

Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

The Company Secretary

Tudor Griffiths Limited
Wood Lane
Shrewsbury Road
Ellesmere
Shropshire
SY12 0HY

Application number: EPR/CP3698VW/V004

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 12 November 2020.

Send the information to either the email or postal address below by 29/01/2021. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused.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: john.mcclean@environment-agency.gov.uk.

Name	Date
John McClean	09/12/2020

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.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Fire Prevention Plan

You must consider the 'Fire Prevention Plans: environmental permits' guidance (updated 09/01/2020) (<https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits>), hereafter referred to as the guidance, and come to your own view as to what proposals you consider will meet the objectives to:

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

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

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

Schedule

Fire Prevention Plan (FPP).

1. (a) Provide details on how gas cylinders, aerosols, combustible liquids and chemicals are used and stored on site.
(b) Provide a revised site plan which shows the locations of gas cylinders, aerosols, combustible liquids and chemicals.

Although Section 3 of our FPP guidance states it does not apply directly to non-waste materials such as cylinders, aerosols and combustible liquids, it also notes that these must be taken into account in the FPP because they can cause or increase the impact of a fire on site. The current FPP has insufficient consideration of these materials.

2. Provide details of the content and frequency of the regular exercises held on site to test how well the fire prevention plan operates and to ensure that staff understand all its requirements.

Section 5 of our guidance states that “you must have regular exercises to test how well your plan works and make sure that staff understand what to do. Set out in your plan how often you’ll carry out these exercises”. Your Training Needs Assessment indicates all staff received training on the fire procedure. You must provide detail on the content and frequency of the fire exercises that are required by Section 5 of the guidance. Please note that this requirement for regular exercises is not realised by use of fire drills or fire alarm tests.

3. Provide details on the content of a documented maintenance and inspection programme for static and mobile plant and equipment (such as - how records are kept and what actions are taken in the event of problems being discovered). Your response must demonstrate that your maintenance and inspection procedures will minimise the risk of fire from this site equipment.

Section 7.2 of our guidance states that “you must have a maintenance and inspection programme for static and mobile plant and equipment”. Your FPP references the control of risks of loss of containment from fueling of static and mobile plant but does not address their maintenance and inspection. Please note that as the FPP must be a stand-alone document, references to maintenance and inspection programmes that may be present in other documents does not meet the requirements outlined in section 7.2 of our guidance.

4. (a) Confirm that electricians on site are fully certified by a qualified electrician or provide details of how any alternative system operated on site achieves the same level of electrical protection.
(b) Submit a copy of the written procedures in place that set out how regular maintenance of electrical systems and equipment is carried out.

Section 7.3 of our guidance states “Electricians on site must be fully certified by a qualified electrician and you must have written procedures in place that set out the regular maintenance.” Section 1.0 of your plan states that “Electrical testing on site is carried out either, by the manufacturer if a repair is carried out under warranty/ R&M contract or by T&G Electrical qualified electrician.... All fixed and hard wire electrical circuits, including the biomass building, are tested in accordance with the Electricity at Work Regulations 1989. This work is currently undertaken by TG Electrical.”

You must provide the written procedures that define how this work is undertaken and how it is ensured a qualified electrician carries it out.

5. (a) Provide a description of the safe working practices, such as a permit to work system, for hot works (such as welding and cutting).

Section 7.5 of our guidance states “You must ensure staff and contractors follow safe working practices, such as a permit to work system, when carrying out hot works such as welding and cutting. You should carry out a fire watch for a suitable period after hot works have ended, particularly at the end of a working day.” Your plan does not reference the permit to work system or demonstrate how such safe working practices operate on site to minimise fire risks.

(b) Demonstrate that a system of cleaning and washing of equipment at the end of a day is satisfactory in replacing a fire watch in delivering equivalent protection against fire particularly for equipment previously subject to hot works.

(c) Demonstrate that persons carrying out cleaning and washing of equipment at the end of a day are trained to be aware of and detect possible signs of fire that would be detected during a formal fire watch.

(d) Include any check list that they must complete to demonstrate this cleaning and washing has been completed and that no risks of fire remain.

Your plan does note that instead of a fire watch at the end of the working day, mobile plant and equipment is cleaned and washed at the end of the day. It is claimed that, because this removes the linkages in the fuel and source of ignition from the fire triangle, it is not deemed necessary to carry out a formal fire watch at the end of the day. It is not evident in your plan that all equipment that has been subject to hot works would be cleaned or washed at the end of the day (it might remain too hot to clean) and therefore it is not apparent that the alternative system of cleaning/washing equipment satisfactorily replaces a formal fire watch at the end of the day following hot work.

6. (a) Demonstrate how the FPP addresses fully the risk of fire in the biomass drying building and burner housing.

(b) In relation to the operation of the biomass plant:

(i) How much waste is stored within the biomass building?

(ii) What distance is between stored wood in the biomass building and sources of heat such as the burners and drying floors?

(iii) How long does wood remain within the biomass plant during drying?

(iv) What temperature monitoring is carried out on wood within the biomass building?

(v) What trigger levels are used to indicate an unacceptable rise in temperature of wood within the biomass building?

(vi) What actions are taken should wood exceed trigger temperatures?

There is limited information provided in your FPP of the management and control of fire risks within the biomass drying building and the boiler housing area. As these operations are the subject of the current permit variation application, you must demonstrate that their operation and their fire risks have been fully considered within your revised and consolidated FPP.

7. (a) Provide justification for the location of the designated smoking area behind the MRF building. How do you prevent the smoking area from being an ignition source?

(b) Confirm how frequently this area is checked or cleaned and against what requirements.

(c) Demonstrate that this area can be accessed quickly should a fire start there?

Section 7.4 of our guidance states, “you must apply a no smoking policy or have designated smoking areas a safe distance from combustible wastes to prevent accidental ignition.” Section 1.0 (Discarded smoking materials) of your application notes that the two smoking areas are outside the canteen and near the garage. You must demonstrate how these areas have been selected to ensure they are “a safe distance from combustible wastes” and how they are checked, cleaned and maintained to ensure no build-up of fire risks in these areas.

8. (a) Provide detail on how fire watch inspection checks are recorded including:
- What does the fire watch inspection check consist of? Provide the procedure/summary of the procedure.
 - What is the frequency of fire watch inspections?
 - What staff role is responsible for this process?

(b) Describe how non-conformances and actions raised in fire watch inspections are reported. *Section 1.0 (Hot exhausts) of your FPP notes that “visual observations take place throughout the day by staff operating the equipment, staff from the MRF passing, customer vehicles entering and leaving the MRF, CCTV”. This is not a formal procedure for fire watches as it relies on persons passing and customers entering and leaving your site raising alarm. Your formal system of fire watches must not rely on actions and persons over which you have no official control.*

9. (a) Describe how mobile industrial heaters would be used on site to ensure their operation does not increase the risk of fire.

Section 7.6 of our guidance states “you must have written procedures that set out the use and regular maintenance of industrial heaters.” Section 1.0 (Industrial heaters) of your FPP states that “There are no mobile industrial heaters used as a matter of routine on site.” This statement does not rule out the use of these heaters but simply states they are not routinely used. You must demonstrate that you have a procedure or system of control for industrial heaters in place for the event they are used on site.

(b) Demonstrate how the biomass drying building used to dry waste wood is managed to ensure that its operation does not increase the risk of fire on site.

Section 1.0 (Industrial heaters) of your FPP also states that “the only ‘industrial heating’ is from the purposefully built drying bays, within the biomass building. There is little evidence that the biomass drying building used for drying waste woods has been included within the scope of the fire prevention plan and insufficient information on the management of that plant to reduce its fire risk.

10. (a) Demonstrate how fuels and combustible liquids are prevented from leaking from site plant and equipment.
- (b) Provide a copy of the procedure for clearance of spillages and losses of containment on site.

Section 7.10 of our guidance states “You must prevent fuels and combustible liquids leaking or trailing from site vehicles and ELVs.” Although there is some discussion in the application Risk Assessment on oil/fuel spillage from road vehicles and plant on site, this is not referenced in your FPP. As the FPP is a stand-alone document there must be systems detailed within it to prevent fuels/oils leaking from site plant and vehicles.

11. Confirm how regularly the site is inspected and cleaned to prevent the build-up of loose combustible waste, dust and fluff, particularly in the MRF and biomass drying buildings.

Section 7.11 of our guidance states “Your plan must state how regularly you’ll inspect and clean the site to prevent the build-up of loose combustible waste, dust and fluff.” There is no reference in your FPP to inspection and cleaning to prevent the build-up of these combustible materials.

12. (a) Submit a copy of the written procedures for waste acceptance checks on site to prevent incoming hot loads being mixed with wastes stored on site.

- (b) Provide a description of your procedures for quarantining and rejecting wastes which could have elevated temperatures or contain key ignition sources.
- (c) Provide a description of how you would identify how a delivery of waste could contain wastes with elevated temperatures.

Section 7.12 of our guidance states “You must have written procedures for waste acceptance checks to prevent reactions between incompatible or unstable wastes, including lithium batteries. You must use a quarantine area where necessary”. Section 7.13 states “You must have a quarantine area for hot loads”.

There is no reference in your FPP to the prevention of hot loads being accepted on site. There is reference in your FPP to the use of the quarantine area but no reference to the quarantine or waste rejection procedures that might necessitate wastes being sent to the quarantine area.

Sometimes a whole load might not be hot but a small hot spot could be present. The importance of finding this information will depend on how long you propose to store waste for. i.e., hot spots are less risky if wastes are stored for small periods of time and in smaller piles. These waste acceptance, quarantine and waste rejection procedures may be located within other elements of your environmental management system, but as the FPP must be a standalone document, they must be included within it if they are used to comply with requirements of our FPP guidance.

- 13. (a) Describe how the procedures on site ensure a good stock rotation for all stored materials.
- (b) Demonstrate how the procedures on site ensure the “first in, first out” principle is followed.

The fire prevention plan must show that you have a clear method to record and manage the storage of all wastes on site. You must show how you will follow the ‘first in, first out’ principle.

Section 8.1 of our guidance states “You must use good stock rotation for all stored materials” and Section 11.2 states “your fire prevention plan must show how you’ll carry out full and frequent stock rotation, ensuring you have a first in, first out policy”.

Neither stock rotation nor compliance with the “first in, first out” philosophy are adequately addressed in your FPP.

- 14. (a) Demonstrate how waste handling and storage ensures that external heating during hot weather is not a potential source of fire.
- (b) If required, confirm that waste will be shaded from direct sunlight.
- (c) If required, confirm any other techniques that will be used on site to enable heat generated within a waste pile to be released.

Section 8.2 of our guidance states that you must “take into account external heating during hot weather and consider shading waste from direct sunlight or using other techniques to enable heat generated within the pile to be released”. Further detail on how you intend to manage your waste piles to address external heating during hot weather is required in your FPP.

- 15. Provide a description which demonstrates that fire walls and bays are designed and constructed to meet ALL the requirements of Section 11.2 of our guidance including that:
 - a. They resist fire (both radiative heat and flaming);
 - b. They have a fire resistance period of at least 120 minutes to allow waste to be isolated;
 - c. Joints will be adequately sealed;
 - d. The calculation of flame height and radiation is considered in preventing the spread of fire between piles;
 - e. Representative checks are taken on the temperatures of all wastes within a bay;

- f. Wastes can be quickly and effectively removed from bays and isolated during an incident;
- g. Brands or lighted materials can be prevented from moving outside of bays and potentially igniting other materials.

Submit the specification of the fire walls proposed to demonstrate that construction of the walls offer a thermal barrier.

Section 11.2 of our guidance notes that your FPP must demonstrate that fire walls and bays meet a number of key criteria if they are used on site to reduce separation distances between wastes. Section 3.0 (Prevent fire spreading) of your FPP confirms that waste is stored in bays constructed from concrete panels. Other than defining the maximum internal dimensions of each bay, there is no indication that the bays meet the requirements highlighted in Section 11.2 of our guidance.

16. (a) Confirm that, for the automated fire detection system within the MRF building (heat sensors linked to an off-site alarm company), its design, installation and maintenance are covered by an appropriate UKAS-accredited third party certification scheme.
- (b) Demonstrate that automated fire detection systems are in place within the biomass building and all other buildings within the permitted area where there is a risk of fire and confirm their design, installation and maintenance are covered by an appropriate UKAS-accredited third party certification scheme.
- (c) If buildings where there is a risk of fire (such as the biomass building) have not automated fire detection systems installed, provide details of the alternative fire detection methods that are provided for each building and demonstrate why these chosen methods are effective for fire detection considering feasibility, out of hours operations, responsibilities and times taken to respond.

Section 13 of our guidance states that “You must have procedures in place to detect a fire in its early stages so you can reduce its impact” and that, where automated systems are used, their design, installation and maintenance of automated detection systems must be covered by an appropriate UKAS-accredited third party certification scheme.

Section 5.0 (Detecting fires) of your FPP notes there are heat sensors inside the MRF building linked to an off-site alarm company which are tested weekly. You must demonstrate that the design, installation and maintenance of all automated fire detection systems meet the requirement for third party certification.

There is no reference within your FPP that there are automated fire detection systems within the biomass building or, in their absence, there are effective alternative measures for fire detection.

The revised FPP submitted with Application, EPR/CP3698VW/V004, is a consolidated FPP across the entire permitted site including MRF, waste transfer station and biomass plant. You must ensure it adequately addresses the detection of fire in all areas within the permitted boundary.

17. (a) Demonstrate how fire within all buildings within the permitted area in which waste is stored (including MRF and biomass buildings) would be suppressed in order to meet the requirement in our guidance to extinguish a fire within four hours.
- (b) Confirm in which permitted areas there is the dust suppression system that could be used in an event of fire emergency;
- i. Demonstrate how the dust suppression system could be operated to suppress fire;
 - ii. Provide a risk assessment that demonstrates the dust suppression system used for fire emergency would be adequate and proportionate to suppress fires.

(c) Demonstrate, in the absence of automated systems, how the fire suppression systems to be implemented across the permitted area are proportionate to the nature and scale of waste management activities you carry out and their associated risks.

Section 14 of our guidance states that, in relation to suppression of fires, if you store waste in a building you must install a fire suppression system which must be able to extinguish a fire within four hours. It further notes that the design, installation and maintenance of automated detection systems must be covered by an appropriate UKAS-accredited third party certification scheme.

Section 6 (Suppressing fires) of your FPP confirms there is no formal fixed fire suppression system in place although there is a dust suppression system which could be used in an emergency. The location(s) of this dust suppression system are not confirmed (which buildings) and neither is there any evidence provided on how this dust suppression system would be used to suppress fires nor whether its design is adequate for this purpose.

There is insufficient information given in the FPP on how fire within the biomass building would be suppressed and the operation of any fire suppression system within the biomass plant despite the high risk of fire within that building.

18. (a) Confirm the capacity and construction of the surface water catchment tank (interceptor), settlement pit and surface water lagoon that are designated for containment of fire water run-off.
- (b) Explain how the potential locations to collect and manage fire water on site have sufficient capacity to contain all fire water that might be generated.
- (c) Confirm how fire water generated from fighting a fire in the biomass building would be contained and managed on site.
- (d) Demonstrate how you ensure potentially contaminated fire water entering the surface water lagoon on site is managed to prevent its discharge from site.

Section 9.0 (Managing firewater) of your FPP notes that “early intervention would minimise the generation of fire waters”. It also states that surface water from the MRF is channelled to an oil interceptor prior to a settlement pit before being pumped to the surface water lagoon. There is insufficient information on the construction, capacities and operation of these facilities to confirm they would be appropriate for the quantities of fire water that might be generated from a fire on site.

This Section of the FPP appears to be specific to the MRF operation. Further information is required on the management of fire water generated from a fire within the biomass plant. The surface water catchment tank (interceptor) can be manually opened to allow surface water to enter surface water lagoon on site. If this was to occur and fire water entered the surface water lagoon, it would pollute the lagoon and require the removal of a potentially very large volume of liquid. If road tankers were to be used to remove this liquid, the expense would be significant. You must demonstrate how fire water run-off can be contained on site or demonstrate how it can be realistically removed from site.

Best Available Techniques (BAT).

19. Demonstrate that wood fuel (Grade A wood and virgin wood) are stored under cover to keep them dry and maximise the efficiency of the boiler process.

Section 4.2.1 of Guidance document, "Environmental Permitting Technical Note 5/1(18), Reference document for the incineration/combustion of waste wood" [5/1(18)] states that “uncovered storage of fuels should be avoided to keep fuel dry”. Site drawing, TGE/09/A, Schematic Site Layout – Biomass, does not indicate that the stockpiles of wood are covered.

20. (a) Describe how the combustion zone temperatures of the boilers are raised at start-up from cold.
(b) Confirm that waste wood is not burned during start-up from cold.
(c) Demonstrate how the boiler is operated to prevent idling.

Section 4.2.3 of 5/1(18) notes that an ancillary boiler, fired by gas, oil or virgin wood (never waste wood) is BAT for raising the combustion zone temperature at start-up. There is no reference in the application detailing how the operator intends to start-up from cold. Section 4.2.3 also states that the boiler should be prevented from idling to reduce carbon monoxide concentrations and operators should justify if this is not possible. Table 2 in Application document, 3016/R/002/05, states only that "idling of plant will be minimised".

21. (a) Describe how air flow in the boilers is controlled to maximise thermal efficiency.
(b) Confirm if more air than the theoretical minimum for complete combustion is supplied.

Section 4.2.4 and 4.2.5 of 5/1(18) note the parameters whose control is required for good combustion and outline how control of air flow is essential for thermal efficiency. Table 2 in Application document, 3016/R/002/05, states "Good combustion techniques will be used, including addition of majority of feedstock at optimum temperature, control of oxygen at optimum levels, and continuous charging of feedstock at an appropriate rate". Further information is required on these "good combustion techniques" to ensure they comply with all the requirements in Sections 4.2.4 and 4.2.5.

22. Demonstrate how the "turndown ratio" (the ratio between the maximum and minimum firing rates over which emission parameters can be satisfied) has been optimised to enable greater thermal efficiency.

Section 4.2.6 of 5/1(18) notes that "A good turndown ratio will enable greater thermal efficiency by better matching the heat requirement with the waste wood feed rate." There is no evidence in the application that this has been considered for the biomass plant.

23. (a) Demonstrate that the use of a multi-cyclone abatement system is BAT for the removal of particulate matter (PM_{10} , PM_5 and $PM_{2.5}$) from the discharges from the biomass plant stack.

Section 4.4.1 of 5/1(18) notes the dust emission rates expected for a range of abatement techniques. The technique chosen by the operator, multi-cyclones, has an expected performance of $<60\text{mg}/\text{m}^3$ (expected emission limit value for particulate matter in the application is $34\text{mg}/\text{m}^3$). Section 3.2.3 of application document, 3016/R/002/05 states these systems will capture PM_{10} and PM_5 . However earlier in this section, it is stated that "Particulate matter (PM_{10} and $PM_{2.5}$) are produced by poor combustion of feedstock, resulting in ash or soot that may be released as a point source from the plant's stacks." There is no demonstration that the selected abatement technique removes $PM_{2.5}$. A number of other techniques highlighted such as fabric filters and ceramic filters would be expected to achieve particulate discharge concentrations of $<10\text{mg}/\text{m}^3$. You must demonstrate why it is BAT to operate your plant with multi-cyclones rather than one of the more efficient abatement systems.

(b) Explain how a visual and audible alarm triggered where failure of abatement equipment is detected is adequate to ensure prompt action can be taken to prevent the biomass plant operating without adequate abatement.

- (i) Confirm the location of the visual and audible alarms.
(ii) Specify the actions to be taken and by whom on discovery of the alarm including the timescale expected to bring the plant back into control.

(iii) Demonstrate that these actions and that timescale deliver an equivalent level of environmental control to automatic shutdown of biomass boilers on detection of abatement failure.

Section 3.2.3 of application document, 3016/R/002/05 states “The plant is fitted with a filter leak monitor to assess the performance of abatement equipment...Where a failure of abatement equipment is detected, a visual and audible alarm will be triggered.” Further details on this system are required to demonstrate that it is robust enough to ensure the biomass plant cannot continue to operate with failed abatement equipment.

24. (a) Confirm that sampling points to be used for manual extractive testing are constructed and located in accordance with the Environment Agency’s Technical Guidance Note (Monitoring) M1: Sampling requirements for stack monitoring or appropriate regulator’s guidance (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/635269/LIT_4736.pdf).

(b) Specify the method to be used for monitoring of Volatile Organic Compounds (VOCs) from the biomass plant stacks.

(c) Confirm that the methods, equipment and personnel used for sampling and testing emissions will be accredited to the Environment Agency’s MCERTS scheme.

All emissions testing locations, methods, equipment and personnel must be accredited to an Environment Agency approved scheme. You must demonstrate in your application that your emissions testing procedures meet this requirement.

The methods proposed in application document, 3016/R/002/05, (Section 3.2) meet the requirements of guidance 5/1(18) for particulate matter, carbon monoxide and oxides of nitrogen. There is no definitive method proposed for VOCs other than stating in section 3.2.9 that “Manual extractive testing is carried out on an annual basis and will be carried out using the same method and sampling schedule as for particulate matter and carbon monoxide.” Approved methods are included in Table 5.1 of guidance 5/1(18) but you should check that these remain current by reviewing the attached document (<https://www.gov.uk/government/publications/monitoring-stack-emissions-techniques-and-standards-for-periodic-monitoring>).

Note that the emission limit value for carbon monoxide is likely to be 225mg/m³ (as outlined in Table 5.5 of guidance 5/1(18)) rather than 375mg/m³ proposed in section 3.2.6 of application document, 3016/R/002/05.

25. (a) Confirm that the biomass plant and its operations are subject to a preventative maintenance and cleaning process.

(b) Describe the procedures you will employ as part of your preventative maintenance and cleaning process.

(c) Confirm if the Environmental Risk Assessment/Accident Management Plan (provided as Appendix 10 to the Tudor Griffiths Environmental Management System) applies in full to the biomass plant. If not, submit a similar document specific to the biomass plant.

The Tudor Griffiths Environmental Management System Risk Assessment (Appendix 10 to the Environmental Management System) notes that “routine preventative maintenance and cleaning is carried out. However, this document is titled “MRF” [Material Recovery Facility]. It is not apparent that the content of that document and the comments on cleaning and maintenance pertain also to the biomass plant. You must confirm that all the content of that Risk Assessment is applicable to the biomass plant or submit a separate Environmental Risk assessment for the biomass plant.

Location of Biomass Building.

Methane Mitigation.

26. (a) Describe what mitigation measures have been taken to ensure there is no risk of explosion in the biomass plant building from methane build-up from the landfill cell most adjacent to the new biomass plant building.
(b) Confirm and submit evidence that the biomass plant building has been constructed in a way that prevents methane build up underneath its foundations or migration into the building.
(c) Confirm if methane alarms are present in, or in the vicinity of, the biomass building and justify their absence if they are not present.
(d) Confirm if additional methane monitoring from the landfill cells closest to the biomass plant is proposed and justify the existing level of monitoring if no additional monitoring is proposed.

The building which houses the biomass plant and wood drying has been constructed on an area of land adjacent to the landfill at Wood Lane. The closest cell / phase of the landfill is the oldest one with unknown (little or no) engineering. Elevated methane levels have recently been monitored in perimeter gas boreholes close to the biomass building. The gas engine compound and flare is also located very close to the biomass building.

You must provide evidence that the mitigation of methane from landfill cells has been addressed in the design and construction of the biomass building and the operations of the biomass plant.

The risk of explosion from methane being released from landfill operations into an enclosed area with an ignition source must be assessed and mitigated.

Proximity of Biomass Building to Flare.

27. Demonstrate that the location of the biomass building in relation to the flare was assessed before construction and that it will not change the air dispersion from the on-site flare.

The biomass building has been constructed in close proximity to the flare. The application does not satisfactorily indicate if the risk of changing the air dispersion from the flare due to the proximity of the building has been assessed. This may have been carried out and submitted as part of the process for obtaining planning permission. As there may be potential environmental risks due to changes to air dispersion, you must address this matter also in the environmental permitting process.

Waste Generation.

28. (a) Define the expected quantity of ash waste to arise during the burning of wood;
(b) Outline how the burning of wood will be optimised to minimise the generation of waste ash.

Section 2.3.1 of application document, 3016/R/002/05, states "A small volume of wood ash is also produced as a by-product of the burning process". Although the storage, handling and disposal of this waste is discussed to minimise dust, there is no evidence that the operation will actively seek to reduce this new waste stream.

Dust and Emissions Management.

29. Describe the measures you will use to minimise dust generation during the process of supplying shredded wood feedstock to the biomass building walking floors by loading shovel from the feedstock preparation area.

Section 1.3.2 of application document, 3016/R/002/05, notes how feedstock shredded wood is fed to the biomass building. The shredding of wood is already permitted at Tudor Griffiths

Limited, Wood Lane, but the movement of shredded wood to the biomass plant is a new operation with a potential to generate dust. Further information is required to demonstrate how dust is controlled and minimised.

Noise:

30. (a) Define all expected new noise sources and their levels in dB from the biomass plant.
(b) Outline how noise from the operation of the biomass plant will be mitigated.

Section 3.3.3 of application document, 3016/R/005/02, notes that “The proposed activity may generate some noise and vibrations. This is expected to result primarily from the loading of feedstock into storage trays.” Figure 1 (Process Flow Chart) notes that noise from biomass plant operations is controlled by use of Best Available Techniques (Table 2) and restriction on plant operation to working hours specified. Further information is required to demonstrate how these controls actively reduce the potential for noise impact at sensitive local receptors.

There is no reference to mitigation of noise in Table 2 (Point Source Emission Mitigation Best Available Techniques (BAT)).

Containment of fuel tank.

31. (a) Confirm if the fuel tank located outside the biomass plant is a new addition to the installation as a result of the operation of the biomass plant.
(b) Confirm if the fuel tank is located within a purpose-built concrete bund capable of containing 110% of the contents of that tank or demonstrate how this fuel is contained to prevent loss of fuel from the tank in compliance with the guidelines in CIRIA (Construction Industry Research and Information Association) C736 (*Containment systems for the prevention of pollution. Secondary, tertiary and other measures for industrial and commercial premises*) (<https://www.ciria.org/ItemDetail?iProductCode=C736F&Category=FREEPUBS>).

Drawing, Schematic Site Layout – Biomass (TGE/09/A), indicates a fuel tank outside of the biomass plant. It is not stated in the application if this fuel tank at that location is an addition to the installation as a result of operation of the biomass plant. You must demonstrate that physical containment systems are in place, in compliance with CIRIA C736 guidance, to prevent loss of fuel from that tank.

END OF NOTICE.