

FUGITIVE EMISSIONS MANAGEMENT PLAN (WESTWOOD)

1. Procedure Objectives

This management plan ensures that fugitive emissions are prevented and managed to ensure no harm is caused to the environment.

2. Scope

This management plan is specific to the controls in place at the Westwood AD plant.

3. Health and Safety considerations

There are no significant Health and Safety considerations with this procedure.

4. Environmental considerations

As detailed in the plan.

5. Responsibility

The AD facility is the responsibility of the CEO, located at Biogen (UK) Ltd's Head Office in Milton Ernest, Bedfordshire.

The facility has a dedicated Site Manager who has overall responsibility for the daily operation of the site.

Routine preventative and reactive breakdown maintenance is the responsibility of the Site Manager. A technical maintenance support team provides assistance but all works on site are authorised by the Site Manager.

Site staff at the AD facility are responsible for maintaining an awareness of general site performance during their daily activities. Staff are instructed to report any fugitive emissions to the Site Manager without delay.

Incidents which result in a fugitive release will be reported to the Site Manager and a non-conformance and action plan completed as per the Problems Complaints and Improvements procedure. The Emergency Preparedness and Response Procedure should be referred to in such instances.

6. Definitions

Bund

A system for preventing waste which has leaked from a primary container from escaping the place it is stored and to the wider environment.

Sealed drainage system

A drainage system with an impermeable surface which ensures that no liquid will run off the surface other than via the system, and all liquids entering the system are collected in a sealed sump.

Volatile Organic Compounds (VOC)

Any compound of carbon, excluding carbon monoxide, carbon dioxide, carbonic acid, metallic carbides or carbonates, and ammonium carbonate, which participates in atmospheric photochemical reactions.

7. Associated Documents

All associated documents referred to in this Procedure are underlined.

Fugitive Emissions Management Plan (Westwood)	Version 7	Issue date: 02/12/2025	Issued by: Kate Lister/Darren Smith
Uncontrolled when printed			PAGE 1 OF 22

Fugitive Emissions Management Plan (Westwood)	Version 7	Issue date: 02/12/2025	Issued by: Kate Lister/Darren Smith
Uncontrolled when printed			PAGE 2 OF 22

8. Fugitive Emissions Management Plan

What do you do that can harm and what could be harmed			Managing the risk	Assessing the risk		
Hazard	Receptor	Pathway	Risk Management	Probability of exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk? What do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? If it occurs who is responsible	How likely is this contact and reasoning behind?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence?
Dust from activities	Localised atmosphere Local amenities	Air Wind	<p>The nature of the waste being delivered to site will not change as part of the permit variation. The incoming feedstocks aren't dusty. The facility will continue to accept predominantly food wastes from domestic, commercial and industrial processes and will remain a wet AD facility.</p> <p>In addition to this, all feedstocks will continue to be delivered to site in sealed units and will be deposited inside the sealed waste reception building equipped with negative air extraction.</p> <p>The fast acting roller shutter doors will be completed closed prior to the discharge of any feedstocks into the waste reception bays. After front end treatment, the processed material is transferred through</p>	<p>Unlikely.</p> <p>The waste feedstocks and raw materials involved in the AD process are not dusty in nature. The additional 45,000 tonnes of waste to be accepted per annum as part of this application will not increase dust emissions. The Westwood AD facility will continue to operate as a wet AD site.</p> <p>The AD process and site operations will be</p>	<p>Localised nuisance</p> <p>Detrimental to amenities</p>	Very low

Fugitive Emissions Management Plan (Westwood)	Version 7	Issue date: 02/12/2025	Issued by: Kate Lister/Darren Smith
Uncontrolled when printed		PAGE 3 OF 22	

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			<p>to an enclosed system comprised of gas tight process tanks.</p> <p>The process is liquid based and therefore any potential dust being released is virtually eliminated.</p> <p>Roadways to the site are concrete or tarmac and are maintained and kept clean to prevent dust arising from vehicle movements. Vehicle wheels are washed with a disinfectant water mix prior to leaving the reception hall and if necessary the access road would be dampened during very dry conditions with the use of a hoses or a mobile bowser. The Site Manager is responsible for ensuring the wheels of vehicles are washed prior to departing site.</p>	<p>enclosed. The process itself is liquid based.</p> <p>Any feedstocks with higher percentage dry matter will be mixed and blended with liquid feedstocks and/or with mains water or captured rainwater with RWBT/Digester recirculated material.</p>		
Mud / Litter	Local Amenity	Air Wind	Mud from the process is considered negligible because the access road is concrete and tarmac and is maintained such that vehicles do not transport mud	Very unlikely.	Public nuisance Harm to wildlife	Very low

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		Vehicles	<p>onto the highway. In addition to this, all vehicles leaving the reception hall have their wheels washed with a disinfectant/water mix to prevent debris being transported onto the highway.</p> <p>Litter from the site is negligible as the waste will be delivered in sealed containers to prevent windblown material.</p> <p>All feedstocks will continue to be discharged into the sealed designated waste reception bays in a purpose designed building served by a negative air extraction system. The fast acting roller shutter doors are closed prior to any waste being tipped and unloaded. The doors remain closed until vehicles have completely discharged and subject to wheel washing and are ready to depart.</p> <p>Daily checks will be undertaken for litter and where necessary litter picking will be</p>			

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			<p>undertaken in accordance with the <u>Daily Checks Procedure</u>.</p> <p>As part of the proposed variation, the Borger separator for digestate screening is currently positioned outside, this will now be enclosed in a sealed purpose designed building served by negative air extraction. Any remaining contaminates screened and removed down to <2mm will be collected in a sealed container which will also be positioned within the building and covered prior to removal.</p>			
Methane / Gas release	Air quality Local amenities Public / employee health	Atmosphere Wind	The site has been designed with three CHP engines and gas to grid infrastructure to produce, capture and utilise biogas in the most efficient manner. Either surplus CHP engine capacity or increased injection capacity to the national grid will be available. In the event of surplus gas production, the rate of feeding to the Digesters would be minimised to reduce gas generation and/or mixing would stop,	It is very unlikely that a large release to atmosphere will occur due to the control measures in place.	Detrimental to health Public nuisance	Low

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			<p>and the auxiliary flares would auto ignite at a pre-determined gas holder volume or pressure and are designed to achieve complete combustion. Surplus gas within CHP common gas line would be returned to Digesters 1 and 2. Excess or so called reject gas within the gas to grid operations would be returned to Digesters 3, 4 and 5.</p> <p>The external process tanks are gas tight and therefore under normal operating conditions there will be no releases to atmosphere. The pipework and tanks are fitted with over pressure valves; these would only activate during emergency. All five Digesters, the RWBT, and the Pasteuriser Tanks will be equipped with Pressure Relief Valves (PRV) set to release at a pre-determined gas pressure and monitored on SCADA.</p> <p>The CHP units are subject to routine servicing to maintain combustion efficiency. Records of all monitoring undertaken and</p>			

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			<p>for maintenance carried out are stored and available on request. Biogen operates a very intensive maintenance regime to ensure the optimal performance of all their CHP engines. This is contracted to a specialist third party, Clarkes Energy. This includes, but not limited to, a 60,000 hour operating service which involves the engine being removed from site for a full service and recommissioning. This ensures the CHP engines are maintained to the highest standard.</p> <p>The engines are fitted with a 'Leanox System', which evaluates the gas quality and adjusts itself to ensure the most efficient burn of the gas and eliminating any methane slippage that could occur. By having this advanced technology on the CHP engines and also by maintaining it to such a high level, Biogen believe they are</p>			

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			<p>operating to the current highest level of BAT.</p> <p>Daily visual checks will be undertaken to check and assess for any leaks in accordance with the <u>Daily Checks Procedure</u>.</p> <p>The site will continue to be subject to six monthly gas camera surveys to perform a full camera survey of the sites gas system according to the documented <u>Leak Detection and Repair procedure</u>.</p> <p>The company has purchased a Opgal Eyecsite gas leak detection camera and quantification software. Members of the Biogen compliance team are trained to use the camera to assist with the LDAR programme across the business. Where a methane leak is detected, corrective actions are put in place. By having our own gas detection camera, we are in a position to not only fulfil the six monthly LDAR</p>			

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			<p>requirement, but to also address any potential concerns around methane slippage which can be investigated and resolved. Biogen has an appointed Technical Compliance Manager who oversees the LDAR schedule and monitoring schedule.</p> <p>Gas camera surveys include, but not limited to, checks on all PRV's, pipework, tank inspection hatches, gas holders, roof covers, pipe stub-ins and tank sides, all connecting gas lines including gas blowers and skids, flare stack areas, the CHP area and gas to grid area including gas inlet lines, entry points, BUP, and GEU.</p> <p>Biogen adopt a proactive approach to potential odour releases and subsequent complaints, and as such have undertaken a full review of the foreseeable situations which might compromise the sites' ability to prevent and or minimise odour from operations. This includes documented</p>			

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			<p>procedures and control measures in place through engineering, including both software control and hardwired controls as part of our <u>HAZOP</u> process. Gas levels, pressures and quality are constantly monitored on SCADA.</p> <p>The site will be manned by appropriately qualified and trained staff including senior engineers. The site operate a duty rota with a designated Duty Manager on call at all times.</p>			
Contaminated runoff from waste acceptance	Surface water drainage Watercourses Groundwater	Land drains Soil Surface water drains	<p>All incoming waste will be unloaded / discharged in the purpose built reception building which acts as a sealed system. Any spillage during unloading or processing will enter the drainage gulleys and/or below ground 200m³ sump and will be put through the treatment process. The floor of the building is engineered to drain away from the doors and towards the below ground sump.</p>	Very unlikely.	Pollution of surface waters Groundwater pollution Soil contamination	Low

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			<p>All drains within the building are contained within a sealed system so any leaks/spills from the pump room would also drain into the below ground sump in the reception building.</p> <p>A site drainage plan is available including any sub-surface pipes and sumps (Document reference WWSWDP1).</p> <p>The below ground waste reception hall sump is a purpose built storage. The sump is a tank constructed of glass-fused-to-steel. The tank sits within a concrete structure which acts as a secondary barrier to the escape of material in the event of a leak. Should the integrity of the below ground sump ever be questioned, the sump would be drained and subject to testing.</p>			
Runoff / spillage from process tanks	Surface water drainage systems	Land drains	The new external purpose built process tanks including a RWBT, five Digesters, and two Pasteurisers as well as associated	Very unlikely as contained within a	Pollution of surface waters	Low

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& digestate storage	Watercourses Groundwater Soil	Soil Surface water drains	<p>pipework will be sealed and positioned on an impermeable reinforced concrete base slab surrounded by an impermeable concrete bund and therefore any spills/leaks would be contained. In the event of a spill/leak the area would be jet washed and any associated contaminated washdown water/rainwater would be directed into a below ground sealed sump and manually pumped to the front and put through the treatment process or directly pumped to the RWBT.</p> <p>All storage and process tanks will be rebuilt to have a minimum 30-year design lifespan in accordance with BS ISO 15686 Part 1 and incorporate the relevant international standards. The tanks will be constructed of glass fused steel and comply with BS5502 parts 50 and 22. The tanks and pipework will be pressure tested to ensure integrity. Tanks and pipework will be fitted with</p>	<p>secondary containment area.</p> <p>Management procedures being adhered to will ensure integrity of containment and ensure appropriate checks are undertaken prior to release of surface waters.</p> <p>All water discharged to pond and therefore in unlikely event of accidental release lagoon could be bunged to prevent any discharge as per <u>Emergency Preparedness and Response Procedure.</u></p>	<p>Groundwater pollution</p> <p>Soil contamination</p>	

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			<p>pressure alarms, flow meters and Pressure Relief Valves (PRVs).</p> <p>All-purpose built tanks will be designed and constructed to prevent leakage or overfilling.</p> <p>All process tanks are to be fitted with two high level detection probes continuously monitored and connected to SCADA. In addition to this they are hard-wired to automated valves and feed pumps to shut down all feeding into the tanks when activated. The high level tank detection probes are subject to monthly testing. In addition, all tank levels will be visually checked daily (where possible) and the findings recorded on a <u>daily checklist</u>.</p> <p>Multiple flood probes are to be positioned throughout the site including within the storage and process tank area. Flood probes will be monitored on SCADA and will be subject to monthly recorded checks.</p>			

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			<p style="color: red;">Flood probes are hardwired to the feed pumps to stop feeding into the tanks following activation.</p> <p>All tanks are maintained in accordance with the manufacturers recommendations and subject to daily visual checks. Recorded integrity checks are undertaken for all tanks at the point of installation or following a degrid by a qualified third party.</p> <p>The concrete bund for the process tanks is also positioned within a clay base and surrounded by a clay lined earth bund with a capacity of 25% of the total storage containment. The digestate storage tanks are also situated within this impermeable earth bund.</p> <p>C736 guidance recommends that the secondary containment volume is the larger of 25% of the bund capacity or 110% of the largest tank. 25% of the proposed total primary containment capacity is</p>			

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			<p>43,500m³ = 10,875m³, 110% of the largest tank (digestate storage tank) is 9,700m³ = 10,670m³. At Westwood 25% of the total inventory dominates and the required secondary containment capacity is 10,875m³.</p> <p>The total secondary containment capacity provided by the existing bund of 14,008m³ exceeds the required figure of 10,875m³, and therefore the secondary containment bund has adequate volume.</p> <p>Boreholes drilled identified that the containment bunds are formed from Clay identified predominantly as the Oadby member – Diamicton. Samples were extracted from this material for laboratory permeability testing, which gave results for Coefficients of Permeability of 5.3 x 10⁻¹¹ m/s and 1.2 x 10⁻¹⁰ m/s. These permeability values are significantly lower than the required threshold of 1 x 10⁻⁹ m/s contained within C736 and other similar guidance.</p>			

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			<p>Previous site investigation works completed during site construction in 2009 (Rolton Group, 12th February 2009) also proved that the in situ soils were an 'impermeable' clay with measured permeability lower than C736 requirements.</p> <p>SLR have completed a C736 risk assessment for the Westwood site using the Anaerobic Digestion and Bioresources Association (ADBA) methodology. The risk assessment indicates that the site is considered to be 'low' risk, and therefore requires class 1 design.</p> <p>Unlined earth bunds are an allowable design for class 1 sites, with C736 specifying a minimum thickness of 1m of Clay with an impermeability lower than 1×10^{-09} m/s. The bund at Westwood exceeds these minimum criteria, with a greater thickness of material with significantly lower permeability. It is noted that there is a</p>			

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			<p>localised low spot to the northwest corner of the earth bund. This is to be remediated by clearing the area of topsoil and vegetation, exposing the underlying Clay bund and compacting suitable impermeable Clay under Engineering supervision. This will be brought up to match the level of the adjacent concrete bund wall (98.410mAOD). Assuming the low spot is remediated, the available containment volume for the bund is modelled as 14,008m³ which exceeds the required volume of 10,875m³.</p> <p>In the unlikely event of a spillage from the tanks the <u>Emergency Preparedness and Response Procedure</u> would be actioned with immediate effect. All site staff receive training in emergency preparedness and response. Spill kits are available throughout the site and are periodically checked and stocked. In the unlikely event of significant spillage, incoming feedstocks would be diverted to Biogen's other AD</p>			

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			<p>sites. The Environment Agency would be notified as soon as possible.</p> <p>Daily checks will be undertaken around the site to inspect for any signs of leaks/spills, only once the site manager is satisfied that there is no risk of contamination within the sump, then the sump water can potentially be discharged (this is a manual activity) in accordance with the <u>Sump Inspection and Release Procedure (Westwood)</u>. If the sump water is contaminated or spills/leaks noted within the bunded area, the contaminated water will be directed back into the process for treatment.</p> <p>Only clean uncontaminated water will be discharged to the onsite attenuation pond subject to testing. The pond is served by a sluice which is manually controlled to allow water to pass through to the drainage ditch and reedbed system. The Site Manager is</p>			

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			responsible for ensuring compliance with the above procedures.			
Oil Storage	Watercourses Groundwater Soils	Land drains Soil Surface water drains	<p>Minimal quantities of oil will be stored on site at any one time.</p> <p>Fuel for the front end mobile plant will be stored within a purpose built integrally bunded tank (110% capacity) which will remain locked when not in use. This tank is to be stored on impermeable concrete surfacing served by sealed drainage and covered by 24/7 remotely accessible CCTV. A drip tray will be in place during fuelling to catch any spillages.</p> <p>Waste oil will also be stored in an integrally bunded tank (110% capacity).</p> <p>The integrity of the tanks will be inspected daily.</p>	<p>Unlikely, purpose built containers, minimal quantities on site at any one time and locked when not in use so only accessed under full supervision by site staff.</p> <p>Spillage response kits available in accordance with the <u>Emergency Preparedness Response Procedure</u>.</p>	<p>Pollution of surface waters</p> <p>Pollution of groundwater</p> <p>Soil contamination</p>	Low

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			<p>The Site Manager is responsible for ensuring the oil is stored within appropriate secondary containment on site.</p> <p>In the unlikely event any fuels entered the sealed drainage system. All fuel / material would be removed by tanker and sent for appropriate recovery or disposal elsewhere in accordance with duty of care and hazardous waste obligations by a registered waste carrier. Any contaminated feedstocks would be removed for appropriate disposal elsewhere. The sealed drainage system would be flushed through and cleaned prior to a thorough inspection before being put back into use. Odour from any spillage which may occur inside the building should not be detectable outside. The building is served by a negative air extraction system achieving at least three air changes per hour. All extracted air is to be channelled through to a purpose designed carbon filtration</p>			



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			system for treatment prior to emission to air via a stack.			