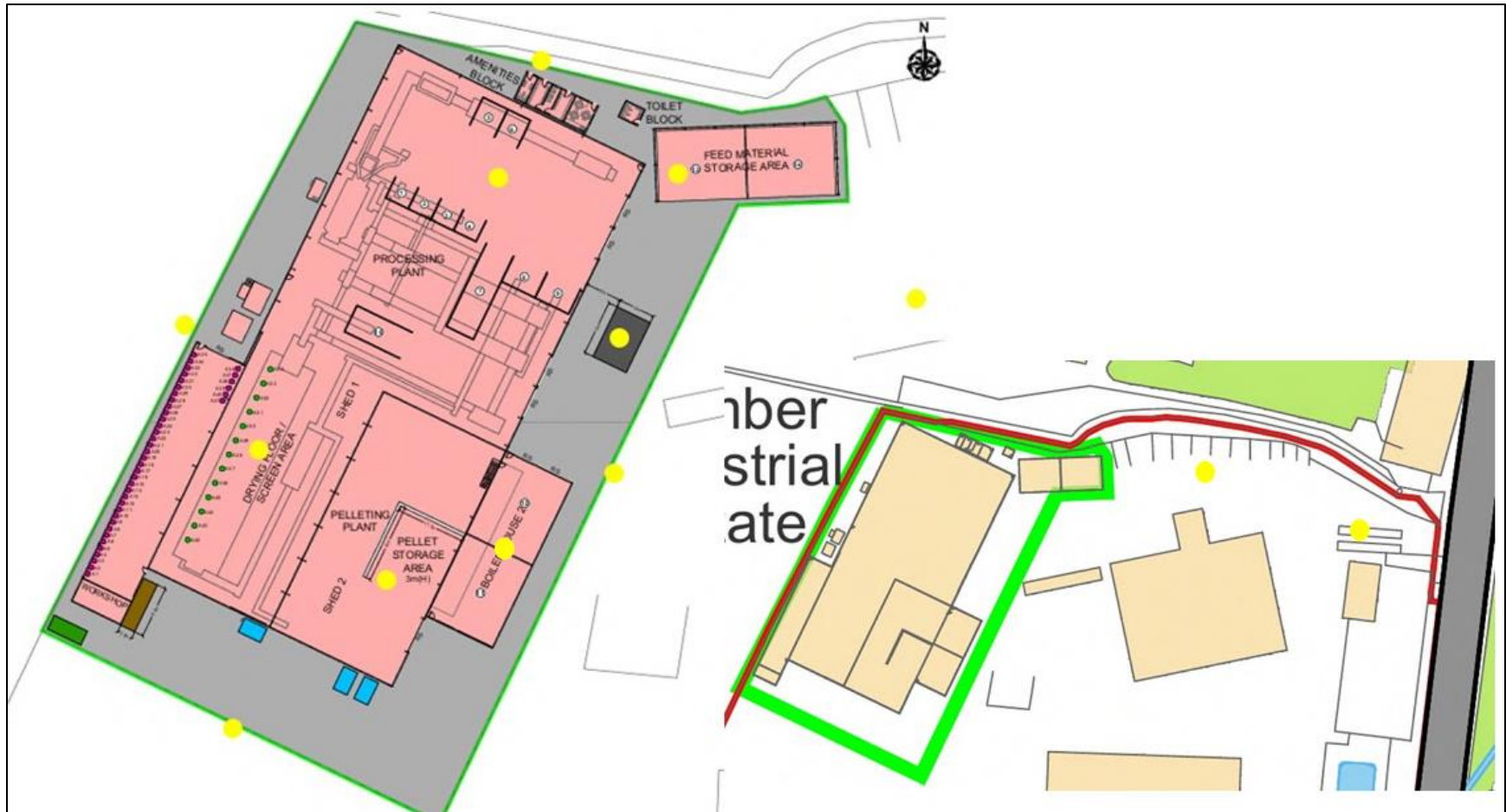
Daily inspections are undertaken to monitor for the presence of all pests. This is undertaken by the Operations Manager or nominated deputy. A blank example of the Daily Site Monitoring Check Sheet is provided in Appendix IV of this PMP.

The locations of pest monitoring on site associated with the activities and the possible pest types are provided in **Table 6-1** and shown as yellow symbols in **Figure 6-1** Pest Monitoring Locations.

Table 6-1 Pest Monitoring Locations

| Location on Site | Associated Activity | Type of Pest Monitored |
|--|--|------------------------|
| External roads specifically during waste transportation to and from the Installation | Transportation of unprocessed waste and processed waste/finished product (i.e. RDF and SRF). | Flies - adults |
| Internal Roadways, Weighbridge and Waste Reception and Sampling Area | Transportation and weighing of unprocessed waste and processed waste/finished product. | |
| | Inspection and sampling of unprocessed waste prior to acceptance onto site. | |
| Waste Storage Areas | Storage of unprocessed and processed waste/finished product. | Flies – adults |
| Waste Processing Areas | Shredding, separating, screening, use of infra-red titech, drying and pelletising. | Rodents |
| Quarantine Area for Non-Conforming Waste (only if applicable) | Storage of non-conforming waste | |
| Quarantine Area for Fire Prevention Plan (only if applicable) | Storage of waste during fire event | |
| Environmental Permit Boundary Perimeter – random monitoring north, south, east and west along boundary | n/a | |

Figure 6-1 Pest Monitoring Locations



If pests are identified during this site inspection, senior managers will be alerted and indicative corrective and preventative measures will be selected from those outlined in **Table 8-1** in collaboration with the specialist pest management team.

The results from the general pest monitoring will be consulted in conjunction with the fly inspection record which is described below.

6.2 FLY INSPECTION MONITORING

The Site Manager or nominated deputy undertakes monitoring three times per week from April to October. This involves the counting of adult flies per waste pile. The number of adult flies on the long side of each waste pile is counted and actual numbers are recorded. For ease of monitoring, waste is stored in accessible appropriately sized piles. The monitoring is recorded on the Fly Inspection Record Form. A blank example is provided in Appendix V of this PMP.

An increasing number of flies will indicate the potential beginning of a fly nuisance problem. A baseline during both cooler winter months and warmer summer months will be established.

7.0 EMERGENCY SCENARIO CONTINGENCY MEASURES

7.1 CONTINGENCY MEASURES

In the event of an accident/unexpected incident such as fire, flooding, breakdown and staff absences, the following emergency measures detailed in **Table 7-1** will be implemented to ensure strict pest control measures are upheld.

Table 7-1 Emergency Scenario contingency Measures

| ID | Name |
|-------------------------------|--|
| Fire | <p>There is a risk of the accumulation of waste which cannot be processed. If safe to do so, Eco-Power will arrange for the movement of waste off site to another appropriately licenced Facility or Installation if storage times of 1 week in warmer months (April to October) and storage times of 3 months in the remaining months are likely to be exceeded;</p> <p>Waste will not be accepted at the site until operations re-commence. Eco-Power will inform their waste suppliers and halt further waste during outbreak of the fire.</p> <p>Once the site or affected area is deemed safe by the Fire and Rescue Service (“FRS”), repairs will be undertaken and/or replacement equipment will be sourced. Start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of activities.</p> |
| Flooding | <p>Flooding is more likely during the winter wetter months in contrast to when pest nuisance is generally accepted to be more likely in the warmer drier months from April-October. Nevertheless, the following contingency measures would be implemented to reduce the impact on the environment from pest nuisance if flooding was to occur at the Installation:</p> <p>Depending on the extent of the flooding, the waste currently on site will be moved to processing areas which are not affected.</p> <p>If processing operations are not possible, Eco-Power will arrange for waste currently stored at the site exceeding 1 week in summer months (Apr-Oct) and 3 months for the remaining months to be sent to another appropriately licenced Facility or Installation not affected by flooding;.</p> <p>Movement on site will be restricted and waste will not be accepted at the site until normal operations resume.</p> |
| Plant and Equipment Breakdown | <p>Eco-Power’s PPMR (See Appendix III) should prevent any unplanned breakdown of equipment or machinery. However, if this is to occur unexpectedly, the following contingency measures would be implemented to reduce the impact on the environment:</p> <p>There is a risk of the accumulation of waste which cannot be processed. Eco-Power will arrange for the movement of waste off site to another appropriately licenced Facility or Installation if storage times of 1 week in the warmer months (Apr to Oct) and storage times of 3 months in the remaining months are likely to be exceeded</p> <p>Waste will not be accepted at the site until operations re-commence. Eco-Power will inform waste suppliers.</p> <p>Where possible, spare parts will be held on site to undertake repairs as soon as possible. If spare parts need to be outsourced, this will be the responsibility of the Site Manager and if required, specialist contractors will be contacted to undertake any complex repair work.</p> |

| | |
|-----------------------|--|
| | <p>Once the issue has been resolved, start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of activities.</p> |
| <p>Staff Absences</p> | <p>Eco-Power has assigned responsible persons and deputies in the case of staff absence</p> <p>At the start of each working day, the Operations Manager will instruct the deputy in the case of staff absence to ensure all measures outlined in this PMP are undertaken.</p> <p>Senior Managers are fully trained in the PMP and are available to attend site out of normal working hours (8am-6pm).</p> <p>The specialist pest management company is also available on emergency call out to provide assistance.</p> |

8.0 COMMUNITY LIAISON AND RESPONSE TO COMPLAINS

8.1 COMMUNITY LIAISON

Where possible, spare parts will be held on site to undertake repairs as soon as possible. If spare parts need to be outsourced, this will be the responsibility of the Site Manager and if required, specialist contractors will be contacted to undertake any complex repair work.

Once the issue has been resolved, start-up of equipment will be undertaken gradually by trained personnel to ensure optimal performance of equipment prior to full commencement of activities.

8.2 RESPONSE TO COMPLAINTS

8.2.1 Initial Response – Data Gathering

Pest infestation can occur suddenly and develop rapidly, therefore, Eco-Power has appointed a pest management specialist who will regularly attend site. This is a proactive measure to prevent a pest problem occurring at the Installation in turn preventing complaints being received. The detailed role of the specialist pest management company is provided in Section 5.9 of this PMP.

If a pest complaint is received at the Installation either directly from a member of the public, EA or East Ridings of Yorkshire Council, the complaint will be fully investigated within 8 working hours of receipt of the complaint. Eco-Power will request as much information as possible from the complainant, such as:

- date and time pest problem first identified;
- location of complainant;
- detail of the pest; and
- frequency or intensity of problem.

This information will then help inform and structure the investigation which will be undertaken on site.

8.2.2 Pest Complaint Investigation

An investigation will be launched on receipt of a pest complaint or if increased numbers of pests are recorded during the monitoring inspections undertaken by Eco-Power personnel at the Installation.

The investigation will include the following:

- undertaking a site inspection to establish whether any pests can be identified;
- speaking with operators to establish any changes to production, waste types or waste piles;
- any recorded non-conforming waste during waste acceptance checks;
- any observations of pest infestation recorded on the Daily Monitoring Check Sheet (see Appendix IV) or from any member of staff or contractor who has attended site;
- if flies are the pest of concern, review the number of adult flies recorded on the Fly Inspection Record form (see Appendix V) to identify if there are any trends of increased numbers being observed and evaluate the effectiveness of any action either previously or currently taken; and
- undertaking random inspections of waste on site to identify any sources of pests.

8.2.3 Pest Complaint - Corrective and Preventative Measures

Once the investigation has been completed, the complaint substantiated and the source identified, Eco-Power in collaboration with their specialist pest management company will determine and implement suitable corrective and preventative measures. The type and level of corrective and preventative measures will be dependent on the root cause and scale of the pest occurrence. However, **Table 8-1** provides an indication of the type of corrective and preventative measures which will be implemented in certain scenarios.

The EA will be informed of the pest nuisance complaint investigation findings and proposed corrective and preventative measures.

Table 8-1 Indicative Corrective and Preventative Measures

| Scenario | Likely Pest Type | Corrective Measure(s) | Preventative Measure(s) | Responsible person |
|------------------------------------|------------------|---|--|---|
| Suspected contaminated waste | Flies | Remove waste to Quarantine Area and the removal of waste immediately actioned by Operations Manager to ensure it is removed at the earliest convenience. | Review waste pre-acceptance and acceptance procedures to ascertain effectiveness and whether these procedures, as well as the PMP have been followed. If failings are identified, Eco-Power and the specialist management company will amend procedures and roll out full pest management raining refresher courses. | Operations Manager, Compliance Director and TCM |
| | | <p>The maximum storage time of suspected contaminated waste within the Quarantine Area will be 8 hours.</p> <p>This is due to a quarantine area having the potential to be <u>counter-productive</u> as elevated temperatures and humidity can accelerate fly development and fly egress still occurs. Therefore, the time quarantined will be minimised as far as practicable.</p> | <p>Eco-Power will contact the waste company which supplied the contaminated waste, ask for follow up investigation and the corrective and preventative actions being undertaken. Eco-Power will also work closely with the EA Inspector for the site which supplied the contaminated waste.</p> <p>If Eco-Power deem the response from the waste supplier unacceptable, the supplier will be replaced by an alternative.</p> | |
| Increased number of pests detected | Flies | <p>If required, appropriate treatment will be undertaken by the specialist pest control company. The treatment will depend on the exact circumstances including specific pest and source. The most relevant options for treatment include:</p> <ul style="list-style-type: none"> ▣ residual spraying using a coarse insecticide spray to target surfaces; and/or ▣ space-spraying in which application of non-residual and fast acting insecticide as a fine mist is blown at the target with a <u>motorised</u> sprayer, such as a thermal fogging. This targets adult flies. This has a short-term effect and must be applied frequently, sometimes daily. The drift of outdoor airborne spray must be carefully risk assessed prior to use to consider the impact on sensitive receptors. | <p>Thorough clean of waste processing and storage areas to remove any accumulation of waste.</p> <p>Follow up visits from the specialist pest control company will be arranged at a greater frequency than normal site visits to monitor the ongoing effectiveness of the treatment.</p> | Operations Manager, Compliance Director and TCM |

| Scenario | Likely Pest Type | Corrective Measure(s) | Preventative Measure(s) | Responsible Person |
|--|------------------|---|--|---|
| Increased number of pests detected (Cont.) | Flies | Routine use of insecticide is not the preferred method due to pests developing resistance, therefore, these methods will only be used when deemed <u>absolutely necessary</u> . | See above. | Operations Manager, Compliance Director and TCM |
| | | If required, insecticide fly baits can be applied to non-absorbent boards as vertical strips. These will only be used if <u>absolutely necessary</u> and top up bait will be required. Eco-Power will follow the advice and assistance provided by the specialist pest company on the most appropriate treatment option and will consult the EA during the process of selection. | | |
| Increased number of pests detected | Rodents | Any waste which is thought to be attracting rodents must be placed in sealed containers. The specialist pest management company will select the appropriate corrective measure which may include bait and traps. A multitude of different traps and locations will be selected by the specialist pest management company. | The site will be reviewed to identify any unnecessary entry points. These will then be eliminated by sealing any openings in walls, doors, roof panels etc. A deep clean of all areas will be undertaken to prevent poor sanitation attracting rodents. | Operations Manager, Compliance Director and TCM |

8.2.4 Pest Complaint – Evaluation of Corrective and Preventative Measures

The frequency of visits by the specialist pest management company will be increased following identification of the pest source and associated corrective and preventative measure implementation. During these visits, the overall effectiveness of the corrective and preventative measures will be evaluated, and further measures proposed if deemed necessary.

During the evaluation of the corrective and preventative measures, a reduction in complaints received and number and type of pests noted on the daily monitoring check sheet and fly inspection record sheet (if appropriate) should also be clearly identifiable.

8.2.5 Timescales

The timescales associated with the complaint's procedure are as follows:

- investigate complaint – within 8 working hours;
- corrective (including treatment) and preventative measures proposed – within 2 working days; and
- treatment follow up to ensure successful close out.

8.2.6 Feedback to Complainant

Eco-Power recognise that offering credible reassurance and demonstrating that complaints are taken very seriously can be extremely advantageous. Eco-Power will discuss the corrective and preventative actions which have been implemented to address any complaints and investigation findings.

8.2.7 Escalating complaints

If complaints are received daily from multiple complainants over the period of 5 days and Eco-Power have undertaken an investigation which substantiates that the site is the source of the pest nuisance problem, senior managers will hold an emergency meeting to discuss and agree on the ceasing of operations until the problem can be rectified. The EA will be informed of this decision. However, the robust measures outlined in this PMP should prevent this from being necessary.

8.3 RECORDS

8.3.1 PMP Records

PMP records are kept in accordance with the procedures established as part of the EMS.

8.3.2 Complaints

Information which must be recorded will include but not limited to:

- an overview of the complaint received;
- investigation findings and associated actions raised;
- sensitive receptors in particular the type of receptors, location relative to the suspected pest source and an assessment of the impact of pest on the receptors;
- identification of any circumstances which compromise the ability to prevent pest nuisance and a description that will be taken to minimise the impact;
- timescales associated with the complaint;
- complainant feedback and on-going correspondence; and
- follow up to ensure close out of any preventative and corrective actions.

8.3.3 Treatment

If treatment is deemed necessary by the specialist pest management company, detailed records will be kept. The type of information recorded will include:

- date and time of application;
- location on site of application;
- treatment operator's name;
- type of treatment applied and products used;
- volume of products used;
- application technique; and
- follow up visit findings.

8.3.4 Feedback

Feedback to residents

Discuss the action taken with the affected residents. Advise them that treatment is likely to take several weeks to be fully effective, and they should continue to monitor until otherwise advised or they are confident the problem has been resolved.

Follow up visits to site

For sites where action was required, revisit the site within two weeks to assess the implementation of agreed actions and their effectiveness.

If the action taken on the site is inadequate or ineffective continue to work to address the problems. Ask yourself the following questions:

- Are there issues that were missed at the initial visit?
- Are there fly breeding areas that were overlooked, for example, lesser housefly larvae can be very difficult to locate?
- Does there appear to be resistance to the insecticide products used?
- Are there other significant fly-breeding sites nearby which have not yet been investigated?

Conclusion

Once the problem is resolved, advise all parties of the outcome of the investigation, action taken and proposals to avoid a recurrence. Advise complainants to contact us again if problems recur.

9.0 PMP REVIEW

The continuing effectiveness of the PMP will be reviewed by the Company Director annually or immediately if a substantiated complaint is received and it is clear that pest control measures have failed.

If a complaint is substantiated a full review of the PMP will be carried out and any required improvements will be made.

The reviews will take into account compliance records, complaints history, site records and any recent sensitive developments on neighbouring land. The plan will be updated, as necessary, including any changes to the control measures.

APPENDIX A THE 2ND EA SCHEDULE 5 LETTER

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.

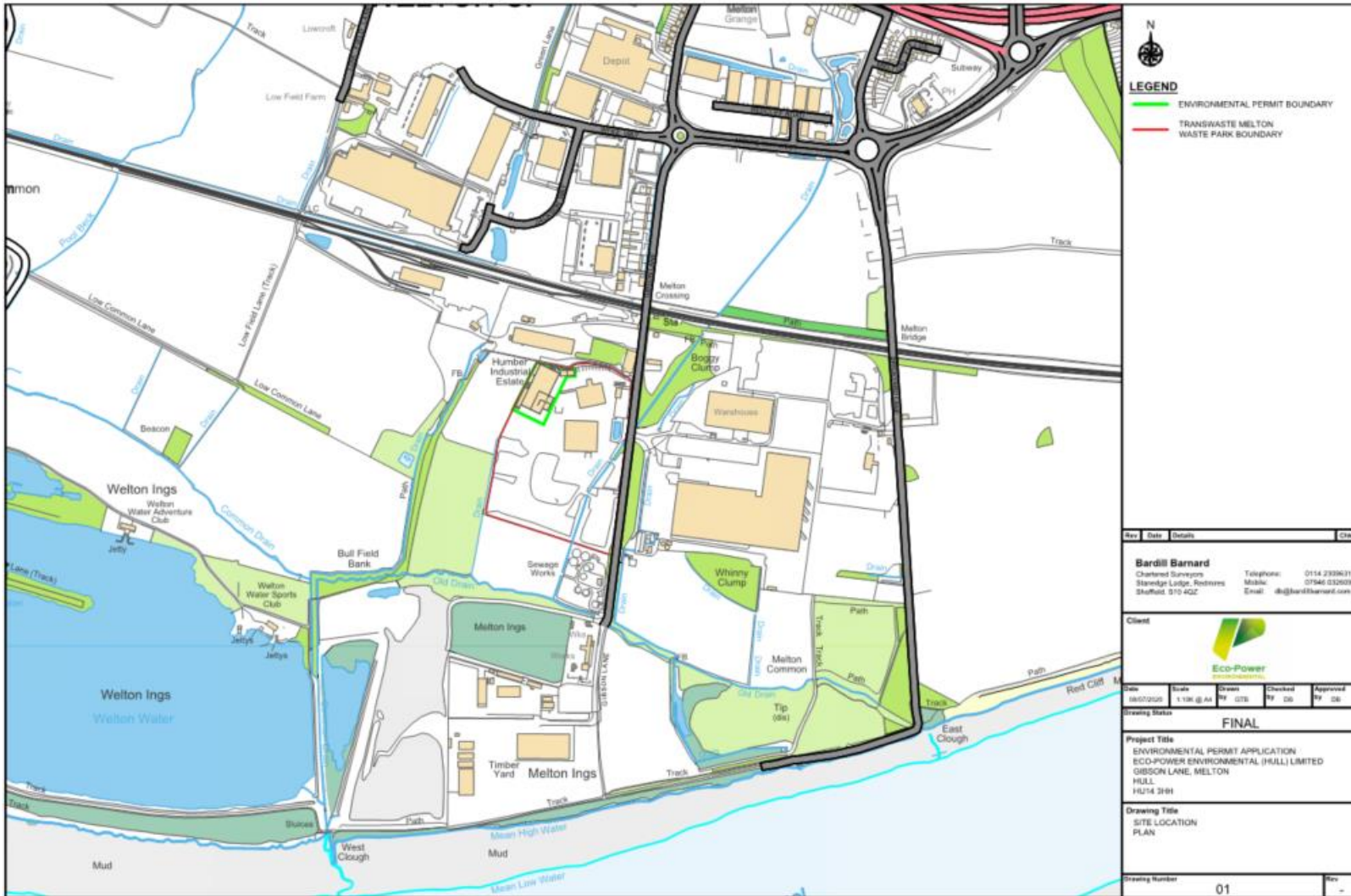
You must compare the following:

- 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.

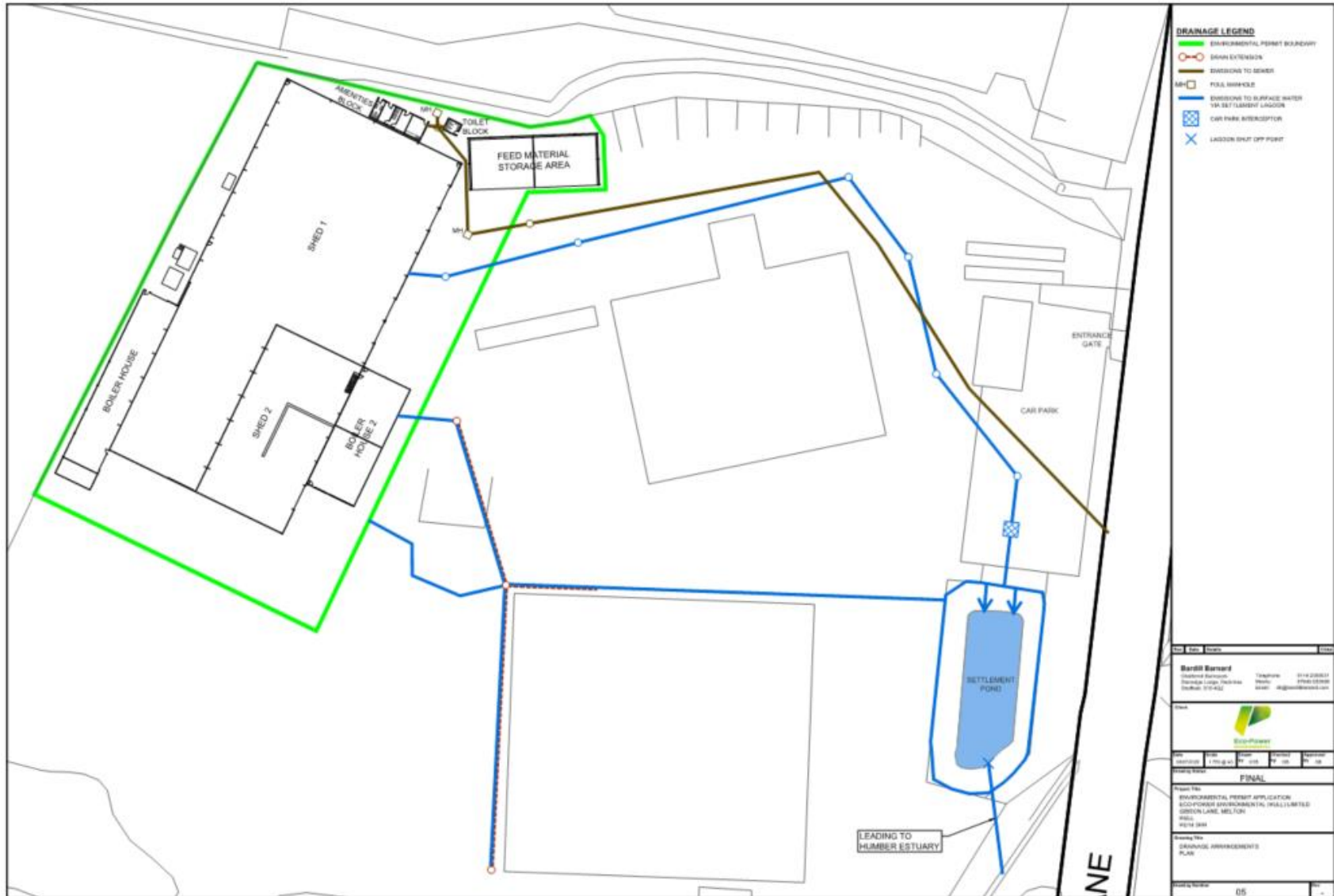
End of the 2nd Schedule 5.

APPENDIX B DRAWINGS



| Rev | Date | Details | Drawn |
|--|------------|---------|--|
| <p>Bardill Barnard Chartered Surveyors Stonehenge Lodge, Redmires Sheffield, S10 4QC</p> <p>Telephone: 0114 2339631 Mobile: 07946 032009 Email: bb@bardillbarnard.com</p> | | | |
| <p>Client</p>  <p>Eco-Power Environmental Services</p> | | | |
| Date | Scale | Drawn | Checked |
| 18/07/2020 | 1:10k @ A4 | TF GTS | TF DS |
| <p>Approved</p> <p>TF DS</p> | | | |
| <p>Drawing Status</p> <p style="text-align: center;">FINAL</p> | | | |
| <p>Project Title</p> <p>ENVIRONMENTAL PERMIT APPLICATION ECO-POWER ENVIRONMENTAL (HULL) LIMITED GIBSON LANE, MELTON HULL HU14 3HH</p> | | | |
| <p>Drawing Title</p> <p>SITE LOCATION PLAN</p> | | | |
| <p>Drawing Number</p> <p style="text-align: right;">01</p> | | | <p>Rev</p> <p style="text-align: right;">-</p> |





APPENDIX C SITE EMS DAY DIARY CHECKS



SITE EMS DAY DIARY

| RECORD THE FOLLOWING | YES | NO | NOTES BELOW |
|---|-----|----|-------------|
| Site diary, Duty of care, Environmental Monitoring Records kept secure in site office | | | |
| Fabric of existing buildings and hard standing areas in good condition | | | |
| Site lighting in working condition | | | |
| End of week walk over survey – All of the following in good condition? Hard Surfacing, drainage structures, and buildings. (note any silting or blockages) | | | |
| Any rejected loads of wastes identified as being outside of the permit (record any) | | | |
| Any escapes of dust , fibres or particulate likely to pollute neighbours? (record any results of visual monitoring) | | | |
| Any noise complaints? If yes record actions taken | | | |
| Any spillages of materials onto highway? If yes, record actions taken | | | |
| Daily inspection of perimeter. Any litter escapes? If yes, retrieve within 24 hours and record below | | | |
| OTHER SIGNIFICANT EVENTS TO BE RECORDED | | | |
| Plant breakdowns and maintenance | | | |
| Emergencies – such as fire or major infrastructure problems | | | |
| Site inspections | | | |
| Damage to security provision and action taken | | | |
| Spillages of materials and action taken | | | |
| Daily weather conditions – record below | | | |
| Dispatch of records | | | |
| New Complaints received today and recorded in complaints log | | | |

| | | |
|------------|---------------------------------|--|
| WEATHER | Wind strength & direction | |
| CONDITIONS | Sunny, dry, showers, rain, snow | |

NOTES (continue overleaf if required)

DATE



Refer to Daily Site Monitoring Checksheet forming part of Emissions Management Plan, Odour Management Plan and Pest Management Plan

APPENDIX D PLANNED PREVENTATIVE MAINTENANCE REGIME

PLANT OPERATING HOURS TIME TABLE



| Weekly View | | | Monthly View | | | Yearly View | | |
|-----------------------------------|-------|------------------|--------------------------------------|-------|--------------------|-----------------------------------|-------|---------------------|
| Day | Hours | Running Total | Month | Hours | Running Total | Year | Hours | Running Total |
| Monday | 20 | 20 | Oct-19 | 540 | 540 | 1 | 6,300 | 6,300 |
| Tuesday | 20 | 40 | Nov-19 | 520 | 1,060 | 2 | 6,300 | 12,600 |
| Wednesday | 20 | 60 | Dec-19 | 520 | 1,580 | 3 | 6,300 | 18,900 |
| Thursday | 20 | 80 | Jan-20 | 540 | 2,120 | 4 | 6,300 | 25,200 |
| Friday | 20 | 100 | Feb-20 | 500 | 2,620 | 5 | 6,300 | 31,500 |
| Saturday | 20 | 120 | Mar-20 | 520 | 3,140 | 6 | 6,300 | 37,800 |
| Total Weekly Running Hours | | 120 hours | Apr-20 | 520 | 3,660 | 7 | 6,300 | 44,100 |
| | | | May-20 | 520 | 4,180 | 8 | 6,300 | 50,400 |
| | | | Jun-20 | 540 | 4,720 | 9 | 6,300 | 56,700 |
| | | | Jul-20 | 540 | 5,260 | 10 | 6,300 | 63,000 |
| | | | Aug-20 | 520 | 5,780 | 11 | 6,300 | 69,300 |
| | | | Sep-20 | 520 | 6,300 | 12 | 6,300 | 75,600 |
| | | | Total 12 Months Running Hours | | 6,300 hours | Total Yearly Running Hours | | 75,600 hours |

Rough Guide, not taken out bank holidays or breakdowns only week-end shutdowns

*Note: Machine Running time based on 20 hours per day Monday- Saturday. Not taking into account bank holidays or Machine break downs

Service/ Maintenance checklist For RDF Processing Plant Including Conveyor Belts



| Work To be Carried out | Frequency | Each Shift (10 Hours) | Daily (20 Hours) | Weekly (120 Hours) | 250 hours | 500 hours | 750 hours | 1000 hours | 1250 hours | 1500 hours | 1750 hours | 2000 hours | 2250 hours | 2500 hours | 2750 hours | 3000 hours | 3250 hours | 3500 hours | 3750 hours | 4000 hours | 4250 hours | 4500 hours | 4750 hours | 5000 hours | 5250 hours | 5500 hours | 5750 hours | 6000 hours | 6250 hours | 1 Year |
|---|------------|-----------------------|------------------|--------------------|-----------|-----------|-----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|--------|
| Cleaning Check List | Each Shift | █ | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Visual Inspection of Machines | Each Shift | █ | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Check for Excessive Heat on All Motors | Daily | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Make Sure Belts are Not Tracking | Daily | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Scrapers Should be Adjusted at the Head Drum on Each Conveyor | Daily | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cleaning Checks | Weekly | | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Maintenance Check of Machines | Weekly | | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Check All Gear Box Levels | Weekly | | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All Bearings Greased | Weekly | | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Clean All Internal Chutes | Weekly | | | █ | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Replace Automatic Dispensers on Nord Drive Systems | 3000 Hours | | | | | | | | | | | | | | | █ | | | | | | | | | | | | | | █ |
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APPENDIX E DAILY SITE MONITORING CHECKSHEET

DAILY SITE MONITORING CHECKSHEET

| ASPECT | COMMENTS | ACTION TAKEN | RESPONSIBLE PERSON |
|---|----------|--------------|--------------------|
| Meteorological Conditions | | | |
| Details of Operations | | | |
| Visual Observations | | | |
| Dust Obs - Note Monitoring No. Application of Dust Suppression Methods | | | |
| Presence of pests, litter or mud | | | |
| Presence of noise and/or vibration | | | |
| Presence of odour - Monitoring No. & Level Scoring | | | |
| Any Other Comments: | | | |

Name: _____

Signature: _____

Date _____

APPENDIX F FLY INSPECTION RECORD FORM

DAILY SITE MONITORING CHECKSHEET

| ASPECT | COMMENTS | ACTION TAKEN | RESPONSIBLE PERSON |
|--|----------|--------------|--------------------|
| Meteorological Conditions | | | |
| Details of Operations | | | |
| Visual Observations | | | |
| Dust <u>Obs</u> - Note Monitoring No. Application of Dust Suppression Methods | | | |
| Presence of pests, litter or mud | | | |
| Presence of noise and/or vibration | | | |
| Presence of odour - Monitoring No. & Level Scoring | | | |
| Any Other Comments: | | | |

Name: _____

Signature: _____

Date _____

APPENDIX G FLY INSPECTION RECORD – APR TO OCT

FLY INSPECTION RECORD – APR TO OCT

| DAY | NUMBER OF ADULT FLIES IDENTIFIED ON LONG SIDE OF 10 DIFFERENT BALES | | | | | | | | | | DESCRIPTION OF FINDINGS | ACTION REQUIRED Y or N | ACTION TAKEN | RESPONSIBLE PERSON |
|---------------------|---|---|---|---|---|---|---|---|---|----|-------------------------|---------------------------|--------------|--------------------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | | | | |
| MON | | | | | | | | | | | | | | |
| WED | | | | | | | | | | | | | | |
| FRI | | | | | | | | | | | | | | |
| SUN | | | | | | | | | | | | | | |
| Any Other Comments: | | | | | | | | | | | | | | |

Name: _____

Signature: _____

Date _____

APPENDIX H REPORT TERMS & CONDITIONS

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The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accept no liability for issues with performance arising from such factors.