



Joanna Holland

Our Ref: EA/EPR/GP3636QX/A001

Wardley Biogas Ltd
10 Bridge Road
Stokesley
Middlesbrough
TS9 5AA

Date: 12 November 2018

Dear Ms. Holland,

Pre-application checks – Basic service

I am pleased to provide you with your basic level of pre-application advice for Wardley Biogas Anaerobic Digestion Facility as requested.

As part of this service we have provided you with the following information:

Application Reference number	EA/EPR/GP3636QX/A001
Habitats screening	Habitats screening (see attached)
Baseline fee required	See Appendix 1 below
Forms required to be submitted	See Appendix 1 below
Additional documents required	See Appendix 1 below
Additional information	<p>The initial local compliance officer for the pre-application discussions will be Tony Farthing. His contact email is: tony.farthing@environment-agency.gov.uk</p> <p>Once you submit an enhanced pre-application request, a permitting officer from the nearest permitting centre to the proposed site will be allocated to your case. They will contact you to arrange a pre-application meeting at that time.</p>

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to a full technical check during duly making and determination, and additional information may be required based on your detailed submission and site specific requirements.

When you are ready to submit your application please quote the above reference number.

Your completed application can be sent via email to psc@environment-agency.gov.uk

Or by post to:

Permitting Support Centre, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF.

A complete application must contain the following information;

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

If you decide you would prefer our enhanced service (this service requires a fee) please visit GOV.UK where you can complete an online referral form.

We look forward to working with you on this project.

If you have any questions please find my contact details below.

Yours sincerely,

Dr Abraham Ejim
Principal Permitting Officer
National Permitting Service
abraham.ejim@environment-agency.gov.uk

Appendix 1 – Information to support permit application

Please use the requirements stated within the application forms (see below) as a guide to what accompanying documents are needed with your application.

Bespoke installation requirements

- **Application forms**

The following forms are required for a new bespoke installation application:

Form A (about you), available here:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you>

Form B2 (new bespoke permit), available here:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke>

Form B3 (new bespoke installation), available here:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b3-new-bespoke-installation>

Form F1 (opra, charges, declarations), available here:

<https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations>

- **Application charge**

Link to charging guidance: <https://www.gov.uk/government/publications/environmental-permitting-charges-guidance/environmental-permitting-charges-guidance>

The application fee would be calculated as follows:

Permit application fee		
Charge	Amount (£)	Line in scheme
Section 5.4 non-hazardous waste installation This is the most appropriate activity description for an anaerobic digestion installation regulated under the Industrial Emissions Directive (IED).	£13,984	1.16.2

There may also be additional costs for the following assessments depending on the proximity of the facility to designated sites and the risks the facility site poses:

Add-on fees		
Charge	Amount (£)	Line in scheme
Habitats assessment	779	1.19.2
Pests management plan	1,241	1.19.4
Emissions management plan	1,241	1.19.5
Odour management plan	1,246	1.19.6
Noise and vibration management plan	1,246	1.19.7
Total application fee (estimate)	19,737	

- **Operator competence**

Link to guidance: <https://www.gov.uk/guidance/legal-operator-and-competence-requirements-environmental-permits>

The application must contain evidence of technical competence.

- **Environmental Management System**

Link to guidance: <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>

The application must contain a summary of the Environmental Management System.

- **Emissions to air**

Link to guidance: <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>

H1 risk assessment

The H1 Environmental Risk Assessment should follow the methodology set out in Environment Agency guidance: <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>

Requirements include:

- Identification of emission points and pollutants released from the proposed facility (all emissions to air from combustion plant – CHP engine, boiler and biogas upgrading plant)
- Effective stack heights should be stated (accounting for buildings if applicable) and emissions rates stated
- Quantification of pollutants (worst case concentrations should be assumed) and emission rates using actual measurements or if not available estimations (justification required)
- Use of background pollutant levels (justification required)
- Calculation of pollutant concentrations and comparison against relevant EQS/EAL
- Emission Limit Values proposed. Or if they are not proposed, justification should be provided.

Air dispersion modelling

Where air dispersion modelling has been submitted, the model input files must be provided with the application.

The applicant must provide emission parameters (in accordance with <https://www.gov.uk/guidance/environmental-permitting-air-dispersion-modelling-reports>).

- **Emissions to controlled water and/or sewer (where applicable)**

This is only applicable to proposals that include new emissions to surface water or sewer. Note that this will not be required for discharges that consist of uncontaminated surface water only.

H1 risk assessment

The applicant should submit a H1 Environmental Risk Assessment. This should identify if there are any hazardous pollutants or sanitary pollutants in the discharge(s) and their impact, including:

- Identification of emission points and pollutants released from the proposed facility
- Data on pollutant concentrations (worst case concentrations should be assumed) and maximum & average discharge flow rates using actual measurements (with a sufficient sample size and to suitable accuracy) or if not available estimations (justification required)
- Data on upstream or background pollutant levels of receiving waters, river flows and the relevant EQS/EALs
- Consideration for any habitats, species or other designations
- Calculation of resulting pollutant concentrations in the receiving water body and comparison against relevant EQS/EALs

Assessment for **hazardous pollutants** should follow the methodology set out in Environment Agency guidance <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>

Requirements include:

- Apply each H1 screening test to determine if the substances screen out as insignificant. Use of the H1 software tool is advised and this should be submitted with the application.
- For discharges to sewer, details of the trade effluent consent (i.e. any limits set, the sewage treatment works name and location of the final discharge point), Sewage Treatment Reduction Factors (STRF) used.

Assessment of **sanitary determinands** should follow the methodology set out in Environment Agency guidance

<https://www.gov.uk/government/publications/h1-annex-d2-assessment-of-sanitary-and-other-pollutants-in-surface-water-discharges>

This may not be necessary for discharges solely of sanitary determinands to sewage treatment works.

Where H1 Risk Assessment requires further assessment, including modelling, the applicant should provide the modelling. Modelling should be in line with Environment Agency guidance: <https://www.gov.uk/government/publications/modelling-surface-water-pollution-risk-assessment>

Note that the Environment Agency may carry out the modelling tests if the screening tests for freshwaters showed that the discharge is a risk to the environment. Applicants must arrange modelling where further assessment is required for discharges to estuaries and coastal waters, lakes and canals

- **Emissions to ground and/or groundwater (where applicable)**

This is only applicable to proposals that include new emissions to ground and/or groundwater.

A risk assessment should be submitted with the application. The assessment should follow the methodology set out in Environment Agency guidance: <https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit>

- **Habitats assessment**

The application should identify all habitat sites (SAC, SPA, RAMSAR, SSSI, MCZ) sites, protected species and non-statutory conservation sites i.e. Local Wildlife Sites, National Parks, Ancient Monuments, AONB etc. Assess the impact of facility on the sites – emissions to air and water, noise and dust impacts etc.

The application must contain the results an assessment of impacts at:

- SAC, SPA and Ramsar within 10 km
- SSSI within 2 km
- Local wildlife site, ancient woodland, national nature reserve and local nature reserve within 2 km

The following impacts need to be included:

- Predicted pollutant concentrations against the critical levels set out in H1 Annex F
- Acid and nitrogen deposition

- **Site condition and baseline report**

Site Condition and Baseline report should be submitted and written in accordance with H5 guidance <https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report>

The site condition report:

- should have a conceptual site model
- identify and list 'relevant' hazardous substances
- include soil, groundwater and/or ground gas data (where applicable)

- **Process flow diagrams**

The application should contain a process flow diagrams.

- **Site drawings (site plan, site layout plan, site drainage plan, design drawings etc.)**

The applicant should submit a detailed site plan. The site plan should have the following features:

- Boundary reasonably accurate and in acceptable format and clearly identified
- Emissions points clearly shown on the plans
- Other geographic features (roads, rivers etc.) identified
- Scale indicator included
- OS NGR indicated

Other features: Site drainage plans (<https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>), site layout plans, plant design drawings should be provided.

- **Management Plans & Risk Assessments**

Link to guidance: <https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>

Risk assessments (minimum of a H1 Annex A) screening for odour/noise/ fugitives/accident management should be provided.

The following stand-alone management plans should be provided with the application (in addition to the risk assessments above).

- A detailed odour management plan. Certain activities automatically require an odour management plan (unless it can be demonstrated that they are low risk). Refer to the following document for list of these activities: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>

Link to odour guidance: <https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>

Remember there is an additional fee associated with odour management plans (see above).

- An Accident Management Plan as follows: <https://www.gov.uk/guidance/develop-a-management-system-environmental-permits>
- A Pest Management Plan. Details of requirements for Applicants can be found here: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>

Remember there is an additional fee associated with this plan.

- A Dust Management Plan (where applicable depending on the proposal). Details of requirements for Applicants can be found here: <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>

Remember there is an additional fee associated with Emission Management Plans and this includes Dust Management Plans (see above).

- Flood risk assessment – If the site is located in a flood risk zone, assessment of risk of pollution in the event of a flooding event should be provided.
- **Noise impact assessment /risk assessment**

Where the proposal has a potential to impact nearby sensitive receptors, a noise impact assessment (NIA) should be provided. This will normally be based on BS 4142. Noise modelling requirements can be found at the following link:

<https://www.gov.uk/government/publications/noise-impact-assessment-information-requirements>

The noise assessment needs to consider all on site noise sources including on-site vehicle movements but not off-site vehicle movements.

Link to noise guidance:

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

<https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-that-do-not-have-set-limits>

Where the risk and impact assessment shows that there is a potential for the facility to have noise impacts on nearby sensitive receptors, a Noise Management Plan (NMP) should be provided.

Remember there is an additional fee associated with Noise and Vibration Management plans.

- **Technical Assessment – The Application Form Guidance Notes contain specific guidance to applicants refer to these where appropriate.**

The application should contain the following technical aspects:

- A description of the abatement techniques for all necessary substances and receptor media
- An assessment of energy usage/efficiency techniques
- Monitoring frequencies, standards and proposals including MCERTS.
- Raw materials inventory and annual throughput
- Raw material usage efficiency techniques
- Raw material storage arrangements
- List all the waste codes proposed for the facility, using the EWC Catalogue. Justification for the use of 99 codes must be provided where appropriate. Note that EWC 19 05 99 (compost leachate) has been replaced by EWC 16 10 02.
- A description of the proposed waste handling (including storage and segregation).
- A review of waste minimisation at the facility.
- A consideration of site infrastructure and detail should be provided (e.g. secondary containment, tank specification, surfacing). The site infrastructure should be compared with the relevant industry /construction standards (e.g. CIRIA guidance etc.).
- A BAT assessment should be provided justifying that BAT has been applied for example, treatment technology, equipment choice, abatement technology, energy efficiency, raw material usage (if BAT conclusions are applicable then in line with the Waste Treatment BAT conclusion published in August 2018). Where needed, a cost benefit analysis of different options, in line with Environment Agency Guidance should be provided: <https://www.gov.uk/guidance/best-available-techniques-environmental-permits>
- If BAT is not proposed, justification must be provided.

Biowaste treatment specific requirements

- **Demonstration of BAT**

A demonstration of BAT measures should be provided. The measures should be in accordance with those specified in:

- BAT Conclusions & BAT Reference document for waste treatment and storage installations (August 2018)
- Environment Agency's draft biowaste treatment technical guidance note – *How to comply with your environmental permit. Additional guidance for: Anaerobic Digestion, Reference LIT 8737, Report version 1.0 (November 2013)*

Any departure from BAT should be fully justified.

- **Bioaerosols Risk Assessment**

A bioaerosols site-specific risk assessment (SSBRA) will be required where:

- The operational area is located within 250 metres of sensitive receptors; or
- Where area or point source emissions may pose a risk to the nearest sensitive receptor's location.

The SSBRA must demonstrate that the process and/or abatement measures adequately prevent or where this is not possible significantly reduce the risk of bioaerosols release and that the resulting activity will be unlikely to expose the nearest sensitive receptor to elevated concentrations of bioaerosols. The detail and level of risk assessment must be site specific, process and location dependant. To control and minimise the risks identified, measures and process controls must be in place and clearly stated.

Remember there is an additional fee associated with the assessment of bioaerosols risk assessment.

Link to sector guidance:

<https://www.gov.uk/government/publications/bioaerosol-monitoring-at-regulated-facilities-use-of-m9-rps-209>

<https://www.gov.uk/government/publications/m9-environmental-monitoring-of-bioaerosols-at-regulated-facilities>

- **List of wastes**

Waste streams which are considered acceptable are specified in the anaerobic digestion standard rules permit templates. Any other waste streams should be accompanied by a robust justification which is in accordance with the Environment Agency Framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment, Framework Guidance Note (2013).