



# Environmental Permit Application - Monkmoor Sewage Treatment Works

Air Quality Impact Assessment

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Severn Trent Water Limited



## Environmental Permit Application - Monkmoor Sewage Treatment Works

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## Executive Summary

Under the Industrial Emissions Directive (IED) the existing anaerobic digestion assets at Monkmoor Sewage Treatment Works (STW) require an Environmental Permit (EP). The scope of anaerobic digestion activities includes all treatment stages and incorporates directly associated activities such as a combined heat and power (CHP) gas engine and boilers.

Severn Trent Water Limited operate a STW near the town of Shrewsbury, (SY2 5TL). These operations include one existing ENER-G 499B CHP engine (with a thermal input capacity of 1.3 MW<sub>th</sub>) and three existing boilers (each with a thermal input capacity of between 0.4 MW<sub>th</sub> and 0.5 MW<sub>th</sub>).

### Assessed Combustion Plant

Medium Combustion Plant (MCP) Information				
MCP specific identifier*	Monkmoor - ENER-G 499B Biogas CHP Unit	Monkmoor – Auxiliary boiler	Monkmoor – Auxiliary boiler	Monkmoor – Auxiliary boiler
12-digit grid reference or latitude/longitude	E 351753 N 313543	E 351781 N 313537	E 351783 N 313536	E 351776 N 313541
Rated thermal input (MW) of the MCP	1.3	0.4	0.4	0.5
Type of MCP (diesel engine, gas turbine, other engine or other MCP)	Gas engine	Boiler	Boiler	Boiler
Type of fuels used: gas oil (diesel), natural gas, gaseous fuels other than natural gas	Biogas	Dual fuelled (biogas / LFO). Modelled with biogas.	Dual fuelled (biogas / LFO). Modelled with biogas.	Dual fuelled (biogas / LFO). Modelled with biogas.
Date when the new MCP was first put into operation (DD/MM/YYYY)	18/04/2018	Pre-2010	Pre-2010	Pre-2010
Sector of activity of the MCP or the facility in which it is applied (NACE code**)	E.37.00	E.37.00	E.37.00	E.37.00
Expected number of annual operating hours of the MCP and average load in use	8,760 (modelled)	8,760 (modelled)	8,760 (modelled)	8,760 (modelled)
Where the option of exemption under Article 6(8) is used the operator (as identified on Form A) should sign a declaration here that the MCP will not be operated more than the number of hours referred to in this paragraph	N / A	N / A	N / A	N / A

The Environmental Permit application is collated to include the required forms: Part A, B2.5 and F1. As the site has a CHP engine, the information required to complete Appendix 1 of application form Part B2.5 is included within this document.

The Air Quality Impact Assessment presented within this report is required to support the EP application and assesses the potential for significant air quality effects from the operation of the CHP engine and boilers at the Monkmoor STW.

The potential impacts were determined for the following aspects.

- The potential impact on human health due to emissions of pollutants. The pollutants considered include nitrogen dioxide (NO<sub>2</sub>); carbon monoxide (CO); sulphur dioxide (SO<sub>2</sub>), total volatile organic compounds (TVOC's) and particulate matter (PM<sub>10</sub>, particles with an aerodynamic diameter of 10 microns or less and PM<sub>2.5</sub>, particles with an aerodynamic diameter of 2.5 microns or less).
- The potential impact on vegetation and ecosystems due to emissions of oxides of nitrogen (NO<sub>x</sub>) and SO<sub>2</sub>.

This assessment has been carried out on the assumption that the CHP engine and boilers would operate continuously at maximum load throughout the year (i.e. 8,760 hours). In practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, the boilers are unlikely to operate simultaneously and for more than 6,000 hours per year.

### Human receptors

The assessment indicates that the predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. At sensitive human receptor locations, the predicted long-term (i.e. annual mean) NO<sub>2</sub> and particulate (PM<sub>10</sub> and PM<sub>2.5</sub>) contributions are considered 'not significant'. For short-term NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub> and CO concentrations at modelled off-site locations and sensitive human receptor locations, the contributions are also considered 'not significant'.

The maximum predicted modelled off-site concentrations exceed the environmental quality standards for 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations and 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations. The maximum predicted concentrations occur just outside the site boundary with the dispersion of pollutants likely to be impacted by the effects of building downwash. Although exceedances are predicted at an off-site location, at the tree lined boundary of an agricultural field, modelled concentrations at the nearest sensitive human receptors (which are closer than the nearest public right of way (PRoW)) to the site (i.e. R12 – R21) are all below the relevant Environmental Quality Standard (EQS). Furthermore, the corresponding isopleths show that exceedances of the relevant EQS are only predicted in a small area of the agricultural field in close proximity to the site. Further analysis of the effects of building downwash in the model and how it impacts on predicted concentrations at sensitive human receptors and off-site locations was also undertaken. The maximum predicted 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> process contribution at a modelled off-site location reduced from 3,236.1 µg/m<sup>3</sup> to 89.9 µg/m<sup>3</sup> when buildings were removed from the air dispersion model.

In the absence of an EQS for TVOC's, comparison of the annual mean and 24-hour mean predicted concentrations have been made against the annual mean and 24-hour mean environmental quality standard for benzene (C<sub>6</sub>H<sub>6</sub>). This represents a worst-case scenario for VOCs because it assumes all VOC contributions comprise benzene. For annual mean and maximum 24-hour mean TVOC concentrations at a sensitive human receptor location, the respective PECs exceed the daily mean standard for benzene.

However, TVOC emissions from the assessed combustion plant will largely comprise unburnt methane gas from the biogas fuel (up to 75% composition (Naskeo Environment, 2009)), which is not directly harmful to human health. If the contribution of methane (CH<sub>4</sub>) is removed from the process contribution, there would be no exceedance of the short-term relevant standard. Therefore, when considering the conservative approach to the assessment and based on professional judgement, the contribution of TVOC's is considered 'not significant'.

This assessment has been carried out on the assumption that the CHP engine and boilers would operate continuously at maximum load throughout the year (i.e. 8,760 hours). This is a conservative assumption as, in practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, the boilers are unlikely to operate simultaneously and for more than 6,000 hours per year.

### **Protected conservation areas**

For critical levels, the results indicate that at the assessed Ramsar's, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a). For the assessed local nature sites, the annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 100% of the long-term environmental standard and the impact can also be described as 'insignificant'.

For the 24-hour mean critical level for NO<sub>x</sub>, the results indicate that at the assessed Ramsar's, the maximum PC for short-term mean concentrations are less than 10% of the short-term environmental standard for protected conservation areas (i.e. the 24-hour mean critical level for NO<sub>x</sub>) and the impact can be described as 'insignificant'. For the assessed local nature sites, the respective short-term NO<sub>x</sub> PCs are less than 100% of the short-term environmental standard and can be described as 'insignificant'.

For acid deposition and nutrient nitrogen deposition, the results indicate that at the assessed Ramsar's, the respective PCs are less than 1% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a). For the assessed local nature sites, the respective PCs are less than 100% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

As discussed above, the conservative approach adopted for this assessment means the predicted concentrations presented are likely to be higher than would reasonably be expected.

### **Summary**

Based on the above assessment, it is concluded that the assessed CHP engine and boilers are acceptable from an air quality perspective.

# 1. Introduction

## 1.1 Background

Under the Industrial Emissions Directive (IED)<sup>1</sup> the anaerobic digestion assets at Monkmoor Sewage Treatment Works (STW) are required to be included in an Environmental Permit (EP). The scope of anaerobic digestion activities includes all treatment stages and incorporates directly associated activities such as a combined heat and power (CHP) gas engine and boilers.

Severn Trent Water Limited (hereafter 'Severn Trent') currently operates one biogas fuelled ENER-G 499B Biogas CHP Unit (with a thermal input capacity of 1.3 MW<sub>th</sub>) and three dual-fuelled<sup>2</sup> boilers (each with a thermal input capacity of between 0.4 MW<sub>th</sub> and 0.5 MW<sub>th</sub>) at the Monkmoor STW, (SY2 5TL) (hereafter 'the site'). Jacobs UK Limited (hereafter 'Jacobs') has carried out an Air Quality Impact Assessment (AQIA) on behalf of Severn Trent to assess the potential impact of emissions from the existing CHP engine and boilers.

## 1.2 Study Outline

This AQIA is required to support the EP application and assesses the likely significant air quality effects of emissions to air from the CHP engine and boilers at the site. The air quality assessment has been carried out following the relevant Environment Agency guidance (Environment Agency, 2021a; 2021b). The AQIA considers the following.

- The potential impact on human health due to emissions of pollutants. The pollutants considered include nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), sulphur dioxide (SO<sub>2</sub>), total volatile organic compounds (TVOC's) and particulate matter (PM<sub>10</sub>, particles with an aerodynamic diameter of 10 microns or less and PM<sub>2.5</sub>, particles with an aerodynamic diameter of 2.5 microns or less).
- The potential impact on vegetation and ecosystems due to emissions of oxides of nitrogen (NO<sub>x</sub>) and SO<sub>2</sub>.

In order to support the Medium Combustion Plant Directive (MCPD) EU/2015/2193<sup>3</sup> and Specified Generators (Schedule 25A and 25B) Environment Permit (EP) application, the site was previously modelled in 2018. The previous assessment only considered the existing CHP engine. This assessment now includes the existing boilers and incorporates a revised CHP engine stack location.

The site boundary (represented by the approximate site fenceline) is presented in Figure 1.

This report draws upon information provided from the following parties:

- Severn Trent;
- ADM Ltd;
- Centre for Ecology and Hydrology (CEH);
- Centrica Business Solutions (Centrica);
- Joint Nature Conservation Committee (JNCC);
- Shropshire Council; and
- Department for Environment, Food and Rural Affairs (Defra).

This report includes a description of the emission sources, description of methodology and significance criteria, a review of the baseline conditions including an exploration of the existing environment of the site and

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<sup>1</sup> European Directive 2010/75/EU.

<sup>2</sup> Dual fuelled utilising biogas (primary fuel) or gas-oil.

<sup>3</sup> European Parliament and the Council of the European Union, Medium Combustion Plant Directive EU/2015/2193 of 25 November 2015 on the limitation of emissions of certain pollutants into the air from medium combustion plants.



surrounding area, an evaluation of results and the potential impact of emissions on human health and protected conservation areas during operation and, finally, conclusions of the assessment.

## 2. Emission Sources

### 2.1 Emission Sources to Air

The location of the assessed CHP engine (emission point reference A1) and boilers (emission point reference A2, A3 & A4) are presented in Figure 1.

The CHP engine and boilers (when utilising biogas) are fuelled by biogas generated from the sites' anaerobic digestion process and emissions were modelled on this basis. As discussed previously, the boilers are a dual-fuel design and can run on biogas or gas-oil. However, for this assessment they have been modelled utilising biogas as this gives a worst-case scenario for emissions of NO<sub>x</sub>, typically the pollutant of main concern. The modelling only considers emissions from the CHP engine and boilers and no other emission points to air at the site have been included in the assessment.

Table 1 presents the emission sources to air considered in this assessment.

Table 1: Combustion plant to be assessed

Parameters	ENER-G 499B Biogas CHP Unit (1.3 MW <sub>th</sub> )	Boiler (0.4 MW <sub>th</sub> )	Boiler (0.4 MW <sub>th</sub> )	Boiler (0.5 MW <sub>th</sub> )
Modelled fuel	Biogas	Biogas	Biogas	Biogas
Emission point	A1	A2	A3	A4

This assessment has been carried out on the assumption that the CHP engine and boilers would operate continuously at maximum load throughout the year (i.e. 8,760 hours). This is a conservative assumption as, in practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, the boilers are unlikely to operate simultaneously and for more than 6,000 hours per year. However, for predicted short-term modelled concentrations, it is assumed all assessed combustion plant operate continuously and simultaneously as this approach ensures that the worst-case or maximum short-term modelled concentrations are quantified (further consideration of this is provided in Appendix A).

### 2.2 Emissions Data

It should be noted from the 1<sup>st</sup> January 2030, certain pollutant emission concentrations from the assessed combustion plant must adhere to emission concentration limits as set out in the Medium Combustion Plant Directive (MCPD) EU/2015/2193<sup>3</sup> (European Union, 2015) and as transposed into Schedule 25A of The Environmental Permitting (England and Wales) (Amendment) Regulations 2018 (UK Government, 2018).

For the assessed CHP engine, the NO<sub>x</sub>, CO and TVOC emission concentrations were derived from the Environment Agency's 'Guidance for monitoring landfill gas engine emissions' (Environment Agency, 2010). For SO<sub>2</sub>, the emission concentration applied in the assessment is derived from monitoring of the biogas (and more specifically hydrogen sulphide (H<sub>2</sub>S))<sup>4</sup> at the Monkmoor site (Severn Trent, 2021). Further consideration of this is provided in Appendix B. For particulates, in the absence of a specific emission limit value, the emission concentration was derived from a previous study of landfill gas engines (Land Quality Management Ltd, 2002).

For the boilers, as a worst-case approach to the assessment, the NO<sub>x</sub> emission concentration is based on the emission limit values for existing MCP other than engines and gas turbines as regulated under the MCPD<sup>3</sup>. For SO<sub>2</sub>, the emission concentration applied in the assessment is derived from monitoring of the biogas (and more specifically H<sub>2</sub>S)<sup>4</sup> at the Monkmoor site (Severn Trent, 2021). For CO and TVOC, in the absence of a specific emission limit value, the CO emission concentration was obtained from Defra's Process Guidance Note 1/3, 'Statutory Guidance for Boilers and Furnaces 20-50MW thermal input' (Defra, 2012) and the TVOC emission

<sup>4</sup> A maximum H<sub>2</sub>S concentration of 297 mg/m<sup>3</sup> was recorded on-site between 1<sup>st</sup> December 2020 and 1<sup>st</sup> December 2021. Further information on the conversion of H<sub>2</sub>S to SO<sub>2</sub> is provided in Appendix B.

concentration was derived from the Environment Agency's '*Guidance for monitoring landfill gas engine emissions*' (Environment Agency, 2010).

For the assessed CHP engine, the exhaust gas volumetric flow, exhaust gas temperature and moisture content were obtained from the ENER-G 499B Biogas CHP Unit Technical Datasheet (Centrica, 2018). In the absence of information regarding oxygen content, the data used in the model is based on professional judgment acquired from previous work involving biogas fuelled CHP engines of a similar thermal input capacity.

For the boilers, the exhaust gas volumetric flow was determined using stoichiometric calculations based on the combustion of biogas at the maximum thermal input rating of the respective boiler. In the absence of information regarding temperature, oxygen and moisture content of the boilers, the data used in the model is based on professional judgement acquired from previous work involving biogas fuelled boilers of a similar thermal input capacity.

The emissions inventory of releases to air from the CHP engine and boilers is provided in Appendix A.

### 3. Assessment Methodology

This section presents a summary of the methodology used for the assessment of the potential impacts of the site. A full description of the study inputs and assumptions are provided in Appendix A.

#### 3.1 Assessment Location

For this assessment, 26 of the closest sensitive human receptors (such as residential properties, schools, residential care homes and Public Rights of Way (PRoW)) near the site were identified for modelling purposes. The location of these receptors are presented in Figure 2.

In line with the Environment Agency guidance '*Air emissions risk assessment for your environmental permit*' (Environment Agency, 2021a), it is necessary to identify protected conservation areas within the following distances from the site:

- European sites (i.e. Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar sites) within 10 km; and
- Site of Special Scientific Interest (SSSI) and local nature sites (i.e. ancient woodlands, local wildlife sites (LWS) and national and local nature reserves (NNR and LNR)) within 2 km.

Based on these criteria; Midland Mere and Mosses Phase 2 Ramsar; Midland Mere and Mosses Phase 1 Ramsar; Abbey Wood/New Coppice Ancient Woodland; Rea Brook Valley LNR, River Severn (Shrewsbury to Emstrey) LWS; Monkmoor Pool LWS; Sundorne Canal LWS; Sundorne Pool LWS and Haughmond Hill LWS have been included in the assessment.

The location of the assessed protected conservation areas are presented in Figure 3 and further details are set out in Appendix A.

#### 3.2 Overall Methodology

The assessment was carried out using an atmospheric dispersion modelling technique. Atmospheric Dispersion Modelling System (ADMS) version 5.2.4 was used to model releases of the identified substances. The ADMS model predicts the dispersion of operational emissions from a specific source (e.g. a stack), and the subsequent concentrations over an identified area (e.g. at ground level across a grid of receptor points) or at specified points (e.g. a residential property). ADMS was selected because this model is fit for the purpose of modelling the emissions from the type of sources on-site (i.e. point source emissions from a combustion source) and is accepted as a suitable assessment tool by local authorities and the Environment Agency.

The modelling assessment was undertaken in accordance with the Environment Agency guidance '*Air emissions risk assessment for your environmental permit*' (Environment Agency, 2021a).

A summary of the dispersion modelling procedure is set out below.

- 1) Information on plant location and stack parameters were supplied by Severn Trent (Severn Trent, 2021). Information on the CHP engine and the boilers were obtained from various sources as described in Section 2.2.
- 2) Five years of hourly sequential data recorded at the Shawbury meteorological station (2015 – 2019 inclusive) were used for the assessment (ADM Ltd, 2021).
- 3) Information on the main buildings located on-site, which could influence dispersion of emissions from the CHP engine and boiler stacks, were estimated from Defra's environmental open-data applications and datasets (Defra, 2021a) and Google Earth (Google Earth, 2021).
- 4) The maximum predicted concentrations (at a modelled height of 1.5 m or 'breathing zone') at the assessed sensitive human receptor locations R1 – R23 (representing long-term exposure at residential properties) were considered for the assessment of annual mean, 24-hour mean, 8-hour mean, 1-hour mean and 15-

minute mean pollutant concentrations within the study area. For receptors R24 – R26 (representing a footpath), only the 1-hour mean and 15-minute mean concentrations were considered. The maximum predicted concentrations at an off-site location in the vicinity of the site were considered for the assessment of short-term (1-hour and 15-minute mean) concentrations.

- 5) The above information was entered into the dispersion model.
- 6) The dispersion model was run to provide the Process Contribution (PC). The PC is the estimated maximum environmental concentration of substances due to releases from the process alone. The results were then combined with baseline concentrations (see Section 4) to provide the total Predicted Environmental Concentration (PEC) of the substances of interest.
- 7) The PECs were then assessed against the appropriate environmental standards for air emissions for each substance set out in the Environment Agency's guidance (Environment Agency, 2021a) document to determine the nature and extent of any potential adverse effects.
- 8) Modelled concentrations were processed using geographic information system (GIS) software (ArcMap 10.8.1) to produce contour plots of the model results. These are provided for illustrative purposes only; assessment of the model results was based on the numerical values outputted by the dispersion model on the model grid (see Figure 2) and at the specific receptor locations and were processed using Microsoft Excel.
- 9) The predicted concentrations of NO<sub>x</sub> and SO<sub>2</sub> were also used to assess the potential impact on critical levels and critical loads (i.e. acid and nutrient nitrogen deposition) (see Section 3.3.2) at the assessed protected conservation area. Details of the deposition assessment methodology are provided in Appendix C.

In addition to the above, a review of existing ambient air quality in the area was undertaken to understand the baseline conditions at the site and at receptors within the study area. These existing conditions were determined by reviewing the monitoring data already available for the area and other relevant sources of information. The review of baseline air quality is set out in Section 4.

Where appropriate, a conservative approach has been adopted throughout the assessment to increase the robustness of the model predictions. In addition, an analysis of various sensitivity scenarios has also been carried out (see Section 5.3) to determine how changes to model parameters (e.g. differing surface roughness values or modelling without considering buildings) may impact on predicted concentrations at sensitive human receptors and off-site locations.

### 3.3 Assessment Criteria

#### 3.3.1 Environmental Quality Standards: Human Receptors

In the UK, the focus on local air quality is reflected in the air quality objectives (AQOs) set out in the *Air Quality Strategy for England, Scotland, Wales and Northern Ireland* (AQS) (Defra and the Devolved Administrations, 2007). The AQS stipulates a number of air quality objectives for nine main air pollutants with respect to ambient levels of air quality (Defra, 2007). The AQOs are similar to the limit values that were transposed from the relevant EU directives into UK legislation by *The Air Quality Standards Regulations 2010* (UK Government, 2010). The objectives are based on the current understanding of health effects of exposure to air pollutants and have been specified to control health and environmental risks to an acceptable level. They apply to places where people are regularly present over the relevant averaging period. The objectives set for the protection of human health and vegetation of relevance to the project are summarised in Table 2. Relevant Environmental Assessment Levels (EALs) set out in the Environment Agency guidance (Environment Agency, 2021a) are also included in Table 2 where these supplement the AQOs.

For the purposes of reporting, the AQOs and EALs have been collectively termed as Environmental Quality Standards (EQSs).

Table 2: Air quality objectives and environmental assessment levels

Pollutant	EQS ( $\mu\text{g}/\text{m}^3$ )	Concentration measured as
NO <sub>2</sub>	40	Annual mean
	200	1-hour mean, not to be exceeded more than 18 times a year (99.79 <sup>th</sup> percentile)
CO	10,000	Maximum daily 8 hour running mean (100 <sup>th</sup> percentile)
	30,000	Maximum 1-hour mean (100 <sup>th</sup> percentile)
SO <sub>2</sub>	125	24-hour mean not to be exceeded more than 3 times a year (99.18 <sup>th</sup> percentile)
	350	1-hour mean not to be exceeded more than 24 times a year (99.73 <sup>rd</sup> percentile)
	266	15-minute mean not to be exceeded more than 35 times a year (99.9 <sup>th</sup> percentile)
PM <sub>10</sub>	40	Annual mean
	50	24-hour mean, not to be exceeded more than 35 times a year (90.41 <sup>st</sup> percentile)
PM <sub>2.5</sub>	20 <sup>3</sup>	Annual mean
TVOC <sup>1</sup>	5 <sup>2</sup>	Annual mean
	30	Maximum 24-hour mean (100 <sup>th</sup> percentile)

Note 1: VOCs may contain a wide range of organic compounds and it is often difficult to determine or identify each and every compound present. The TVOC emissions from the assessed combustion plant will largely comprise methane which is not directly harmful to human health.

Note 2: For the purposes of this assessment, the annual mean and 24-hour mean AQO for benzene (C<sub>6</sub>H<sub>6</sub>) has been applied as it is a standard substitute that adequately represents a worst-case scenario for VOCs.

Note 3: Amendment to the Air Quality Standards Regulations 2010 as per the Environment (Miscellaneous Amendments) (EU Exit) Regulations 2020 (UK Government, 2020).

For the assessment of long-term average concentrations (i.e. the annual mean concentrations) at human receptors, impacts were described using the following criteria:

- if the PC is less than 1% of the long-term EQS, the contribution can be considered as 'insignificant' and not representative of a significant effect (i.e. not significant) (Environment Agency, 2021b);
- if the PC is greater than 1% of the EQS but the PEC is less than 70% of the long-term air quality objective, based on professional judgement, this would be classed as 'not significant'; and
- where the PC is greater than 1% of the EQS and the PEC is greater than 70% of the EQS, professional judgement is used to determine the overall significance of the effect (i.e. whether the effect would be 'not significant' or 'significant'), taking account of the following:
  - the scale of the changes in concentrations;
  - whether or not an exceedance of an EQS is predicted to arise in the study area where none existed before, or an exceedance area is substantially increased as a result of the development; and
  - uncertainty, including the influence and validity of any assumptions adopted in undertaking the assessment.

For the assessment of short-term average concentrations (e.g. the 1-hour mean NO<sub>2</sub> concentrations, and the 15-minute, 1-hour and 24-hour mean SO<sub>2</sub> concentrations etc.), impacts were described using the following criteria:

- if the PC is less than 10% of the short-term EQS, this would be classed as 'insignificant' and not representative of a significant effect (i.e. not significant) (Environment Agency, 2021b);
- if the PC is greater than 10% of the EQS but less than 20% of the headroom between the short-term background concentration and the EQS, based on professional judgement, this can also be described as not significant; and
- where the PC is greater than 10% of the EQS and 20% of the headroom, professional judgement is used to determine the overall significance of the effect (i.e. whether the effect would be not significant or significant) in line with the approach specified above for long-term average concentrations.

Environment Agency guidance recommends that further action will not be required if proposed emissions comply with Best Available Techniques Associated Emission Levels (BAT AELs) and resulting PECs do not exceed the relevant EQS (Environment Agency, 2021a).

### 3.3.2 Environmental Quality Standards: Protected Conservation Areas

#### Critical levels

The environmental standards set for protected conservation areas of relevance to the project are summarised in Table 3 (Environment Agency, 2021a).

Table 3: Air Quality Objectives and Environmental Assessment Levels for protected conservation areas

Pollutant	EQS ( $\mu\text{g}/\text{m}^3$ )	Concentration measured as
NO <sub>x</sub>	30	Annual mean limit value for the protection of vegetation (referred to as the "critical level")
	75	Maximum 24-hour mean for the protection of vegetation (referred to as the "critical level")
SO <sub>2</sub>	10	Annual mean limit value for the protection of vegetation (referred to as the "critical level") where lichens or bryophytes are present
	20	Annual mean limit value for the protection of vegetation (referred to as the "critical level") where lichens or bryophytes are not present

#### Critical loads

Critical loads for pollutant deposition to statutorily designated habitat sites in the UK and for various habitat types have been published by the CEH and are available from the APIS website. Critical Loads are defined on the APIS website (Centre for Ecology and Hydrology, 2021) as:

*"a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge".*

Compliance with these benchmarks is likely to result in no significant adverse effects on the natural environment at these locations. The critical loads for the designated habitat sites considered in this assessment are set out in Table 4. For the assessed Ramsar's, the Search by Location tool function on the APIS website was used to determine the relevant critical loads for the assessed protected conservation areas based on the likely vegetation type inhabiting the respective Ramsar site (JNCC, 2021a, 2021b). For the assessed local nature sites, the Search by Location function on the APIS website was also used. Where both short and tall vegetation type is assumed to inhabit the assessed local nature sites, the acid grassland and broadleaved, mixed and yew woodland feature were selected on the APIS website.

Table 4: Critical loads for modelled protected conservation areas

Receptor ref	Protected conservation area	Habitat feature applied	Vegetation type (for deposition velocity)	Critical load			
				Acid deposition (kEqH <sup>+</sup> /ha/year)			Nitrogen deposition (kg N/ha/year)
				CLMaxS	CLMinN	CLMaxN	Minimum
H1	Midland Mere and Mosses Phase 2 Ramsar	Bogs	Short	0.167	0.321	0.488	5
		Broadleaved, Mixed and Yew Woodland	Tall	2.168	0.357	2.525	10
H2	Midland Mere and Mosses Phase 1 Ramsar	Acid grassland	Short	0.193	0.321	0.514	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.362	0.357	1.719	10
H3	Abbey Wood/New Coppice Ancient Woodland	Broadleaved, Mixed and Yew Woodland	Tall	1.331	0.357	1.688	10
H4	Rea Brook Valley Local Nature Reserve	Acid grassland	Short	0.860	0.223	1.083	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.453	0.142	1.595	10
H5a	River Severn (Shrewsbury to Emstrey) LWS	Acid grassland	Short	0.860	0.223	1.083	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.454	0.142	1.596	10
H5b		Acid grassland	Short	0.860	0.438	1.298	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.332	0.357	1.689	10
H5b		Acid grassland	Short	0.860	0.223	1.083	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.455	0.142	1.597	10
H5d		Acid grassland	Short	0.860	0.223	1.083	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.455	0.142	1.597	10
H5e		Acid grassland	Short	0.860	0.223	1.083	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.455	0.142	1.597	10
H6	Monkmoor Pool LWS	Acid grassland	Short	0.860	0.223	1.083	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.454	0.142	1.596	10
H7		Acid grassland	Short	1.610	0.438	2.048	5



Receptor ref	Protected conservation area	Habitat feature applied	Vegetation type (for deposition velocity)	Critical load			
				Acid deposition (kEqH <sup>+</sup> /ha/year)			Nitrogen deposition (kg N/ha/year)
				CLMaxS	CLMinN	CLMaxN	Minimum
	Sundorne Canal LWS	Broadleaved, Mixed and Yew Woodland	Tall	2.448	0.357	2.805	10
H8	Sundorne Pool LWS	Acid grassland	Short	0.860	0.438	1.298	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.332	0.357	1.689	10
H9	Haughmond Hill LWS	Acid grassland	Short	0.860	0.438	1.298	5
		Broadleaved, Mixed and Yew Woodland	Tall	1.331	0.357	1.688	10

Critical load functions for acid deposition are specified on the basis of both nitrogen and sulphur derived acid. The critical load function contains a value for sulphur derived acid and two values for nitrogen derived acid deposition (a minimum and maximum value). The APIS website provides advice on how to calculate the process contribution (PC – emissions from the modelled process alone) and the predicted environmental concentrations (PEC – the PC added to the existing deposition) as a percentage of the acid critical load function and how to determine exceedances of the critical load function. This guidance was adopted for this assessment. The minimum of the range of nitrogen critical loads was used for the assessment in line with the advice on the APIS website (Centre for Ecology and Hydrology, 2021).

### Significance Criteria – Ramsar's

With regard to concentrations at the assessed designated habitat sites, the Environment Agency guidance (Environment Agency, 2021a) states emissions can be described as insignificant and no further assessment is required (including the need to calculate PECs) if:

- the short-term PC is less than 10% of the short-term environmental standard for protected conservation areas; or
- the long-term PC is less than 1% of the long-term environmental standard for protected conservation areas.

Where appropriate, the significance of the predicted long-term (annual mean) concentrations or deposition at protected conservation areas were determined in line with Environment Agency guidance (Environment Agency, 2021a) summarised as follows:

- where the PC is less than 1% of the relevant critical level or critical load, the emission is not likely to have a significant effect alone or in combination irrespective of the existing concentrations or deposition rates;
- where the PC is above 1%, further consideration of existing background concentrations or deposition rates is required, and where the total concentration or deposition is less than 70% of the critical level or critical load, calculated in combination with other committed projects or developments as appropriate, the emission is not likely to have a significant effect; and
- where the contribution is above 1%, and the total concentration or deposition rate is greater than 70% of the critical level or critical load, either alone or in combination with other committed projects or developments, then this may indicate a significant effect and further consideration is likely to be required.

The above approach is used to give a clear definition of what effects can be disregarded as insignificant, and which need to be considered in more detail in relation to the predicted annual mean concentrations or deposition.

For short-term mean concentrations (i.e. the 24-hour mean critical level for NO<sub>x</sub>) where the PC is less than 10% of the critical level then it would be regarded as 'insignificant'. A potentially significant effect would be identified where the short-term PC from the modelled sources would lead to the total concentration exceeding the critical level. Further consideration is likely to be required in this situation.

#### **Significance Criteria – Ancient woodland, LNR and LWS's**

The relevant significance criteria for these protected conservation areas are set out below.

With regard to concentrations or deposition rates at local nature sites, the Environment Agency guidance (Environment Agency, 2021a) states emissions can be described as 'insignificant' and no further assessment is required (including the need to calculate PECs) if:

- the short-term PC is less than 100% of the short-term environmental standard for protected conservation areas; or
- the long-term PC is less than 100% of the long-term environmental standard for protected conservation areas.

The above approach is used to give a clear definition of what effects can be disregarded as 'insignificant', and which need to be considered in more detail in relation to the predicted annual mean concentrations or deposition.

## 4. Existing Environment

### 4.1 Site Location

The site is situated approximately 2.8 km east-northeast from the centre of the town of Shrewsbury, Shropshire. The area surrounding the site generally comprises a mixture of residential properties to the south and west of the site and open grassland to the north and east of the site. Monkmoor Pool LWS is adjacent to the eastern boundary of the site and the River Severn is in close proximity to the northern and eastern boundary of the site.

There are several sensitive human receptors in the vicinity of the site, the most relevant of which have been identified from local mapping and are summarised in Appendix A and presented in Figure 2. The nearest modelled residential property is approximately 60 m west-southwest of the CHP engine (based on the CHP engine stack location NGR E 351753 N 313543).

### 4.2 Local Air Quality Management

A review of baseline air quality was carried out prior to undertaking the air quality assessment. This was carried out to determine the availability of baseline air quality data recorded in the vicinity of the site and also if data from other regional or national sources such as the UK Air Information Resource (UK-AIR) (Defra, 2021b) website could be used to represent background concentrations of the relevant pollutants in the vicinity of the site.

As part of the Local Air Quality Management (LAQM) process, Shropshire Council has declared two air quality management areas (AQMA's) within its administrative boundary. The nearest AQMA is termed 'AQMA No.3' and was declared for exceedances of the annual mean AQO for NO<sub>2</sub> in 2003. This AQMA is approximately 2.1 km west-southwest of the site at its closest point (based on the location of the CHP engine stack) and is not considered further in the assessment.

Shropshire Council also carries out regular assessments and monitoring of air quality within its administrative boundary as part of the LAQM process. The most recent Air Quality Annual Status Report (Shropshire Council, 2020) was reviewed to determine concentrations of NO<sub>2</sub> in the vicinity of the site. It should be noted that none of the other assessed pollutants are monitored by Shropshire Council. Table 5 presents information on the nearest monitoring locations to the site.

Table 5: Nearest monitoring locations to the site

Site ID	Description	Site type	Location	Distance and direction from CHP engine	Pollutants monitored	2019 Annual mean concentration (µg/m <sup>3</sup> )
<b>Automatic monitoring</b>						
Shropshire Council did not undertake any continuous monitoring during 2019						
<b>Non-automatic monitoring (diffusion tubes)</b>						
DF468	Downpipe on front of No 3 Whitchurch Road.	Roadside	E 350376 N 314599	1.7 km, NW	NO <sub>2</sub>	20.9
DF480	Lamp post by takeaway near Britannia Inn	Roadside	E 349466 N 313151	2.3 km, WSW	NO <sub>2</sub>	31.6

These monitoring locations are not considered representative of the site and surrounding area due to the roadside monitoring location type and/or respective distance from the site. Monitoring site 'DF468' is adjacent to the A5191 (Whitchurch Road) and monitoring site 'DF480' is adjacent to the A5191 (St Michael Street).

For the assessed pollutants, information on background air quality in the vicinity of the site was obtained from Defra background map datasets (Defra, 2021b). The 2018-based background maps by Defra are estimates based upon the principal local and regional sources of emissions and ambient monitoring data. For SO<sub>2</sub> and CO

concentrations, the 2001-based background maps were used. For TVOC concentrations, the 2010-based background maps for C<sub>6</sub>H<sub>6</sub> were used. These background concentrations are presented in Table 6.

As it is necessary to determine the potential impact of emissions from the site on the assessed protected conservation areas, the background concentrations of NO<sub>x</sub> and SO<sub>2</sub> were also identified for the assessed protected conservation areas. These background concentrations were also obtained from Defra background map datasets (Defra, 2021b) and are displayed in Table 6.

Table 6: Background concentrations: adopted for use in assessment for assessed human receptors and protected conservation areas

Pollutant	Annual mean concentration (µg/m <sup>3</sup> )	Description
<b>Human receptors</b>		
NO <sub>2</sub>	6.7 – 7.9	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
CO	128	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, scaled from 2001-based map to 2021 concentration
PM <sub>10</sub>	11.0 – 12.7	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
PM <sub>2.5</sub>	6.9 – 7.3	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
SO <sub>2</sub>	4.0	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2001 map concentration
C <sub>6</sub> H <sub>6</sub>	0.3	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2010 map concentration for benzene
<b>Protected conservation areas</b>		
NO <sub>x</sub>	5.7 – 10.5	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2021 map concentration
SO <sub>2</sub>	2.4 – 4.0	Defra 1 km x 1 km background map value for the assessed sensitive human receptor locations, 2001 map concentration

The long-term background concentrations were doubled to estimate the short-term background concentrations in line with the Environment Agency guidance (Environment Agency, 2021a).

### 4.3 Existing Deposition Rates

Existing acid and nutrient nitrogen deposition levels were obtained from APIS (Centre for Ecology and Hydrology, 2021). As a conservative approach to the assessment, it is assumed the vegetation type selected is present at the specific modelled location within the assessed protected conservation area.

The existing deposition values at the assessed ecological designations are set out in Table 7.

Table 7: Existing deposition at modelled habitat sites

Receptor ref	Protected conservation area	Vegetation type (for deposition velocity)	Existing deposition rates		
			Acid deposition (kEqH+/ha/year)		Nutrient N deposition (kg N/ha/year)
			Nitrogen	Sulphur	Nitrogen
H1	Midland Mere and Mosses Phase 2 Ramsar	Short	1.65	0.12	23.10
		Tall	2.90	0.15	40.60
H2	Midland Mere and Mosses Phase 1 Ramsar	Short	1.62	0.14	22.68
		Tall	2.80	0.17	39.20
H3	Abbey Wood/New Coppice Ancient Woodland	Tall	2.71	0.16	37.94
H4	Rea Brook Valley LNR	Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H5a	River Severn (Shrewsbury to Emstrey) LWS	Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H5b		Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H5c		Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H5d		Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H5e		Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H6	Monkmoor Pool LWS	Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H7	Sundorne Canal LWS	Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H8	Sundorne Pool LWS	Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94
H9	Haughmond Hill LWS	Short	1.54	0.13	21.56
		Tall	2.71	0.16	37.94

## 5. Results

### 5.1 Human Receptors

The results presented below are the maximum modelled concentrations predicted at any of the 26 assessed sensitive human receptor locations, the assessed AQMA and the maximum modelled concentration at any off-site location for the five years of meteorological data used in the study.

The results of the dispersion modelling are set out in Table 8, which presents the following information:

- EQS (i.e. the relevant air quality standard);
- estimated annual mean background concentration (see Section 4) that is representative of the baseline;
- PC, the maximum modelled concentrations due to the emissions from the assessed combustion plant;
- PEC, the maximum modelled concentration due to process emissions combined with estimated baseline concentrations;
- PC and PEC as a percentage of the EQS; and
- PC as a percentage of headroom (i.e. the PC as a percentage of the difference between the short-term background concentration and the EQS, for short-term predictions only).

The full results at assessed human receptor locations are presented in Appendix D.

Table 8: Results of detailed assessment

Pollutant	Averaging period	Assessment location	Maximum receptor	EQS ( $\mu\text{g}/\text{m}^3$ )	Baseline air quality level ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC / EQS (%)	PEC / EQS (%)	PC as a percentage of headroom (%)
CO	Maximum 8-hour running mean	Sensitive locations	R19	10,000	256	171.8	427.8	1.7%	4.3%	1.8%
	Maximum 1-hour mean	Maximum off-site	-	30,000	256	4,199.4	4,455.4	14.0%	14.9%	14.1%
		Sensitive locations	R21	30,000	256	247.5	503.5	0.8%	1.7%	0.8%
NO <sub>2</sub>	Annual mean	Sensitive locations	R20	40	7.9	5.0	12.9	12.4%	32.2%	-
	1-hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	-	200	15.8	3,236.1	3,251.9	1,618%	1,626%	1,757%
		Sensitive locations	R21	200	15.8	31.9	47.8	16.0%	23.9%	17.3%
SO <sub>2</sub>	24-hour mean (99.18 <sup>th</sup> percentile)	Sensitive locations	R19	125	7.9	29.8	37.7	23.8%	30.1%	25.4%
	1-hour mean (99.73 <sup>rd</sup> percentile)	Maximum off-site	-	350	7.9	3,567.7	3,575.6	1,019%	1,022%	1,043%
		Sensitive locations	R19	350	7.9	42.1	50.0	12.0%	14.3%	12.3%
	15-minute mean (99.9 <sup>th</sup> percentile)	Maximum off-site	-	266	7.9	3,752.4	3,760.4	1,411%	1,414%	1,454%
		Sensitive locations	R21	266	7.9	51.5	59.4	19.4%	22.3%	20.0%
PM <sub>10</sub>	Annual mean	Sensitive locations	R20	40	11.0	0.1	11.1	0.3%	27.8%	-
	24-hour mean (90.41 <sup>st</sup> percentile)	Sensitive locations	R20	50	22.0	0.5	22.5	1.0%	45.0%	1.8%
PM <sub>2.5</sub>	Annual mean	Sensitive locations	R20	20	6.9	0.1	7.1	0.6%	35.3%	-
TVOC	Annual mean	Sensitive locations	R20	5 (Benzene)	0.3	21.0	21.3	419%	425%	-
	Maximum 24-hour mean	Sensitive locations	R19	30 (Benzene)	0.6	197.3	197.8	658%	660%	670%

Note 1: For annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> and TVOC concentrations, 24-hour mean PM<sub>10</sub> and SO<sub>2</sub> concentrations and 8-hour mean CO concentrations, R24 – R26 have been omitted from analysis as these receptor locations represent a footpath (i.e. short-term exposure only). The full results are presented in Appendix D.

The results in Table 8 indicate that the predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. At sensitive human receptor locations, the predicted long-term (i.e. annual mean) NO<sub>2</sub> and particulate (PM<sub>10</sub> and PM<sub>2.5</sub>) contributions are considered 'not significant'. For short-term NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub> and CO concentrations at modelled off-site locations and sensitive human receptor locations, the contributions are also considered 'not significant'.

Table 8 indicates that the maximum PC for annual mean NO<sub>2</sub> at a sensitive human receptor location is 5.0 µg/m<sup>3</sup> (equating to 12.4% of the relevant EQS) and is predicted at R20, which represents a residential property approximately 70 m west of the CHP engine stack. The PC is above 1% of the relevant EQS but the PEC is less than 70% of the EQS (i.e. 32.2%) and based on professional judgement, the impact can be classed as 'not significant'.

This assessment assumes the combustion plant operate simultaneously and continuously at maximum load all year. This is a conservative assumption as, in practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, the boilers are unlikely to operate simultaneously and for more than 6,000 hours per year. An isopleth (see Figures 4) has been produced for annual mean NO<sub>2</sub> process contributions. The figure is based on the year of meteorological data which resulted in the highest PC at a sensitive human receptor location.

For the assessment of 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a sensitive human receptor location, the maximum PC of 31.9 µg/m<sup>3</sup> (which equates to 16.0% of the relevant EQS) is predicted at R21, which represents a residential property approximately 80 m west of the CHP engine stack. The PC is greater than 10% of the short-term EQS but less than 20% of the headroom between the short-term background concentration and the EQS, and based on professional judgement, the impact can be described as 'not significant'.

For the assessment of 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a modelled off-site location, the maximum PC is 3,236.1 µg/m<sup>3</sup>. The PEC of 3,251.9 µg/m<sup>3</sup> (which exceeds the relevant EQS) is predicted at NGR E 351803 N 313493, which is adjacent to the southern boundary of the site in an agricultural field with no PRoW in close proximity. The elevated predicted process contributions can be explained by the assessed 6 m tall boiler stacks being capped and their respective location adjacent to the 11.7 m tall digester tanks (see Figure 1). Therefore, the dispersion of pollutants is likely to be impacted by the effects of building downwash. Although exceedances are predicted at an off-site location, the modelled concentrations at the nearest sensitive human receptors (which are closer than any PRoW's) to the site (i.e. R12 – R21) are all below the relevant EQS. Furthermore, the assessed combustion plant are unlikely to operate simultaneously during the year which means the results are likely to be higher than would reasonably be expected. An isopleth (see Figures 5) has been produced for 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> process contributions. The figure is based on the year of meteorological data which resulted in the highest PC at a sensitive human receptor location. The isopleth shows that exceedances of the relevant EQS are only predicted in a small area of the field in close proximity to the site. Further analysis of the effects of building downwash in the model are provided in Section 5.3.

For long-term PM<sub>10</sub> and PM<sub>2.5</sub> concentrations, the respective PCs are less than 1% of the relevant long-term EQS and are considered 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a) and therefore 'not significant'. For 24-hour mean (90.41<sup>st</sup> percentile) PM<sub>10</sub> concentrations, the maximum PC is less than 10% of the relevant short-term EQS (i.e. 1.0%) and its impact can be described as 'insignificant' and therefore 'not significant'.

For short-term CO concentrations at a sensitive human receptor location, the respective PCs are less than 10% of the relevant short-term EQS and their impact is considered 'insignificant' and therefore 'not significant'. For short-term CO concentrations at a modelled off-site location, although the PC is above 10% of the relevant short-term EQS (i.e. 14.0%), the conservative approach adopted throughout this assessment means that based on professional judgement, the impact is considered 'not significant'.



For 24-hour mean (99.18<sup>th</sup> percentile) SO<sub>2</sub> concentrations at a sensitive human receptor location, the highest PC of 29.8 µg/m<sup>3</sup> is predicted at R19, which represents a residential property 70 m west-southwest of the CHP engine stack. The PC is greater than 10% of the short-term EQS (i.e. 23.8%) and greater than 20% of the headroom. However, as the PEC is well within the relevant EQS (i.e. 30.1%), based on professional judgement, the impact is considered 'not significant'.

For 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations at a sensitive human receptor location, the maximum PCs of 42.1 µg/m<sup>3</sup> and 51.5 µg/m<sup>3</sup>, respectively, are greater than 10% of the relevant short-term EQS. However, as the respective PECs are well within the relevant EQS, based on professional judgement, the impact is considered 'not significant'.

For 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations at a modelled off-site location, the maximum PECs of 3,575.6 µg/m<sup>3</sup> and 3,760.4 µg/m<sup>3</sup>, respectively, exceed the relevant EQS. As discussed previously, the elevated predicted concentrations are a result of the assessed boiler stacks being capped and their location in relation to the digester tanks which hinders pollutant dispersion. Although exceedances are predicted at an off-site location, modelled concentrations at the nearest sensitive human receptors to the site (i.e. R12 – R21) are all below the relevant EQS. Furthermore, the assessed combustion plant are unlikely to operate simultaneously during the year which means the results are likely to be higher than would reasonably be expected. Isoleths (see Figures 6 & 7) have been produced for 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> process contributions. The figures are based on the year of meteorological data which resulted in the highest PCs at a sensitive human receptor location. The isopleths shows that exceedances of the relevant EQS are only predicted in a small area of the agricultural field in close proximity to the site. Further analysis of the effects of building downwash in the model are provided in Section 5.3.

For annual mean and maximum 24-hour mean TVOC concentrations at a sensitive human receptor location, the maximum PECs of 21.3 µg/m<sup>3</sup> and 197.8 µg/m<sup>3</sup>, respectively, exceed the annual mean and daily mean EQS for benzene.

In the absence of an EQS for TVOC's, comparison of the annual mean and 24-hour mean predicted concentrations have been made against the annual mean and 24-hour mean EQS for benzene (C<sub>6</sub>H<sub>6</sub>). This represents a worst-case scenario for VOCs because it assumes all VOC contributions comprise benzene. TVOC emissions from the assessed combustion plant will largely comprise unburnt methane gas from the biogas fuel (up to 75% composition (Naskeo Environment, 2009)), which is not directly harmful to human health. If the contribution of methane (CH<sub>4</sub>) and other non-VOC pollutants were removed from the process contribution, there would be no exceedance of the relevant long-term and short-term relevant standard. Therefore, when considering the conservative approach to the assessment and based on professional judgement, the contribution of TVOC's is considered 'not significant'.

## Summary

The results in Table 8 indicate that that the predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. At sensitive human receptor locations, the predicted long-term (i.e. annual mean) NO<sub>2</sub> and particulate (PM<sub>10</sub> and PM<sub>2.5</sub>) contributions are considered 'not significant'. For short-term NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub> and CO concentrations at modelled off-site locations and sensitive human receptor locations, the contributions are also considered 'not significant'.

The maximum predicted modelled off-site concentrations exceed the environmental quality standards for 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations and 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations. The maximum predicted concentrations occur just outside the site boundary with the dispersion of pollutants likely to be impacted by the effects of building downwash. Although exceedances are predicted at an off-site location (which comprises the tree lined boundary of an agricultural field), modelled concentrations at the nearest sensitive human receptors to the site (i.e. R12 – R21) are all below the relevant EQS. Furthermore, the corresponding isopleths show that exceedances of the relevant EQS are only predicted in a small area of the agricultural field in close proximity to the site, which does not include any

PRoW's. In addition, the assessed combustion plant are unlikely to operate simultaneously during the year which means the results are likely to be considerably higher than would reasonably be expected. Furthermore, the corresponding isopleths show that.

## 5.2 Protected Conservation Areas

### 5.2.1 Assessment against Critical Levels

The environmental effects of releases from the site at the assessed protected conservation areas have been determined by comparing predicted concentrations of released substances with the EQSs for the protection of vegetation (critical levels) (see Table 3). The results of the detailed modelling at the assessed protected conservation areas are shown in Table 9. The results presented are the maximum predicted concentration at each assessed protected conservation area for the five years of meteorological data used in the study.

For SO<sub>2</sub>, the relevant EQS was based on the assumption that lichens and bryophytes were present at each assessed protected conservation area, therefore adopting a further conservative approach.

Table 9: Results of detailed assessment at assessed protected conservation sites for annual mean NO<sub>x</sub> and SO<sub>2</sub> concentrations and for maximum 24-hour mean NO<sub>x</sub> concentrations

Ref	Protected Conservation Area	EQS (µg/m <sup>3</sup> )	Background concentration (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
<b>Annual mean NO<sub>x</sub> concentrations</b>							
H1	Midland Mere and Mosses Phase 2 Ramsar	30	7.8	0.0	7.8	0.1%	25.9%
H2	Midland Mere and Mosses Phase 1 Ramsar		5.7	0.0	5.7	0.0%	19.0%
H3	Abbey Wood/New Coppice Ancient Woodland		7.2	0.1	7.3	0.5%	24.4%
H4	Rea Brook Valley Local Nature Reserve		10.5	0.0	10.6	0.2%	35.3%
H5a	River Severn (Shrewsbury to Emstrey) LWS		10.2	0.7	10.9	2.2%	36.2%
H5b			8.5	0.5	9.0	1.7%	30.0%
H5c			8.7	0.4	9.1	1.3%	30.2%
H5d			8.7	0.4	9.1	1.4%	30.3%
H5e			8.7	0.7	9.3	2.2%	31.0%
H6	Monkmoor Pool LWS		10.2	1.2	11.5	4.2%	38.2%
H7	Sundorne Canal LWS		8.4	0.3	8.7	1.0%	29.0%
H8	Sundorne Pool LWS		8.5	0.2	8.6	0.5%	28.8%
H9	Haughmond Hill LWS		7.2	0.1	7.3	0.5%	24.4%
<b>Annual mean SO<sub>2</sub> concentrations</b>							
H1	Midland Mere and Mosses Phase 2 RAMSAR	10	2.8	0.01	2.8	0.1%	28.0%
H2	Midland Mere and Mosses Phase 1 RAMSAR		2.4	0.01	2.4	0.1%	24.1%
H3	Abbey Wood/New Coppice Ancient Woodland		2.6	0.07	2.6	0.7%	26.4%
H4	Rea Brook Valley Local Nature Reserve		3.3	0.02	3.3	0.2%	33.0%
H5a	River Severn (Shrewsbury to Emstrey) LWS		4.0	0.31	4.3	3.1%	42.7%
H5b			3.0	0.23	3.2	2.3%	32.0%
H5c			2.9	0.18	3.0	1.8%	30.3%

Ref	Protected Conservation Area	EQS ( $\mu\text{g}/\text{m}^3$ )	Background concentration ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS (%)	PEC/EQS (%)	
H5d			2.9	0.20	3.0	2.0%	30.5%	
H5e			2.9	0.30	3.2	3.0%	31.5%	
H6			Monkmoor Pool LWS	4.0	0.58	4.5	5.8%	45.4%
H7			Sundorne Canal LWS	3.5	0.14	3.6	1.4%	36.2%
H8			Sundorne Pool LWS	3.0	0.07	3.0	0.7%	30.4%
H9			Haughmond Hill LWS	2.6	0.06	2.6	0.6%	26.3%
<b>Maximum 24-hour mean NO<sub>x</sub> concentrations</b>								
H1	Midland Mere and Mosses Phase 2 RAMSAR	75	15.5	0.7	16.2	0.9%	21.6%	
H2	Midland Mere and Mosses Phase 1 RAMSAR		11.4	0.4	11.8	0.5%	15.7%	
H3	Abbey Wood/New Coppice Ancient Woodland		14.4	1.7	16.0	2.2%	21.4%	
H4	Rea Brook Valley Local Nature Reserve		21.1	0.9	22.0	1.2%	29.3%	
H5a	River Severn (Shrewsbury to Emstrey) LWS		20.4	5.6	26.1	7.5%	34.7%	
H5b			17.0	4.5	21.5	6.0%	28.6%	
H5c			17.3	3.1	20.4	4.1%	27.2%	
H5d			17.3	2.8	20.2	3.8%	26.9%	
H5e			17.3	6.9	24.2	9.2%	32.2%	
H6	Monkmoor Pool LWS		20.4	10.4	30.8	13.8%	41.0%	
H7	Sundorne Canal LWS		16.8	2.8	19.6	3.7%	26.1%	
H8	Sundorne Pool LWS		17.0	1.9	18.9	2.5%	25.2%	
H9	Haughmond Hill LWS		14.4	1.6	16.0	2.2%	21.3%	

The results in Table 9 indicate that for the assessed Ramsar's, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a). For the assessed local nature reserves, the annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 100% of the long-term environmental standard and the impact can also be described as 'insignificant'.

The maximum short-term mean concentrations which were assessed against the 24-hour mean critical level for NO<sub>x</sub> (i.e. 75  $\mu\text{g}/\text{m}^3$ ) are also presented in Table 9. The results indicate that at the assessed Ramsar's, the maximum PC for short-term mean concentrations are less than 10% of the short-term environmental standard for protected conservation areas (i.e. the 24-hour mean critical level for NO<sub>x</sub>) and the impact can be described as 'insignificant'. For the assessed local nature sites, the respective short-term NO<sub>x</sub> PCs are less than 100% of the short-term environmental standard and can be described as 'insignificant'.

## Summary

This assessment assumes all assessed plant operate continuously and simultaneously at maximum load which ensures that the worst-case or maximum long-term and short-term modelled concentrations are quantified. This is a conservative assumption as, in practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, the boilers are unlikely to operate simultaneously and for more than 6,000 hours per year.

The conservative approach adopted throughout this assessment means that, based on professional judgement, it is not considered likely that there would be unacceptable impacts to air quality at the assessed protected

conservation areas as a consequence of the operation of the assessed CHP engine and boilers with regard to ambient concentrations of NO<sub>x</sub> and SO<sub>2</sub>.

### **5.2.2 Assessment against Critical Loads**

The rate of deposition of acidic compounds and nitrogen containing species have been estimated at the assessed protected conservation areas. This allows the potential for adverse effects to be evaluated by comparison with critical loads for acid and nutrient nitrogen deposition. The assessment took account of emissions of NO<sub>x</sub> and SO<sub>2</sub> only.

Critical load functions for acid deposition are specified on the basis of both nitrogen-derived acid and sulphur-derived acid. This information, including existing deposition levels at habitat sites, is available from APIS (Centre for Ecology and Hydrology, 2021). Further information on the assessment of deposition is provided in Appendix C. The full detailed modelled results are displayed in Table 10 and Table 11.

Table 10: Modelled acid deposition at assessed protected conservation areas

Ref	Habitat	Vegetation type (for deposition velocity)	Critical load (CL) (kEqH+/ha/year)			Existing acid deposition (kEqH+/ha/year)		PC	PEC	PC/CL (%)	PEC/CL(%)
			CLMaxS	CLMinN	CLMaxN	Existing deposition (N)	Existing deposition (S)				
H1	Midland Mere and Mosses Phase 2 Ramsar	Short	0.167	0.321	0.488	1.65	0.12	0.002	1.77	0.4%	363%
		Tall	2.168	0.357	2.525	2.90	0.15	0.003	3.05	0.1%	121%
H2	Midland Mere and Mosses Phase 1 Ramsar	Short	0.193	0.321	0.514	1.62	0.14	0.001	1.76	0.2%	343%
		Tall	1.362	0.357	1.719	2.80	0.17	0.002	2.97	0.1%	173%
H3	Abbey Wood/New Coppice Ancient Woodland	Tall	1.331	0.357	1.688	2.71	0.16	0.018	2.89	1.0%	171%
H4	Rea Brook Valley Local Nature Reserve	Short	0.860	0.223	1.083	1.54	0.13	0.003	1.67	0.3%	154%
		Tall	1.453	0.142	1.595	2.71	0.16	0.006	2.88	0.4%	180%
H5a	River Severn (Shrewsbury to Emstrey) LWS	Short	0.860	0.223	1.083	1.54	0.13	0.041	1.71	3.8%	158%
		Tall	1.454	0.142	1.596	2.71	0.16	0.082	2.95	5.2%	185%
H5b		Short	0.860	0.438	1.298	1.54	0.13	0.031	1.70	2.4%	131%
		Tall	1.332	0.357	1.689	2.71	0.16	0.062	2.93	3.7%	174%
H5c		Short	0.860	0.223	1.083	1.54	0.13	0.025	1.69	2.3%	156%
		Tall	1.455	0.142	1.597	2.71	0.16	0.049	2.92	3.1%	183%
H5d		Short	0.860	0.223	1.083	1.54	0.13	0.027	1.70	2.5%	157%
		Tall	1.455	0.142	1.597	2.71	0.16	0.053	2.92	3.3%	183%
H5e		Short	0.860	0.223	1.083	1.54	0.13	0.041	1.71	3.7%	158%
		Tall	1.455	0.142	1.597	2.71	0.16	0.081	2.95	5.1%	185%
H6	Monkmoor Pool LWS	Short	0.860	0.223	1.083	1.54	0.13	0.078	1.75	7.2%	161%
		Tall	1.454	0.142	1.596	2.71	0.16	0.155	3.03	9.7%	190%
H7	Sundorne Canal LWS	Short	1.610	0.438	2.048	1.54	0.13	0.019	1.69	0.9%	82%
		Tall	2.448	0.357	2.805	2.71	0.16	0.038	2.91	1.4%	104%

Ref	Habitat	Vegetation type (for deposition velocity)	Critical load (CL) (kEqH+/ha/year)			Existing acid deposition (kEqH+/ha/year)		PC	PEC	PC/CL (%)	PEC/CL(%)
			CLMaxS	CLMinN	CLMaxN	Existing deposition (N)	Existing deposition (S)				
H8	Sundorne Pool LWS	Short	0.860	0.438	1.298	1.54	0.13	0.009	1.68	0.7%	129%
		Tall	1.332	0.357	1.689	2.71	0.16	0.019	2.89	1.1%	171%
H9	Haughmond Hill LWS	Short	0.860	0.438	1.298	1.54	0.13	0.008	1.68	0.7%	129%
		Tall	1.331	0.357	1.688	2.71	0.16	0.017	2.89	1.0%	171%

Table 11: Modelled nitrogen deposition at assessed protected conservation areas

Ref	Habitat	Vegetation type (for deposition velocity)	Existing nutrient deposition (kgN/ha-year)		PC	PEC	PC/CL (%)	PEC/CL(%)
			Minimal Critical Load (CL)	Existing deposition				
H1	Midland Mere and Mosses Phase 2 Ramsar	Short	5	23.10	0.003	23.10	0.1%	462%
		Tall	10	40.60	0.006	40.61	0.1%	406%
H2	Midland Mere and Mosses Phase 1 Ramsar	Short	5	22.68	0.001	22.68	0.0%	454%
		Tall	10	39.20	0.003	39.20	0.0%	392%
H3	Abbey Wood/New Coppice Ancient Woodland	Tall	10	37.94	0.028	37.97	0.3%	380%
H4	Rea Brook Valley LNR	Short	5	21.56	0.005	21.57	0.1%	431%
		Tall	10	37.94	0.010	37.95	0.1%	380%
H5a	River Severn (Shrewsbury to Emstrey) LWS	Short	5	21.56	0.066	21.63	1.3%	433%
		Tall	10	37.94	0.132	38.07	1.3%	381%
H5b		Short	5	21.56	0.051	21.61	1.0%	432%
		Tall	10	37.94	0.102	38.04	1.0%	380%
H5c		Short	5	21.56	0.040	21.60	0.8%	432%
		Tall	10	37.94	0.080	38.02	0.8%	380%

Ref	Habitat	Vegetation type (for deposition velocity)	Existing nutrient deposition (kgN/ha-year)		PC	PEC	PC/CL (%)	PEC/CL(%)
			Minimal Critical Load (CL)	Existing deposition				
H5d		Short	5	21.56	0.043	21.60	0.9%	432%
		Tall	10	37.94	0.086	38.03	0.9%	380%
H5e		Short	5	21.56	0.066	21.63	1.3%	433%
		Tall	10	37.94	0.131	38.07	1.3%	381%
H6	Monkmoor Pool LWS	Short	5	21.56	0.126	21.69	2.5%	434%
		Tall	10	37.94	0.251	38.19	2.5%	382%
H7	Sundorne Canal LWS	Short	5	21.56	0.031	21.59	0.6%	432%
		Tall	10	37.94	0.062	38.00	0.6%	380%
H8	Sundorne Pool LWS	Short	5	21.56	0.016	21.58	0.3%	432%
		Tall	10	37.94	0.031	37.97	0.3%	380%
H9	Haughmond Hill LWS	Short	5	21.56	0.014	21.57	0.3%	431%
		Tall	10	37.94	0.027	37.97	0.3%	380%

The results in Table 10 and Table 11 indicate that for acid deposition and nutrient nitrogen deposition at the remaining assessed Ramsar's, the respective PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

For the assessed local nature sites, the respective PCs are less than 100% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

It should be noted acid and nitrogen deposition rates currently exceed their relevant critical loads in the majority of the assessed protected conservation areas. However, this is a relatively common situation at protected conservation areas across the UK due to the high baseline deposition rates.

### 5.3 Sensitivity Analysis

A sensitivity study was undertaken to see how changes to the surface roughness and omission of the buildings in the 2019 model (which predicted the highest annual mean and 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a sensitive human receptor location) and 2018 model (which predicted the highest 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a modelled off-site location) may impact on predicted concentrations at sensitive human receptors and off-site locations. The results of the sensitivity analysis are presented in Table 12, Table 13 and Table 14.

Table 12: Sensitivity analysis - fixed surface roughness of 0.1 m

Pollutant	Averaging period	Assessment location	Original PC (surface roughness 0.5 m) (µg/m <sup>3</sup> )	Surface roughness length 0.1 m				
				PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS	PEC/EQS	% difference in PC/EQS compared to original
NO <sub>2</sub>	Annual mean	Sensitive locations	5.0	5.0	13.0	12.6%	32.4%	0.2%
	1 hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	3236.1	2699.3	2715.1	1349.6%	1357.6%	-268.4%
		Sensitive locations	31.9	38.6	54.4	19.3%	27.2%	3.3%

The results in Table 12 indicate that the change to maximum predicted annual mean concentrations for NO<sub>2</sub> is negligible when using a surface roughness value of 0.1 m compared to the original value of 0.5 m. For 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at a modelled off-site location, the maximum was considerably lower when using a reduced surface roughness value of 0.1 m. At a sensitive human receptor location, the PC was slightly higher. However, a surface roughness of 0.1 m (representing root crops) is not considered representative of the site and surrounding area.



Table 13: Sensitivity analysis - fixed surface roughness of 1 m

Pollutant	Averaging period	Assessment location	Original PC (surface roughness 0.5 m) ( $\mu\text{g}/\text{m}^3$ )	Surface roughness length 1 m				
				PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS	PEC/EQS	% difference in PC/EQS compared to original
NO <sub>2</sub>	Annual mean	Sensitive locations	5.0	5.0	13.0	12.6%	32.4%	0.2%
	1 hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	3236.1	3506.1	3521.9	1753.0%	1761.0%	135.0%
		Sensitive locations	31.9	28.0	43.8	14.0%	21.9%	-2.0%

The results in Table 13 indicate that the change to maximum predicted annual mean concentrations for NO<sub>2</sub> is negligible when using a surface roughness value of 1 m compared to the original value of 0.5 m. For 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations at an off-site location, the PC is substantially higher when modelling with an increased surface roughness value of 1 m. At a sensitive human receptor location, the PC is lower. However, a surface roughness of 1 m (representing a large city centre location with built up areas and tall buildings) is not considered representative of the site and surrounding area.

Table 14: Sensitivity analysis - no buildings

Pollutant	Averaging period	Assessment location	Original PC (with buildings) ( $\mu\text{g}/\text{m}^3$ )	No buildings				
				PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS	PEC/EQS	% difference in PC/EQS compared to original
NO <sub>2</sub>	Annual mean	Sensitive locations	5.0	4.6	12.5	11.6%	31.4%	-0.8%
	1 hour mean (99.79 <sup>th</sup> percentile)	Maximum off-site	3236.1	89.9	105.8	45.0%	52.9%	-1573.1%
		Sensitive locations	31.9	30.4	46.2	15.2%	23.1%	-0.8%

The results in Table 14 indicate that the differences between the maximum predicted concentrations with and without the buildings is such that including buildings within the model is the preferred option for this study, to maintain a more realistic, and conservative, approach. The difference in modelled off-site process contribution (with the buildings removed) demonstrates the impact the nearby digester tanks have on pollutant dispersion from the assessed combustion plant.

## 6. Conclusions

This report has assessed the potential air quality impacts associated with the operation of the biogas fuelled CHP engine and boilers at the Monkmoor STW. The predicted impacts were assessed against the relevant air quality standards and guidelines for the protection of human health (referred to in the report as EQSs) and protected conservation areas (referred to as critical levels and critical loads).

### Human receptors

The assessment indicates that the predicted concentrations at sensitive human receptors do not exceed any relevant long-term or short-term air quality objective or guideline. At sensitive human receptor locations, the predicted long-term (i.e. annual mean) NO<sub>2</sub> and particulate (PM<sub>10</sub> and PM<sub>2.5</sub>) contributions are considered 'not significant'. For short-term NO<sub>2</sub>, PM<sub>10</sub>, SO<sub>2</sub> and CO concentrations at modelled off-site locations and sensitive human receptor locations, the contributions are also considered 'not significant'. For short-term TVOC concentrations, the conservative approach adopted throughout this assessment means that based on professional judgement, the contribution is also considered 'not significant'.

The maximum predicted modelled off-site concentrations exceed the environmental quality standards for 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> concentrations and 1-hour mean (99.73<sup>rd</sup> percentile) and 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> concentrations. The maximum predicted concentrations occur just outside the site boundary with the dispersion of pollutants likely to be impacted by the effects of building downwash. Although exceedances are predicted at an off-site location, which comprises the tree lined boundary of an agricultural field (as shown on Figure 5), the modelled concentrations at the nearest sensitive human receptors (which are closer than any PRow's) to the site (i.e. R12 – R21) are all below the relevant EQS. Furthermore, the corresponding isopleths show that exceedances of the relevant EQS are only predicted in a small area of the agricultural field in close proximity to the site.

In the absence of an EQS for TVOC's, comparison of the annual mean and 24-hour mean predicted concentrations have been made against the annual mean and 24-hour mean environmental quality standard for benzene (C<sub>6</sub>H<sub>6</sub>). This represents a worst-case scenario for VOCs because it assumes all VOC contributions comprise benzene. For annual mean and maximum 24-hour mean TVOC concentrations at a sensitive human receptor location, the respective PECs exceed the daily mean standard for benzene.

However, TVOC emissions from the assessed combustion plant will largely comprise unburnt methane gas from the biogas fuel (up to 75% composition (Naskeo Environment, 2009)), which is not directly harmful to human health. If the contribution of methane (CH<sub>4</sub>) is removed from the process contribution, there would be no exceedance of the short-term relevant standard. Therefore, when considering the conservative approach to the assessment and based on professional judgement, the contribution of TVOC's is considered 'not significant'.

This assessment has been carried out on the assumption that the CHP engine and boilers would operate continuously at maximum load throughout the year (i.e. 8,760 hours). This is a conservative assumption as, in practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, the boilers are unlikely to operate simultaneously and for more than 6,000 hours per year.

### Protected conservation areas

For critical levels, the results indicate that at the assessed Ramsar's, the respective annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 1% of the relevant long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as per Environment Agency guidance (Environment Agency, 2021a). For the assessed local nature sites, the annual mean NO<sub>x</sub> and SO<sub>2</sub> PCs are less than 100% of the long-term environmental standard and the impact can also be described as 'insignificant'.

For the 24-hour mean critical level for NO<sub>x</sub>, the results indicate that at the assessed Ramsar's, the maximum PC for short-term mean concentrations are less than 10% of the short-term environmental standard for protected

conservation areas (i.e. the 24-hour mean critical level for NO<sub>x</sub>) and the impact can be described as 'insignificant'. For the assessed local nature sites, the respective short-term NO<sub>x</sub> PCs are less than 100% of the short-term environmental standard and can be described as 'insignificant'

For acid deposition and nutrient nitrogen deposition, the results indicate that at the assessed Ramsar's, the respective PCs are less than 1% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a). For the assessed local nature sites, the respective PCs are less than 100% of the long-term environmental standard for protected conservation areas and the impact can be described as 'insignificant' as Environment Agency guidance (Environment Agency, 2021a).

As discussed above, the conservative approach adopted for this assessment means the predicted concentrations presented are likely to be higher than would reasonably be expected.

### **Summary**

Based on the above assessment, it is concluded that the assessed CHP engine and boilers are acceptable from an air quality perspective.

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## **8. Figures**

**Figure 1: Approximate site fenceline, modelled stack locations and modelled buildings**

**Figure 2: Extent of modelled grid and sensitive human receptor locations**

**Figure 3: Assessed protected conservation areas**

**Figure 4: Annual mean nitrogen dioxide process contributions, 2019 meteorological data**

**Figure 5: 1-hour mean (99.79<sup>th</sup> percentile) nitrogen dioxide process contributions, 2019 meteorological data**

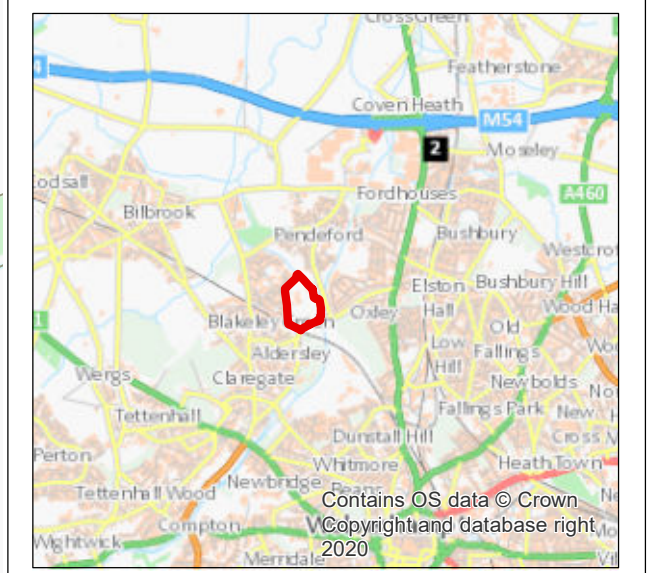
**Figure 6: 1-hour mean (99.73<sup>rd</sup> percentile) sulphur dioxide process contributions, 2019 meteorological data**

**Figure 7: 15-minute mean (99.9<sup>th</sup> percentile) sulphur dioxide process contributions, 2019 meteorological data**





- Legend**
- Approximate site fenceline
  - ⊗ Modelled stack locations
  - Modelled buildings



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ENVIRONMENTAL PERMIT APPLICATION -  
MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

APPROXIMATE SITE FENCELINE, MODELLED  
STACK LOCATIONS AND MODELLED BUILDINGS

Drawing Status

FINAL

Scale @ A3	1:2,000	DO NOT SCALE
Jacobs No.	B1958992	Rev 0

Drawing Number

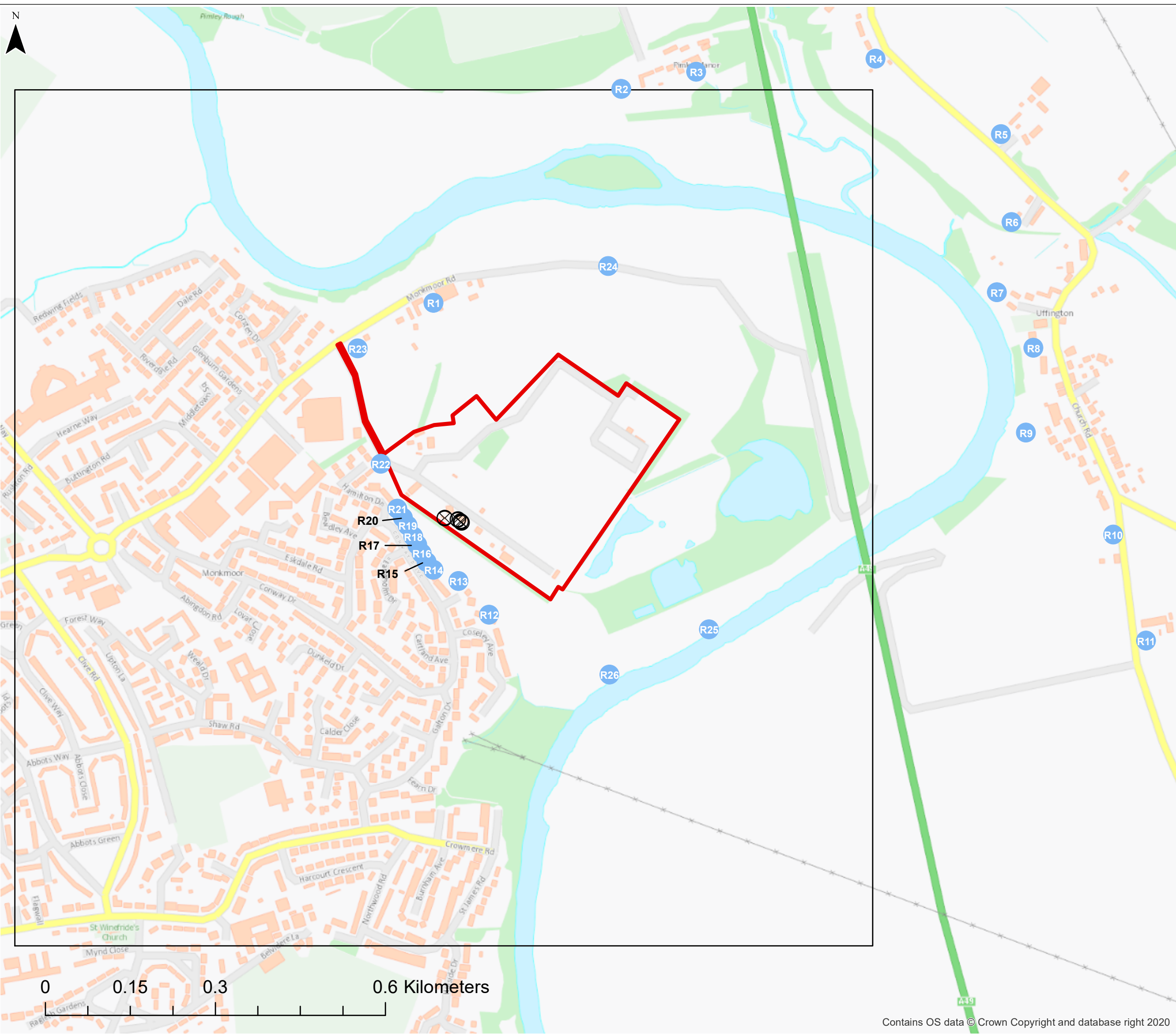
**FIGURE 1**

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0 0.05 0.1 0.2 Kilometers

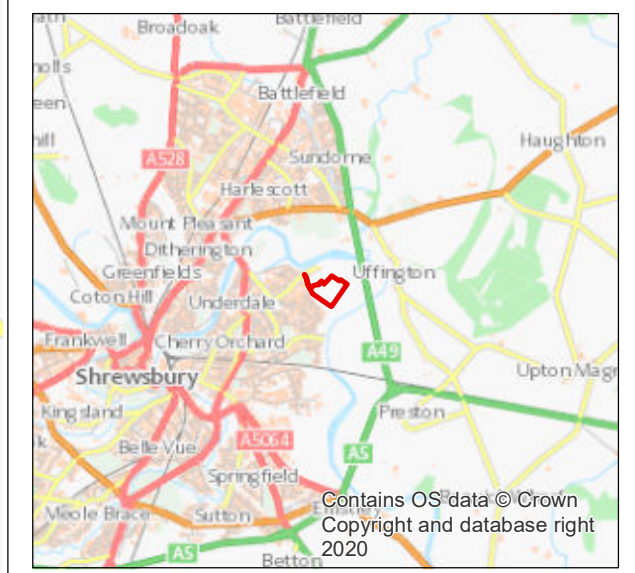
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**Legend**

- Approximate site fenceline
- Modelled stack locations
- Extent of modelled grid
- R1 Sensitive human receptor locations



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ENVIRONMENTAL PERMIT APPLICATION -  
MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

EXTENT OF MODELLED GRID AND  
SENSITIVE HUMAN RECEPTOR LOCATIONS

Drawing Status

FINAL

Scale @ A3	1:6,500	DO NOT SCALE
Jacobs No.	B1958992	Rev 0
Client No.		

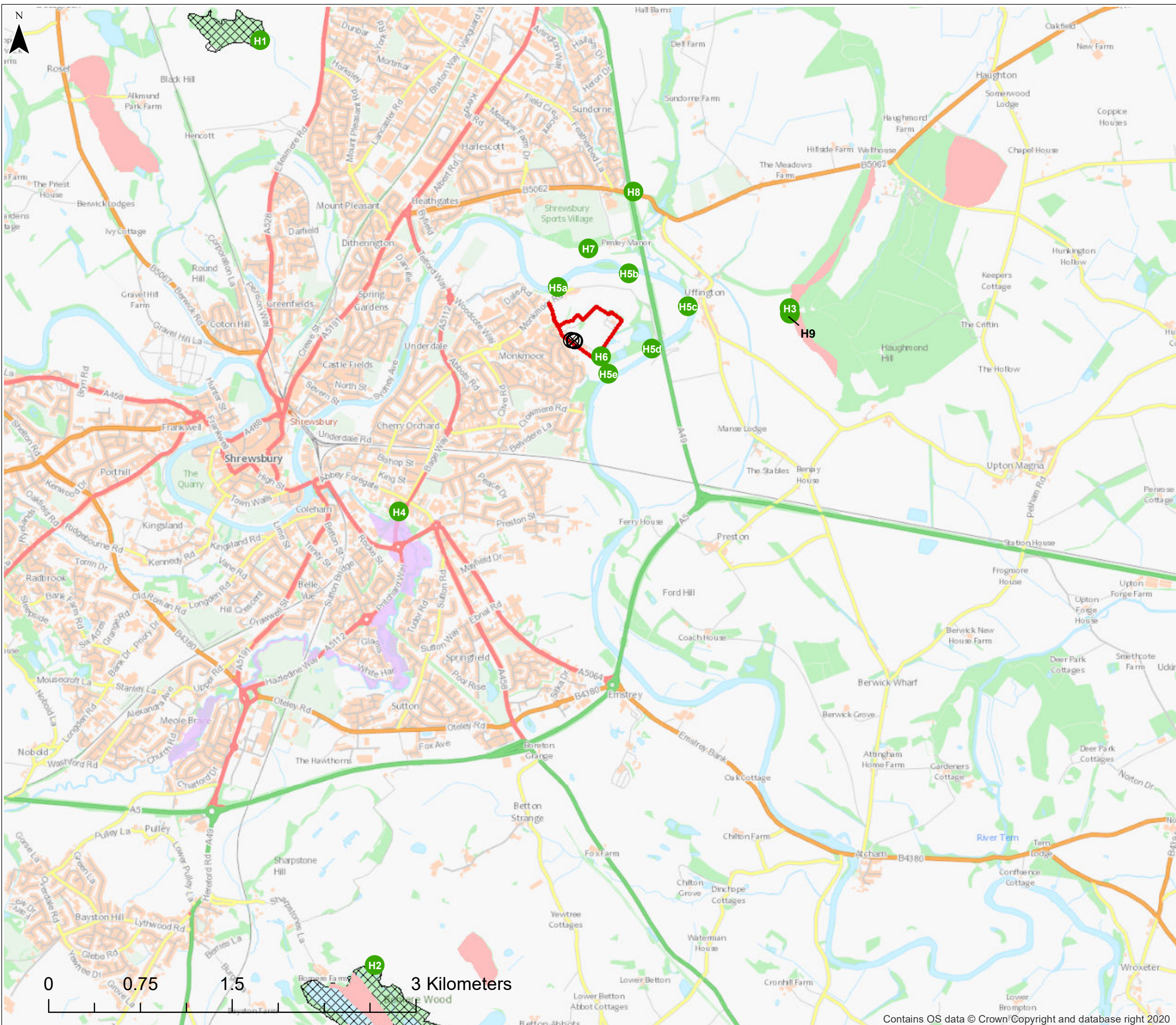
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**FIGURE 2**

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- Legend**
- Approximate site fenceline
  - ⊗ Modelled stack locations
  - ⊠ Ramsar
  - Local Nature Reserves (LNR)
  - Ancient Woodland
  - H1 Assessed protected conservation area location

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MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

ASSESSED PROTECTED CONSERVATION AREAS

Drawing Status

FINAL

Scale @ A3	1:30,000	DO NOT SCALE
Jacobs No.	B1958992	Rev 0
Client No.		

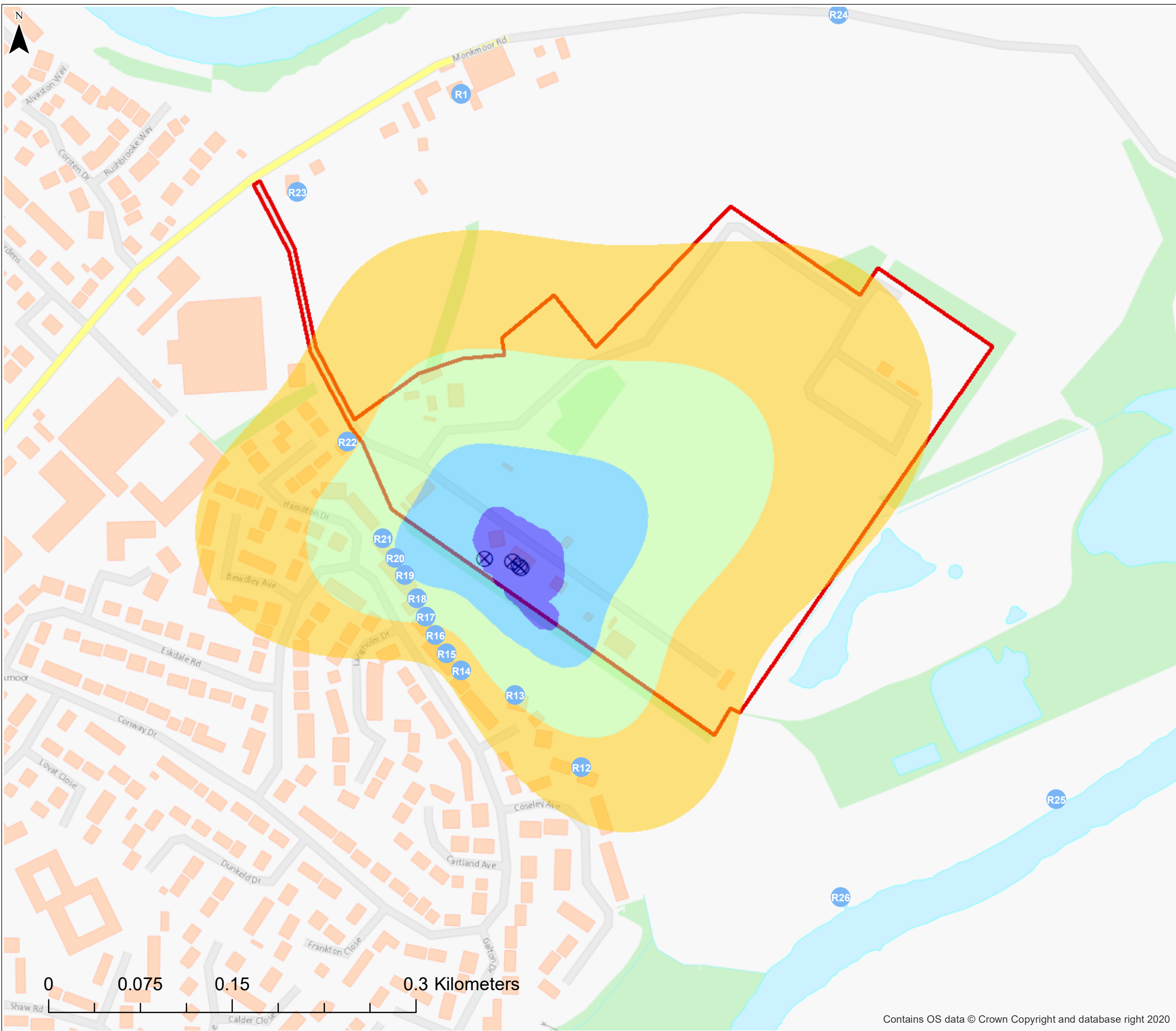
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**FIGURE 3**

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**Legend**

- Approximate site fenceline
- X Modelled stack locations
- R1 Sensitive human receptor locations

**Annual mean nitrogen dioxide process contributions ( $\mu\text{g}/\text{m}^3$ )**

- 0 - 1
- 1 - 2
- 2 - 5
- 5 - 25
- 25 - 836

0 0.075 0.15 0.3 Kilometers

0	16/12/2021	Initial Issue	DH	GW	GW	MM
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ENVIRONMENTAL PERMIT APPLICATION -  
MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

ANNUAL MEAN NITROGEN DIOXIDE PROCESS  
CONTRIBUTIONS, 2019 METEOROLOGICAL DATA

Drawing Status

FINAL

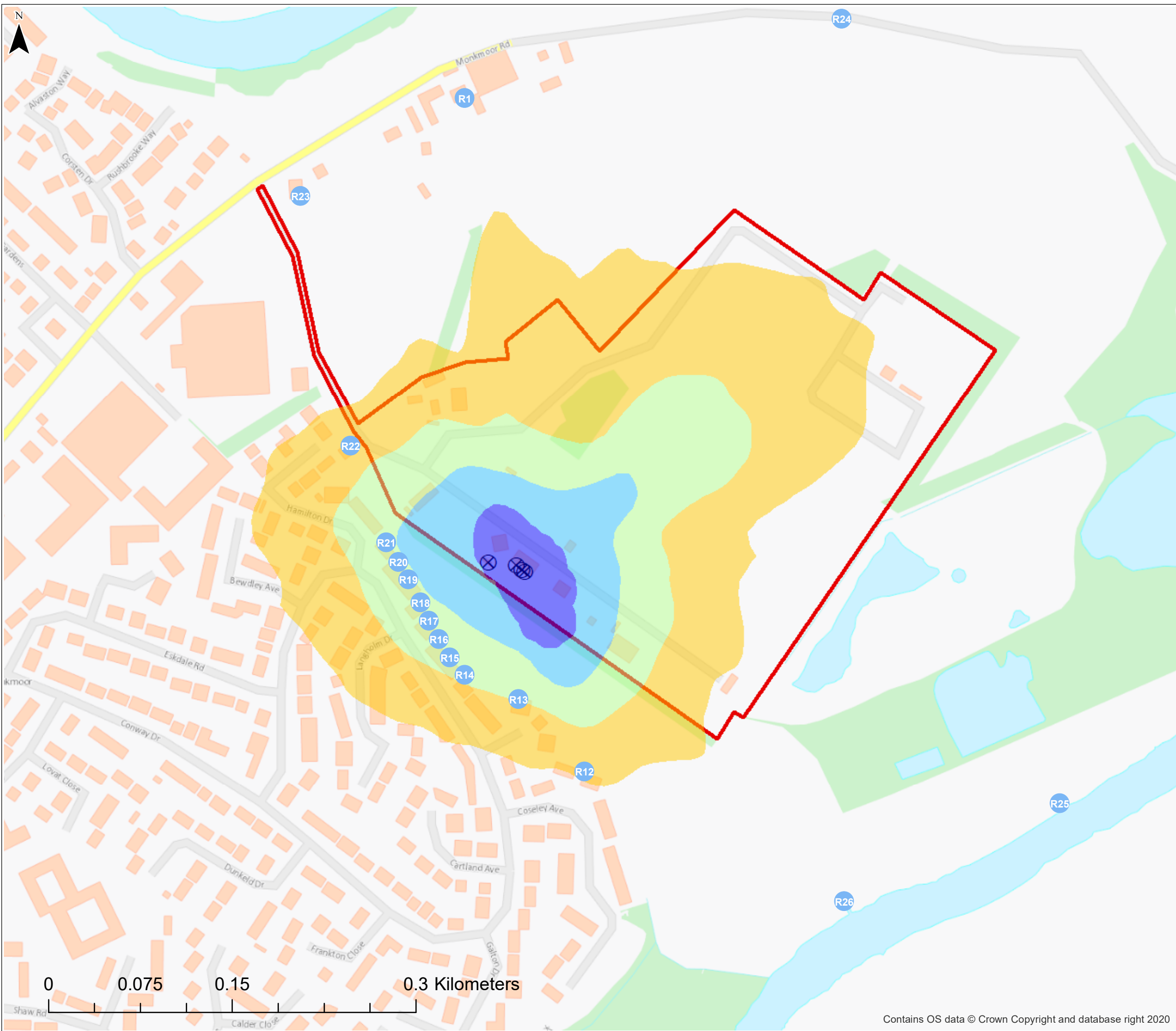
Scale @ A3	1:3,000	DO NOT SCALE
Jacobs No.	B1958992	Rev 0

Drawing Number

**FIGURE 4**

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**Legend**

- Approximate site fenceline
- Modelled stack locations
- Sensitive human receptor locations

**1-hour mean (99.79<sup>th</sup> percentile) nitrogen dioxide process contributions (µg/m<sup>3</sup>)**

- 0 - 13
- 13 - 20
- 20 - 35
- 35 - 200
- 200 - 3,608

0 0.075 0.15 0.3 Kilometers

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ENVIRONMENTAL PERMIT APPLICATION -  
MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

1-HOUR MEAN (99.79<sup>th</sup> PERCENTILE)  
NITROGEN DIOXIDE PROCESS CONTRIBUTIONS,  
2019 METEOROLOGICAL DATA

Drawing Status

FINAL

Scale @ A3	1:3,000	DO NOT SCALE
Jacobs No.	B1958992	Rev 0

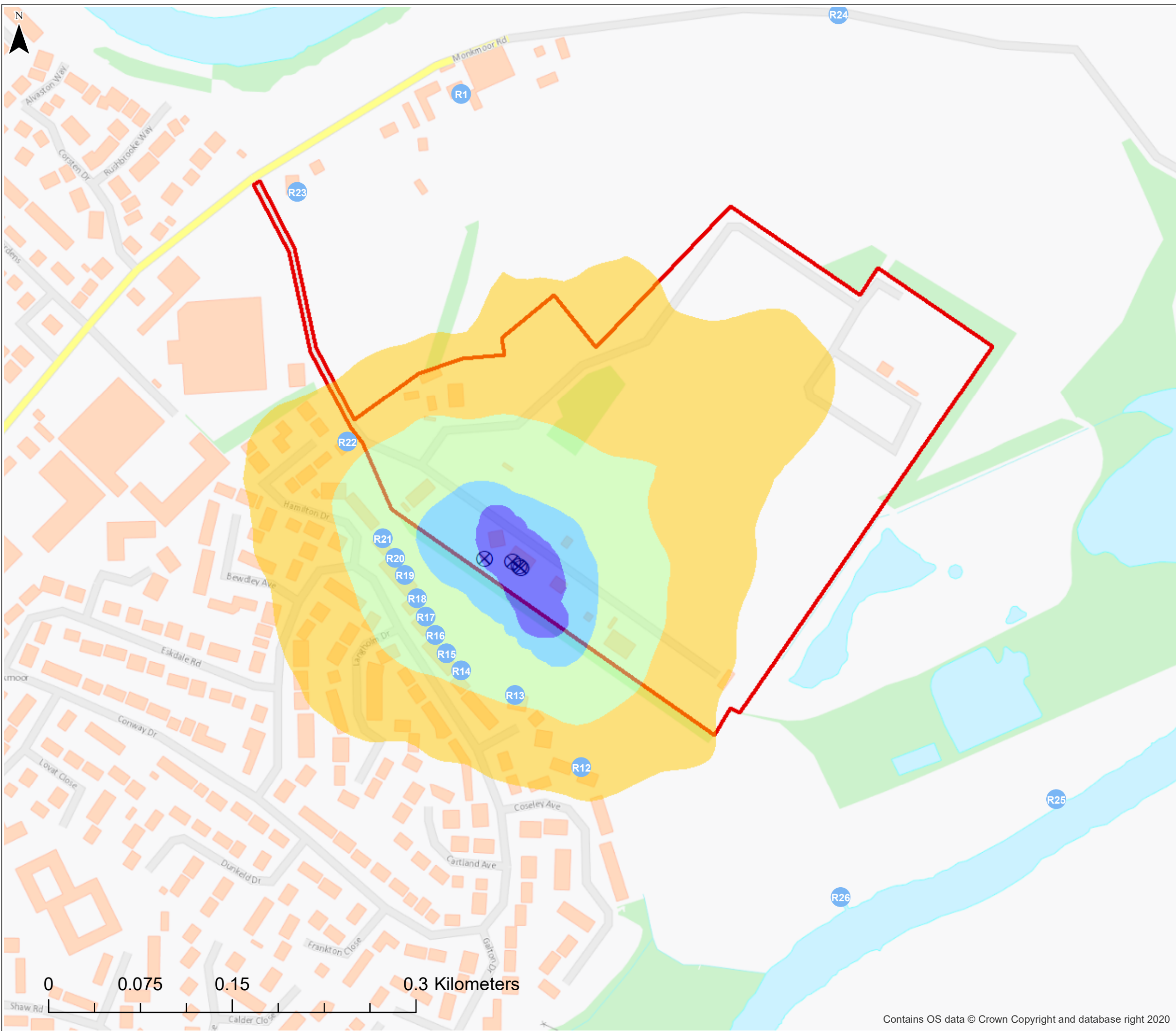
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**FIGURE 5**

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**Legend**

- Approximate site fenceline
- Modelled stack locations
- Sensitive human receptor locations

**1-hour mean (99.73<sup>rd</sup> percentile) sulphur dioxide process contributions (µg/m<sup>3</sup>)**

- 0 - 15
- 15 - 25
- 25 - 60
- 60 - 350
- 350 - 4,023

0	16/12/2021	Initial Issue	DH	GW	GW	MM
Rev.	Date	Purpose of revision	Drawn	Check'd	Rev'd	Appr'd

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ENVIRONMENTAL PERMIT APPLICATION -  
MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

1-HOUR MEAN (99.73<sup>rd</sup> PERCENTILE)  
SULPHUR DIOXIDE PROCESS CONTRIBUTIONS,  
2019 METEOROLOGICAL DATA

Drawing Status

FINAL

Scale @ A3	1:3,000	DO NOT SCALE
Jacobs No.	B1958992	Rev 0

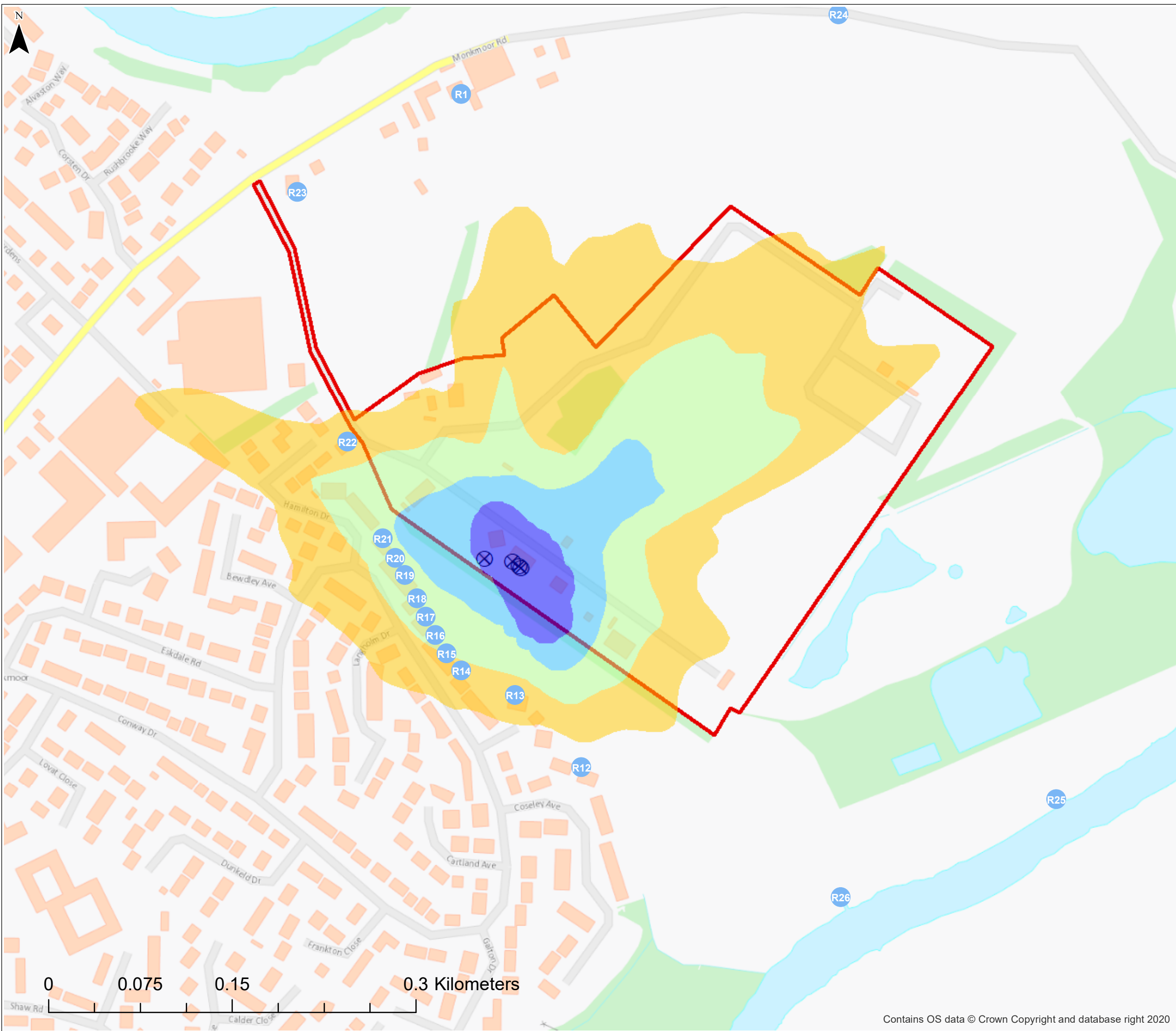
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**FIGURE 6**

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0 0.075 0.15 0.3 Kilometers

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**Legend**

- Approximate site fenceline
- Modelled stack locations
- Sensitive human receptor locations

**1-hour mean (99.73<sup>rd</sup> percentile) sulphur dioxide process contributions (µg/m<sup>3</sup>)**

- 0 - 25
- 25 - 35
- 35 - 60
- 60 - 266
- 266 - 4,092

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ENVIRONMENTAL PERMIT APPLICATION -  
MONKMOOR SEWAGE TREATMENT WORKS  
AIR QUALITY IMPACT ASSESSMENT

Drawing Title

15-MINUTE MEAN (99.9<sup>th</sup> PERCENTILE)  
SULPHUR DIOXIDE PROCESS CONTRIBUTIONS,  
2019 METEOROLOGICAL DATA

Drawing Status

FINAL

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**FIGURE 7**

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## Appendix A. Dispersion Model Input Parameters

### A.1 Emission Parameters

The emissions data used to represent the site for the scenario described in Section 2 is set out in Table A.1. Emission limits as set out in the MCPD<sup>3</sup> for existing combustion plant are also presented in Table A.1 where relevant.

Table A.1 Dispersion modelling parameters

Parameters	Unit	ENER-G 499B Biogas CHP Unit (1.3 MW <sub>th</sub> )	Boiler (0.4 MW <sub>th</sub> )	Boiler (0.4 MW <sub>th</sub> )	Boiler (0.5 MW <sub>th</sub> )
Modelled fuel	-	Biogas	Biogas	Biogas	Biogas
Emission point	-	A1	A2	A3	A4
Assessed operation hours	Hours	8,760	8,760	8,760	8,760
Stack location	m	E 351753 N 313543	E 351781 N 313537 <sup>4</sup>	E 351783 N 313536 <sup>4</sup>	E 351776 N 313541 <sup>4</sup>
Stack position	-	Vertical	Vertical (capped)	Vertical (capped)	Vertical (capped)
Stack height	m	5.14	6.00	6.00	6.00
Stack diameter	m	0.25	0.30	0.30	0.30
Effective stack diameter	m	-	2.00 <sup>2</sup>	2.00 <sup>2</sup>	2.26 <sup>2</sup>
Flue gas temperature	°C	180	150	150	
Efflux velocity	m/s	20.4	4.5	4.5	5.7
Effective efflux velocity	m/s	-	0.1 <sup>3</sup>	0.1 <sup>3</sup>	0.1 <sup>3</sup>
Moisture content of exhaust gas	%	11.4	10.0	10.0	10.0
Oxygen content of exhaust gas (dry)	%	8.4	3.0	3.0	3.0
Volumetric flow rate (actual)	m <sup>3</sup> /s	1.003	0.316	0.316	0.400
Volumetric flow rate (normal) <sup>1</sup>	Nm <sup>3</sup> /s	1.135	0.183	0.183	0.232
NO <sub>x</sub> emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	186 (190 after 1 <sup>st</sup> January 2030)	250 (250 after 1 <sup>st</sup> January 2030)	250 (250 after 1 <sup>st</sup> January 2030)	250 (250 after 1 <sup>st</sup> January 2030)
NO <sub>x</sub> emission rate	g/s	0.211	0.046	0.046	0.058
CO emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	519	100	100	100
CO emission rate	g/s	0.589	0.018	0.018	0.023
PM <sub>10</sub> / PM <sub>2.5</sub> emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	2.7	5.0	5.0	5.0
PM <sub>10</sub> / PM <sub>2.5</sub> emission rate	g/s	0.003	0.001	0.001	0.001
SO <sub>2</sub> emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	99 (60 after 1 <sup>st</sup> January 2030)	99	99	99
SO <sub>2</sub> emission rate	g/s	0.113	0.018	0.018	0.023
TVOC emission concentration <sup>1</sup>	mg/Nm <sup>3</sup>	371	1,126	1,126	1,126

Parameters	Unit	ENER-G 499B Biogas CHP Unit (1.3 MW <sub>th</sub> )	Boiler (0.4 MW <sub>th</sub> )	Boiler (0.4 MW <sub>th</sub> )	Boiler (0.5 MW <sub>th</sub> )
TVOC emission rate	g/s	0.421	0.206	0.206	0.261

Note 1: Normalised flows and concentrations presented at 273 K, 101.3 kPa, dry gas and oxygen content of 15% (CHP engine) or 3% (boilers).

Note 2: Due to the boilers stacks being capped, the effective stack diameter is based on the actual flow (m<sup>3</sup>/s) divided by the modelled stack exhaust efflux velocity of 0.1 m/s (see Note 3).

Note 3: An efflux velocity of 0.1 m/s has been applied due to the boilers stacks being capped.

Note 4: The boiler stacks are in close proximity to each other, therefore, an aai file was used in the model to represent the effects of a single plume.

## A.2 Dispersion Model Inputs

### A.2.1 Structural influences on dispersion

The main structures within the site which have been included in the model to reflect the existing site layout are identified within Table A.2. A sensitivity study has been carried out to assess the sensitivity of the model to using the buildings module.

Table A.2 Modelled building parameters

Building	Modelled building shapes	Length / diameter (m)	Width (m)	Height (m)	Angle of length to north	Centre point co-ordinates	
						Easting	Northing
Gas holder	Circular	9.00	9.00	9.60	-	351763	313558
Engine housing	Rectangular	8.30	3.30	2.90	127	351752	313544
Office	Rectangular	7.60	12.00	2.96	127	351778	313548
Boiler house	Rectangular	16.20	10.40	4.35	127	351785	313542
Digester 1 <sup>1</sup>	Circular	15.00	15.00	11.69	-	351775	313530
Digester 2	Circular	15.00	15.00	11.69	-	351790	313519
Tank	Circular	13.70	13.70	9.98	-	351805	313509

Note 1: Modelled as the main building for all considered emission points..

### A.2.2 Other Model Inputs

Table A.3: Other model inputs applied

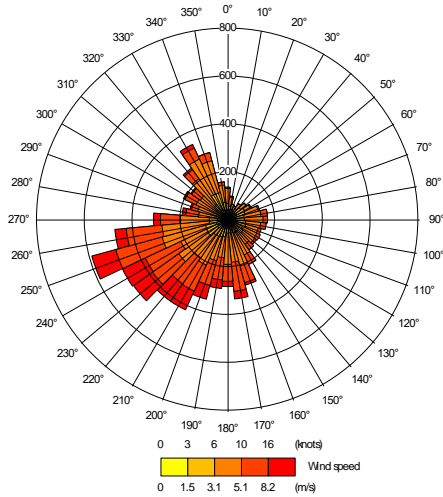
Parameter	Value used	Comments
Surface roughness length for dispersion site	0.5 m	This is appropriate for the dispersion site where the local land-use ranges from parkland to open suburbia. A sensitivity study has been carried out with fixed surface roughness values of 0.1 m and 1.0 m.
Surface roughness length at meteorological station site	0.3 m	This is appropriate for an area where the local land-is relatively flat such as at the location for the Shawbury meteorological station.
Minimum Monin-Obukhov Length	1 m	Typical values for the dispersion site
Surface Albedo	0.23 m	Typical values for the dispersion site
Priestley-Taylor Parameter	1 m	Typical values for the dispersion site
Terrain	Not included	Guidance for the use of the ADMS model suggests that terrain is normally incorporated within a modelling study when the gradient exceeds 1:10. As the gradient in the vicinity of the site does not exceed 1:10, a terrain file was not included in the modelling.
Meteorological data	Shawbury meteorological station, 2015 - 2019	Shawbury meteorological station is located approximately 9.5 km north-northeast of the site and is considered the closest most representative meteorological monitoring station to the site.
Combined flue option	Yes	As the boiler stacks are in close proximity to each other, an aai file was used in the model to represent the effects of a single plume.

### A.2.3 Meteorological Data – Wind Roses

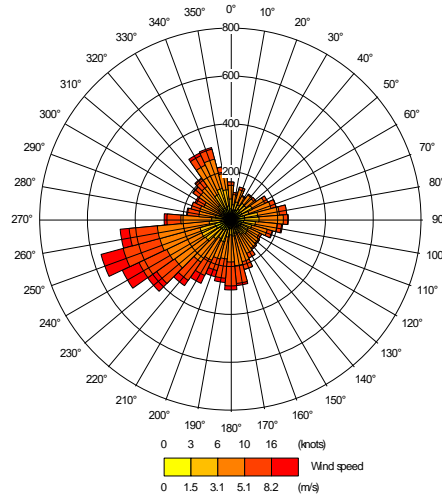
The wind roses for each year of meteorological data utilised in the assessment are shown below.



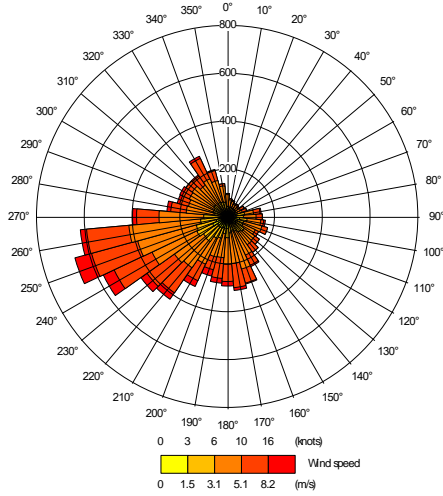
Shawbury meteorological station, 2015



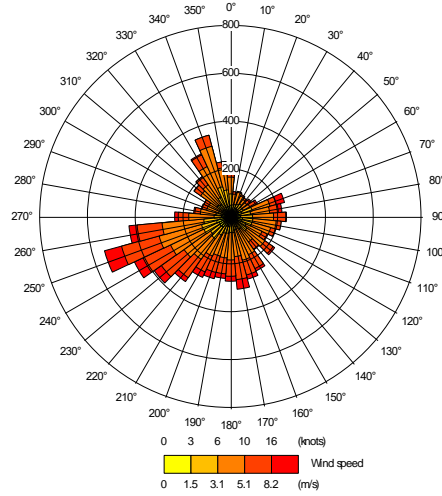
Shawbury meteorological station, 2016



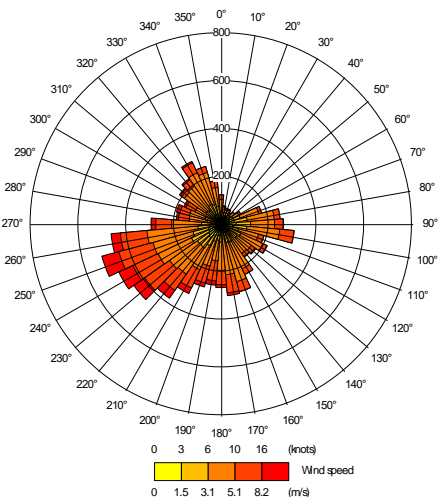
Shawbury meteorological station, 2017



Shawbury meteorological station, 2018



Shawbury meteorological station, 2019



#### A.2.4 Model Domain/Study Area

The ADMS model calculates the predicted concentrations based on a user defined grid system. Generally, the larger the study area, the greater the distance between the grid calculation points and the lower the resolution of the dispersion model predictions. This is to be offset against the need to encompass an appropriately wide area within the dispersion modelling study to capture the dispersion of the stack emissions.

The modelled grid was specified as a 1.5 km x 1.5 km grid with calculation points every 10 m (i.e. 151 points along each grid axis) with a grid height of 1.5 m. This size of grid was selected to provide a good grid resolution and also encompass a sufficient area so that the maximum predicted concentrations would be determined. The area within the site boundary was excluded from the modelled grid as it is not accessible to the general public. The modelled grid parameters are presented in Table A.4

Table A.4: Modelled grid parameters

	Start	Finish	Number of grid points	Grid spacing (m)
Easting	351003	352503	151	10
Northing	312793	314293	151	10
Grid height	1.5	1.5	1	-

As well as the modelled grid, the potential impact at 26 sensitive human receptors (e.g. exposure locations such as residential properties, a footpath and playing fields) and five protected conservation areas within the required study area were assessed. The receptor locations are shown in Figure 2 and Figure 3 and further details of the receptor locations are provided in Table A.5 and Table A.6.

Table A.5: Assessed sensitive human receptor locations

Receptor	Description	Grid reference		Distance from CHP engine stack (km)	Direction from CHP engine stack
		Easting	Northing		
R1	Residential property off Monkmoor Road	351734	313922	0.38	N
R2	Residential property off Sundorne Road	352065	314300	0.82	NNE
R3	Residential property off Sundorne Road	352197	314330	0.90	NNE
R4	Residential property off Uffington Lane	352514	314353	1.11	NE
R5	Residential property off Uffington Lane	352735	314220	1.19	NE
R6	Residential property off Uffington Lane	352754	314065	1.13	ENE
R7	Residential property off Mill Lane	352728	313941	1.05	ENE
R8	Residential property off Church Road	352792	313843	1.08	ENE
R9	Residential property off Church Road	352779	313693	1.04	E
R10	Residential property off Church Road	352933	313513	1.18	E
R11	Residential property off Church Road	352991	313326	1.26	E
R12	Residential property off Coseley Avenue	351832	313372	0.19	SSE
R13	Residential property off Allness Close	351778	313431	0.11	SSE
R14	Residential property off Conway Drive	351734	313451	0.09	SSW
R15	Residential property off Conway Drive	351722	313465	0.08	SSW
R16	Residential property off Conway Drive	351713	313480	0.07	SSW
R17	Residential property off Conway Drive	351705	313495	0.07	SW
R18	Residential property off Conway Drive	351698	313510	0.06	WSW
R19	Residential property off Conway Drive	351688	313529	0.07	WSW

Receptor	Description	Grid reference		Distance from CHP engine stack (km)	Direction from CHP engine stack
		Easting	Northing		
R20	Residential property off Conway Drive	351680	313543	0.07	W
R21	Residential property off Hamilton Drive	351670	313559	0.08	W
R22	Residential property off Hamilton Drive	351641	313638	0.15	NW
R23	Residential property off Monkmoor Road	351600	313842	0.34	NNW
R24	Public footpath	352042	313987	0.53	NNE
R25	Public footpath	352220	313346	0.51	ESE
R26	Public footpath	352044	313266	0.40	SE

Table A.6: Assessed protected conservation area locations

Receptor	Description	Grid reference		Distance from CHP engine stack (km)	Direction from CHP engine stack
		Easting	Northing		
H1	Midland Mere and Mosses Phase 2 Ramsar	349215	315991	3.53	NW
H2	Midland Mere and Mosses Phase 1 Ramsar	350150	308436	5.35	SSW
H3	Abbey Wood/New Coppice Ancient Woodland	353539	313803	1.80	E
H4	Rea Brook Valley Local Nature Reserve	350349	312140	1.98	SW
H5a	River Severn (Shrewsbury to Emstrey) LWS	351647	313974	0.44	NNW
H5b		352226	314088	0.72	NE
H5c		352709	313817	0.99	ENE
H5d		352413	313473	0.66	E
H5e		352057	313267	0.41	SE
H6	Monkmoor Pool LWS	351999	313408	0.28	ESE
H7	Sundorne Canal LWS	351896	314290	0.76	N
H8	Sundorne Pool LWS	352264	314755	1.32	NNE
H9	Haughmond Hill LWS	353543	313757	1.80	E

### A.2.5 Treatment of oxides of nitrogen

It was assumed that 70% of NO<sub>x</sub> emitted from the assessed combustion plant will be converted to NO<sub>2</sub> at ground level in the vicinity of the site, for determination of the annual mean NO<sub>2</sub> concentrations, and 35% of emitted NO<sub>x</sub> will be converted to NO<sub>2</sub> for determination of the hourly mean NO<sub>2</sub> concentrations, in line with guidance provided by the Environment Agency (Environment Agency, 2021b). This approach is likely to overestimate the annual mean NO<sub>2</sub> concentrations considerably at the most relevant assessment locations close to the site.

### A.2.6 Calculation of PECs

In the case of long-term mean concentrations, it is relatively straightforward to combine modelled process contributions with baseline air quality levels, as long-term mean concentrations due to plant emissions could be added directly to long-term mean baseline concentrations.

It is not possible to add short-period peak baseline and process concentrations directly. This is because the conditions which give rise to peak ground-level concentrations of substances emitted from an elevated source at a particular location and time are likely to be different to the conditions which give rise to peak concentrations due to emissions from other sources.

As described in the Environment Agency guidance (Environment Agency, 2021a), for most substances the short-term peak PC values are added to twice the long-term mean baseline concentration to provide a reasonable estimate of peak concentrations due to emissions from all sources.

#### **A.2.7 Modelling Uncertainty**

There are always uncertainties in dispersion models, in common with any environmental modelling study, because a dispersion model is an approximation of the complex processes which take place in the atmosphere. Some of the key factors which lead to uncertainty in atmospheric dispersion modelling are as follows:

- The quality of the model output depends on the accuracy of the input data enter the model. Where model input data are a less reliable representation of the true situation, the results are likely to be less accurate;
- The meteorological data sets used in the model are not likely to be completely representative of the meteorological conditions at the site. However, the most suitable available meteorological data was chosen for the assessment;
- Models are generally designed on the basis of data obtained for large scale point sources and may be less well validated for modelling emissions from smaller scale sources;
- The dispersion of pollutants around buildings is a complex scenario to replicate. Dispersion models can take account of the effects of buildings on dispersion; however, there will be greater uncertainty in the model results when buildings are included in the model;
- Modelling does not specifically take into account individual small-scale features such as vegetation, local terrain variations and off-site buildings. The roughness length ( $z_0$ ) selected is suitable to take general account of the typical size of these local features within the model domain; and
- To take account of these uncertainties and to ensure the predictions are more likely to be over-estimates than under-estimates, the conservative assumptions described below have been used for this assessment.

#### **A.2.8 Conservative Assumptions**

The conservative assumptions adopted in this study are summarised below.

- The CHP engine and boilers were assumed to operate at maximum load for 8,760 hours each calendar year but in practice, the CHP engine will have periods of shut-down and maintenance and may not always operate at maximum load. Furthermore, it is unlikely that the boilers will operate simultaneously or for more than 6,000 hours per year.
- The study is based on emissions being continuously at the emission limits and calculated emissions specified.
- The maximum predicted concentrations at any residential areas as well as off-site locations were considered for the assessment of short-term concentrations and the maximum predicted concentrations at any residential areas were considered for assessment of annual mean concentrations within the air quality study area. Concentrations at other locations will be less than the maximum values presented.
- The highest predicted concentrations obtained using any of the five different years of meteorological data have been used in this assessment. During a typical year the ground level concentrations are likely to be lower.
- It was assumed that 100% of the particulate matter emitted from the plant is in the PM<sub>10</sub> size fraction. The actual proportion will be less than 100%.

- It was assumed that 100% of the particulate matter emitted from the plant is in the PM<sub>2.5</sub> size fraction. The actual proportion will be less than 100%.
- It was assumed the vegetation type selected for each assessed protected conservation area is present at the specific modelled location.

## Appendix B. Biogas H<sub>2</sub>S concentration and conversion to SO<sub>2</sub>

When biogas is combusted in the assessed CHP engine and boilers, H<sub>2</sub>S is oxidised to water and sulphur oxides (SO<sub>x</sub>). The mass balance equation published in US EPA AP-42 guidance (EPA, 2021), shown below, can be used to calculate the input of sulphur on the basis of the molecular ratio between the daughter and parent species. Where SO<sub>2</sub> is the daughter species of the parent species (i.e. the sulphur containing compounds in the raw gas H<sub>2</sub>S).

Figure B-1: Biogas H<sub>2</sub>S conversion to SO<sub>2</sub> (SLR, 2010)

$$\text{Mass}_D \text{ (mg)} = \text{Mass}_P \text{ (mg)} * \text{MM} * (\text{DE}\%/100\%)$$

Mass <sub>D</sub>	is the mass of Daughter Species (mg)
Mass <sub>P</sub>	is the mass of Parent Species (mg)
MM	is the ratio of molecular mass e.g. SO <sub>2</sub> : H <sub>2</sub> S
DE%	is the destruction efficiency of the emitted gas

In order to calculate the SO<sub>2</sub> concentration in the engine emissions, the equation must consider mass flow of AD gas and a dilution factor to account for combustion air in engine emissions, hence the calculation is:

$$\text{Eng}_{\text{Emis}} \text{ Conc}_D \text{ (mg/m}^3\text{)} = \text{Conc}_P \text{ (mg/m}^3\text{)} * \text{MM} * (\text{DE}\%/100\%) / \text{DF}$$

Eng <sub>Emis</sub> Conc <sub>D</sub>	is the engine emission concentration of Daughter Species (mg/Nm <sup>3</sup> )
Conc <sub>P</sub>	is the mass of Parent Species (mg/m <sup>3</sup> )
DF	is the dilution factor (for the Jenbacher 320 of 6.9 at 50% methane)
MM	is the ratio of molecular mass (for SO <sub>2</sub> : H <sub>2</sub> S this is 1.88)
DE%	is the destruction efficiency of the emitted gas (99%)

Note: the dilution factor (DF) of 6.9 has been applied for the assessed CHP engine and boilers.

Comparison of calculated SO<sub>2</sub> concentrations against measured SO<sub>2</sub> concentrations was undertaken for the Severn Trent site at Wanlip (SLR, 2010). The greatest underprediction of calculated SO<sub>2</sub> against measured SO<sub>2</sub> concentrations was 24% and therefore this value has been incorporated into the calculation shown above as follows:

Figure B-2 - Incorporation of 24% underprediction between calculated and measured SO<sub>2</sub> concentrations

$$\text{Eng}_{\text{Emis}} \text{ Conc}_D \text{ (mg/m}^3\text{)} = \text{Conc}_P \text{ (mg/m}^3\text{)} * \text{MM} * (\text{DE}\%/100\%) / \text{DF} * 1.24$$

This provides a conservative approach to the estimation of SO<sub>2</sub> with emission rates around 1.24 times that of the average trend.

## Appendix C. Calculating Acid and Nitrogen Deposition

### C.1 Methodology

Nitrogen and acid deposition have been predicted using the methodologies presented in the Air Quality Technical Advisory Group (AQTAG) guidance note: AQTAG 06 "Technical Guidance on Detailed Modelling Approach for an Appropriate Assessment for Emissions to Air" (AQTAG, 2014).

When assessing the deposition of nitrogen, it is important to consider the different deposition properties of nitric oxide (NO) and NO<sub>2</sub>. It is generally accepted that there is no wet or dry deposition arising from NO in the atmosphere. Thus, it is normally necessary to distinguish between NO and NO<sub>2</sub> in a deposition assessment. In this case, the conservative assumption that 70% of the NO<sub>x</sub> are in the form of NO<sub>2</sub> was adopted.

Information on the existing nitrogen and acid deposition was obtained from the APIS database (Centre for Ecology and Hydrology, 2021). Information on the deposition critical loads for each habitat site was also obtained from the APIS database using the Site Relevant Critical Load function.

The annual dry deposition flux can be obtained from the modelled annual average ground level concentration via use of the formula:

Dry deposition flux ( $\mu\text{g}/\text{m}^2/\text{s}$ ) = ground level concentration ( $\mu\text{g}/\text{m}^3$ ) x deposition velocity (m/s)

(where  $\mu\text{g}$  refers to  $\mu\text{g}$  of the chemical species under consideration).

The deposition velocities for various chemical species recommended for use in the AQTAG guidance note (AQTAG, 2014) are shown below in Table C.1.

Table C.1: Recommended dry deposition velocities

Chemical species	Recommended deposition velocity (m/s)	
NO <sub>2</sub>	Grassland (short)	0.0015
	Forest (tall)	0.003
SO <sub>2</sub>	Grassland (short)	0.012
	Forest (tall)	0.024

To convert the dry deposition flux from units of  $\mu\text{g}/\text{m}^2/\text{s}$  (where  $\mu\text{g}$  refers to  $\mu\text{g}$  of the chemical species) to units of kg N/ha/yr (where kg refers to kg of nitrogen), multiply the dry deposition flux by the conversion factors shown in Table C.2. To convert dry deposition flux to acid deposition (keq/ha/yr), multiply the concentrations by the factors shown in Table C.3.

Table C.2: Dry deposition flux conversion factors for nutrient nitrogen deposition

$\mu\text{g}/\text{m}^2/\text{s}$ of species	Conversion factor to kg N/ha/yr
NO <sub>2</sub>	95.9

Table C.3: Dry deposition flux conversion factors for acidification

$\mu\text{g}/\text{m}^2/\text{s}$ of species	Conversion factor to keq/ha/yr
NO <sub>2</sub>	6.84
SO <sub>2</sub>	9.84

## **Appendix D. Results at Sensitive Human Locations**



Table D.1: Results at sensitive human receptor locations for maximum 8-hour mean and 1-hour mean CO predicted concentrations

Receptor ID	Baseline air quality level (µg/m³)	Maximum 8-hour running mean					Maximum 1-hour mean				
		EQS (µg/m³)	PC (µg/m³)	PEC (µg/m³)	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m³)	PC (µg/m³)	PEC (µg/m³)	PC/EQS (%)	PEC/EQS (%)
R1	256.0	10,000	17.8	273.8	0.2%	2.7%	30,000	39.6	295.6	0.1%	1.0%
R2	256.0		7.5	263.5	0.1%	2.6%		23.8	279.8	0.1%	0.9%
R3	256.0		7.4	263.4	0.1%	2.6%		22.0	278.0	0.1%	0.9%
R4	256.0		7.9	263.9	0.1%	2.6%		19.0	275.0	0.1%	0.9%
R5	256.0		9.0	265.0	0.1%	2.6%		17.3	273.3	0.1%	0.9%
R6	256.0		8.2	264.2	0.1%	2.6%		18.5	274.5	0.1%	0.9%
R7	256.0		8.7	264.7	0.1%	2.6%		18.8	274.8	0.1%	0.9%
R8	256.0		7.7	263.7	0.1%	2.6%		16.2	272.2	0.1%	0.9%
R9	256.0		10.3	266.3	0.1%	2.7%		18.7	274.7	0.1%	0.9%
R10	256.0		6.3	262.3	0.1%	2.6%		17.1	273.1	0.1%	0.9%
R11	256.0		5.0	261.0	0.1%	2.6%		17.4	273.4	0.1%	0.9%
R12	256.0		56.4	312.4	0.6%	3.1%		80.3	336.3	0.3%	1.1%
R13	256.0		91.2	347.2	0.9%	3.5%		115.8	371.8	0.4%	1.2%
R14	256.0		106.6	362.6	1.1%	3.6%		127.7	383.7	0.4%	1.3%
R15	256.0		129.2	385.3	1.3%	3.9%		143.9	399.9	0.5%	1.3%
R16	256.0		147.9	403.9	1.5%	4.0%		191.2	447.2	0.6%	1.5%
R17	256.0		142.7	398.7	1.4%	4.0%		177.2	433.2	0.6%	1.4%
R18	256.0		166.8	422.8	1.7%	4.2%		190.6	446.7	0.6%	1.5%
R19	256.0		171.8	427.8	1.7%	4.3%		221.0	477.0	0.7%	1.6%
R20	256.0		151.5	407.6	1.5%	4.1%		231.8	487.8	0.8%	1.6%
R21	256.0		162.2	418.2	1.6%	4.2%		247.5	503.5	0.8%	1.7%
R22	256.0		113.8	369.8	1.1%	3.7%		175.6	431.7	0.6%	1.4%
R23	256.0		21.9	277.9	0.2%	2.8%		46.2	302.2	0.2%	1.0%
R24	256.0		14.6	270.6	0.1%	2.7%		32.9	288.9	0.1%	1.0%
R25	256.0		22.7	278.7	0.2%	2.8%		57.5	313.5	0.2%	1.0%
R26	256.0		21.3	277.3	0.2%	2.8%		63.2	319.2	0.2%	1.1%

Table D.2: Results at sensitive human receptor locations for annual mean and 1-hour mean (99.79<sup>th</sup> percentile) NO<sub>2</sub> predicted concentrations

Receptor ID	Annual mean						99.79 <sup>th</sup> percentile of 1-hour mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	7.9	40	0.6	8.5	1.5%	21.3%	200	15.8	9.0	24.9	4.5%	12.4%
R2	6.7		0.2	6.9	0.5%	17.2%		13.4	5.1	18.5	2.6%	9.2%
R3	6.7		0.2	6.9	0.5%	17.2%		13.4	4.8	18.2	2.4%	9.1%
R4	6.7		0.2	6.9	0.5%	17.2%		13.4	4.0	17.4	2.0%	8.7%
R5	6.7		0.2	6.9	0.5%	17.2%		13.4	3.7	17.1	1.9%	8.6%
R6	6.7		0.2	6.9	0.6%	17.3%		13.4	4.1	17.5	2.1%	8.8%
R7	6.8		0.3	7.1	0.7%	17.7%		13.6	4.2	17.8	2.1%	8.9%
R8	6.8		0.2	7.1	0.6%	17.6%		13.6	3.1	16.7	1.6%	8.4%
R9	6.8		0.2	7.0	0.6%	17.6%		13.6	2.8	16.4	1.4%	8.2%
R10	6.8		0.1	7.0	0.3%	17.4%		13.6	2.0	15.6	1.0%	7.8%
R11	6.8		0.1	6.9	0.2%	17.3%		13.6	1.7	15.4	0.9%	7.7%
R12	7.9		1.9	9.9	4.9%	24.7%		15.8	15.0	30.9	7.5%	15.4%
R13	7.9		3.1	11.0	7.7%	27.5%		15.8	21.1	37.0	10.6%	18.5%
R14	7.9		2.3	10.2	5.7%	25.5%		15.8	22.7	38.5	11.3%	19.3%
R15	7.9		2.6	10.5	6.4%	26.2%		15.8	24.8	40.6	12.4%	20.3%
R16	7.9		2.9	10.9	7.4%	27.2%		15.8	27.0	42.9	13.5%	21.4%
R17	7.9		3.5	11.4	8.7%	28.6%		15.8	28.8	44.6	14.4%	22.3%
R18	7.9		4.2	12.1	10.4%	30.2%		15.8	30.5	46.3	15.2%	23.2%
R19	7.9		4.9	12.8	12.1%	31.9%		15.8	30.3	46.2	15.2%	23.1%
R20	7.9		5.0	12.9	12.4%	32.2%		15.8	30.8	46.6	15.4%	23.3%
R21	7.9		4.2	12.2	10.6%	30.4%		15.8	31.9	47.8	16.0%	23.9%
R22	7.9		1.9	9.8	4.6%	24.5%		15.8	18.3	34.2	9.2%	17.1%
R23	7.9		0.6	8.6	1.6%	21.4%		15.8	7.4	23.2	3.7%	11.6%
R24	6.8		0.5	7.3	1.2%	18.2%		13.6	8.0	21.7	4.0%	10.8%
R25	6.8		0.3	7.1	0.8%	17.8%		13.6	4.8	18.4	2.4%	9.2%
R26	6.8		0.5	7.3	1.2%	18.3%		13.6	7.1	20.7	3.5%	10.3%

Table D.3: Results at sensitive human receptor locations for 24-mean (99.18<sup>th</sup> percentile) and 1-hour mean (99.73<sup>rd</sup> percentile) SO<sub>2</sub> predicted concentrations

Receptor ID	99.18 <sup>th</sup> percentile of 24-hour mean						99.73 <sup>rd</sup> percentile of 1-hour mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	7.9	125	2.4	10.4	2.0%	8.3%	350	7.9	9.5	17.4	2.7%	5.0%
R2	7.9		1.0	8.9	0.8%	7.1%		7.9	5.9	13.8	1.7%	3.9%
R3	7.9		0.9	8.8	0.7%	7.0%		7.9	5.2	13.1	1.5%	3.7%
R4	7.9		0.8	8.7	0.6%	7.0%		7.9	4.6	12.5	1.3%	3.6%
R5	7.9		0.8	8.7	0.6%	7.0%		7.9	4.4	12.3	1.2%	3.5%
R6	7.9		0.9	8.8	0.7%	7.0%		7.9	4.6	12.5	1.3%	3.6%
R7	7.9		1.0	8.9	0.8%	7.1%		7.9	4.8	12.7	1.4%	3.6%
R8	7.9		1.0	8.9	0.8%	7.1%		7.9	3.7	11.6	1.1%	3.3%
R9	7.9		0.8	8.7	0.6%	7.0%		7.9	3.2	11.1	0.9%	3.2%
R10	7.9		0.5	8.5	0.4%	6.8%		7.9	2.3	10.2	0.6%	2.9%
R11	7.9		0.4	8.3	0.3%	6.6%		7.9	2.2	10.1	0.6%	2.9%
R12	7.9		10.5	18.4	8.4%	14.8%		7.9	19.0	26.9	5.4%	7.7%
R13	7.9		15.4	23.3	12.3%	18.6%		7.9	27.7	35.6	7.9%	10.2%
R14	7.9		14.3	22.2	11.4%	17.8%		7.9	30.4	38.3	8.7%	10.9%
R15	7.9		15.3	23.2	12.2%	18.6%		7.9	33.5	41.4	9.6%	11.8%
R16	7.9		18.4	26.3	14.7%	21.0%		7.9	36.6	44.5	10.5%	12.7%
R17	7.9		23.2	31.1	18.5%	24.9%		7.9	38.9	46.8	11.1%	13.4%
R18	7.9		25.0	33.0	20.0%	26.4%		7.9	41.9	49.8	12.0%	14.2%
R19	7.9		29.8	37.7	23.8%	30.1%		7.9	42.1	50.0	12.0%	14.3%
R20	7.9		25.9	33.8	20.7%	27.1%		7.9	41.2	49.1	11.8%	14.0%
R21	7.9		21.1	29.1	16.9%	23.2%		7.9	42.1	50.0	12.0%	14.3%
R22	7.9		10.7	18.6	8.5%	14.9%		7.9	24.3	32.3	7.0%	9.2%
R23	7.9		2.9	10.8	2.3%	8.6%		7.9	8.7	16.6	2.5%	4.7%
R24	7.9		1.7	9.6	1.3%	7.7%		7.9	9.1	17.0	2.6%	4.9%
R25	7.9		1.5	9.4	1.2%	7.5%		7.9	5.6	13.5	1.6%	3.9%
R26	7.9		2.6	10.5	2.1%	8.4%		7.9	8.5	16.4	2.4%	4.7%

Table D.4: Results of detailed assessment at sensitive human receptor locations for 15-minute mean (99.9<sup>th</sup> percentile) SO<sub>2</sub> predicted concentrations

Receptor ID	99.9 <sup>th</sup> percentile of 15-minute mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	7.9	266	15.5	23.4	5.8%	8.8%
R2	7.9		11.3	19.2	4.2%	7.2%
R3	7.9		10.3	18.3	3.9%	6.9%
R4	7.9		9.2	17.1	3.5%	6.4%
R5	7.9		8.8	16.7	3.3%	6.3%
R6	7.9		9.5	17.5	3.6%	6.6%
R7	7.9		10.1	18.0	3.8%	6.8%
R8	7.9		6.6	14.6	2.5%	5.5%
R9	7.9		6.9	14.8	2.6%	5.6%
R10	7.9		5.9	13.9	2.2%	5.2%
R11	7.9		4.4	12.3	1.6%	4.6%
R12	7.9		23.4	31.3	8.8%	11.8%
R13	7.9		30.9	38.8	11.6%	14.6%
R14	7.9		33.6	41.5	12.6%	15.6%
R15	7.9		44.2	52.1	16.6%	19.6%
R16	7.9		41.1	49.0	15.5%	18.4%
R17	7.9		42.6	50.5	16.0%	19.0%
R18	7.9		45.3	53.2	17.0%	20.0%
R19	7.9		45.4	53.4	17.1%	20.1%
R20	7.9		45.4	53.3	17.1%	20.1%
R21	7.9		51.5	59.4	19.4%	22.3%
R22	7.9		37.6	45.5	14.1%	17.1%
R23	7.9		13.7	21.7	5.2%	8.1%
R24	7.9		17.1	25.0	6.4%	9.4%
R25	7.9		9.6	17.6	3.6%	6.6%
R26	7.9		14.5	22.4	5.5%	8.4%

Table D.5: Results at sensitive human receptor locations for annual mean and 24-hour mean (90.41<sup>st</sup>) percentile) PM<sub>10</sub> predicted concentrations

Receptor ID	Annual mean						90.41 <sup>st</sup> percentile of 24-hour mean					
	Baseline air quality level (µg/m <sup>3</sup> )	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	11.0	40	0.01	11.0	0.04%	27.5%	50	22.0	0.05	22.0	0.1%	44.1%
R2	11.8		0.01	11.8	0.01%	29.6%		23.7	0.02	23.7	0.0%	47.4%
R3	11.8		0.01	11.8	0.01%	29.6%		23.7	0.01	23.7	0.0%	47.3%
R4	11.8		0.00	11.8	0.01%	29.6%		23.7	0.01	23.7	0.0%	47.3%
R5	11.8		0.01	11.8	0.01%	29.6%		23.7	0.01	23.7	0.0%	47.3%
R6	11.8		0.01	11.8	0.01%	29.6%		23.7	0.01	23.7	0.0%	47.3%
R7	12.7		0.01	12.7	0.02%	31.8%		25.5	0.02	25.5	0.0%	51.0%
R8	12.7		0.01	12.7	0.01%	31.8%		25.5	0.01	25.5	0.0%	51.0%
R9	12.7		0.01	12.7	0.01%	31.8%		25.5	0.01	25.5	0.0%	51.0%
R10	12.7		0.00	12.7	0.01%	31.8%		25.5	0.01	25.5	0.0%	50.9%
R11	12.7		0.00	12.7	0.01%	31.8%		25.5	0.01	25.5	0.0%	50.9%
R12	11.0		0.05	11.0	0.12%	27.6%		22.0	0.18	22.2	0.4%	44.4%
R13	11.0		0.07	11.1	0.18%	27.7%		22.0	0.28	22.3	0.6%	44.5%
R14	11.0		0.06	11.1	0.14%	27.6%		22.0	0.22	22.2	0.4%	44.4%
R15	11.0		0.06	11.1	0.16%	27.7%		22.0	0.24	22.2	0.5%	44.5%
R16	11.0		0.07	11.1	0.18%	27.7%		22.0	0.27	22.3	0.5%	44.5%
R17	11.0		0.09	11.1	0.22%	27.7%		22.0	0.37	22.4	0.7%	44.7%
R18	11.0		0.10	11.1	0.25%	27.7%		22.0	0.44	22.4	0.9%	44.9%
R19	11.0		0.12	11.1	0.29%	27.8%		22.0	0.50	22.5	1.0%	45.0%
R20	11.0		0.12	11.1	0.29%	27.8%		22.0	0.51	22.51	1.0%	45.0%
R21	11.0		0.10	11.1	0.25%	27.7%		22.0	0.39	22.4	0.8%	44.8%
R22	11.0		0.04	11.0	0.11%	27.6%		22.0	0.16	22.2	0.3%	44.3%
R23	11.0		0.02	11.0	0.04%	27.5%		22.0	0.06	22.1	0.1%	44.1%
R24	12.7		0.01	12.7	0.03%	31.9%		25.5	0.03	25.5	0.1%	51.0%
R25	12.7		0.01	12.7	0.02%	31.9%		25.5	0.02	25.5	0.0%	51.0%
R26	12.7		0.01	12.7	0.03%	31.9%		25.5	0.05	25.5	0.1%	51.0%

Table D.6: Results at sensitive human receptor locations for annual mean PM<sub>2.5</sub> predicted concentrations

Receptor ID	Annual mean					
	Baseline air quality level ( $\mu\text{g}/\text{m}^3$ )	EQS ( $\mu\text{g}/\text{m}^3$ )	PC ( $\mu\text{g}/\text{m}^3$ )	PEC ( $\mu\text{g}/\text{m}^3$ )	PC/EQS (%)	PEC/EQS (%)
R1	6.9	20	0.01	7.0	0.1%	34.8%
R2	7.1		0.01	7.1	0.0%	35.4%
R3	7.1		0.01	7.1	0.0%	35.4%
R4	7.1		0.00	7.1	0.0%	35.4%
R5	7.1		0.01	7.1	0.0%	35.4%
R6	7.1		0.01	7.1	0.0%	35.4%
R7	7.3		0.01	7.3	0.0%	36.6%
R8	7.3		0.01	7.3	0.0%	36.6%
R9	7.3		0.01	7.3	0.0%	36.6%
R10	7.3		0.00	7.3	0.0%	36.5%
R11	7.3		0.00	7.3	0.0%	36.5%
R12	6.9		0.05	7.0	0.2%	35.0%
R13	6.9		0.07	7.0	0.4%	35.1%
R14	6.9		0.06	7.0	0.3%	35.0%
R15	6.9		0.06	7.0	0.3%	35.1%
R16	6.9		0.07	7.0	0.4%	35.1%
R17	6.9		0.09	7.0	0.4%	35.2%
R18	6.9		0.10	7.0	0.5%	35.2%
R19	6.9		0.12	7.1	0.6%	35.3%
R20	6.9		0.12	7.1	0.6%	35.3%
R21	6.9		0.10	7.0	0.5%	35.2%
R22	6.9		0.04	7.0	0.2%	35.0%
R23	6.9		0.02	7.0	0.1%	34.8%
R24	7.3		0.01	7.3	0.1%	36.6%
R25	7.3		0.01	7.3	0.0%	36.6%
R26	7.3		0.01	7.3	0.1%	36.6%

Table D.7: Results at sensitive human receptor locations for annual mean and maximum 24-hour mean TVOC predicted concentrations

Receptor ID	Annual mean						100 <sup>th</sup> percentile of 24-hour mean					
	Baseline air quality level	EQS (µg/m <sup>3</sup> )	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)	EQS (µg/m <sup>3</sup> )	Baseline air quality level	PC (µg/m <sup>3</sup> )	PEC (µg/m <sup>3</sup> )	PC/EQS (%)	PEC/EQS (%)
R1	0.3	5 (Benzene)	2.7	3.0	54.4%	60.0%	30 (Benzene)	0.6	28.9	29.5	96.4%	98.3%
R2	0.3		1.0	1.3	20.6%	26.3%		0.6	12.6	13.2	42.1%	44.0%
R3	0.3		1.0	1.3	19.8%	25.4%		0.6	10.9	11.4	36.3%	38.2%
R4	0.3		0.9	1.2	19.0%	24.7%		0.6	9.5	10.0	31.5%	33.4%
R5	0.3		1.0	1.3	19.7%	25.4%		0.6	10.6	11.2	35.3%	37.2%
R6	0.3		1.1	1.4	22.8%	28.4%		0.6	9.9	10.5	33.1%	35.0%
R7	0.3		1.3	1.5	25.2%	30.8%		0.6	12.4	13.0	41.5%	43.4%
R8	0.3		1.1	1.4	22.7%	28.4%		0.6	10.6	11.1	35.2%	37.1%
R9	0.3		1.0	1.3	21.0%	26.6%		0.6	10.5	11.1	35.1%	37.0%
R10	0.3		0.6	0.9	12.5%	18.1%		0.6	5.1	5.7	17.1%	19.0%
R11	0.3		0.4	0.7	8.1%	13.7%		0.6	3.5	4.0	11.6%	13.4%
R12	0.3		9.0	9.3	180.5%	186.2%		0.6	83.3	83.8	277.6%	279.5%
R13	0.3		13.5	13.7	269.0%	274.7%		0.6	138.1	138.6	460.2%	462.1%
R14	0.3		10.6	10.9	212.2%	217.8%		0.6	132.0	132.5	439.9%	441.8%
R15	0.3		12.3	12.6	245.5%	251.1%		0.6	167.5	168.0	558.2%	560.1%
R16	0.3		14.3	14.6	286.7%	292.4%		0.6	183.6	184.2	612.1%	614.0%
R17	0.3		16.8	17.1	336.6%	342.3%		0.6	157.6	158.1	525.2%	527.1%
R18	0.3		19.0	19.3	380.6%	386.3%		0.6	171.6	172.1	571.9%	573.8%
R19	0.3		21.0	21.2	419.2%	424.9%		0.6	197.3	197.8	657.6%	659.5%
R20	0.3		21.0	21.3	419.5%	425.1%		0.6	180.7	181.3	602.3%	604.2%
R21	0.3		18.0	18.3	359.6%	365.2%		0.6	146.9	147.4	489.6%	491.5%
R22	0.3		8.1	8.3	161.3%	167.0%		0.6	80.2	80.8	267.5%	269.4%
R23	0.3		2.8	3.1	56.0%	61.6%		0.6	23.0	23.6	76.7%	78.6%
R24	0.3		2.3	2.6	45.9%	51.6%		0.6	22.2	22.7	73.9%	75.8%
R25	0.3		1.5	1.7	29.3%	34.9%		0.6	12.0	12.6	40.0%	41.9%
R26	0.3		2.3	2.5	45.1%	50.8%		0.6	23.1	23.7	77.0%	78.9%