Holloway Lane AD Facility

784-B049182

Operational Noise Management Plan

Environmental Permit Application

SUEZ Recycling and Recovery UK Ltd

February 2024

Document prepared on behalf of Tetra Tech Environment Planning Transport Limited.
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1.0 INTRODUCTION

1.1 REPORT CONTEXT

1.1.1 This Operational Noise Management Plan (ONMP) has been prepared on behalf of, SUEZ Recycling and Recovery UK Ltd (SUEZ) to support an Environmental Permit Application for an Anaerobic Digestion (AD) facility at Holloway Lane (the site), Sipson, Middlesex, UB7 0AE.

1.1.2 SUEZ are seeking to apply for an environmental permit to allow the operation of an AD facility that will process food waste from household waste collections as well as industrial and commercial customers. The process will generate biogas which will be processed by a Combined Heat and Power (CHP) engine to generate heat and electricity that would be used by the AD plant. Once the parasitic load has been met, any excess biogas will be processed by a gas upgrading plant to National Gas Grid criteria and injected into the gas grid via a gas main situated to the south of the site. Alternatively, excess biogas will be processed by the CHP engines to generate electricity that will be exported to the National Grid. The CHP engine will have a capacity of 1.2MW and therefore it's considered that the CHP engine will be subject to the Medium Combustion Plant Directive (MCPD) and therefore will comprise a MCP with a specified generator (SG).

1.1.3 The Operator also seeks to implement a wastewater treatment plant on site which will be used to treat the liquor extracted during the dewatering process of the digestate. Having been treated, the remaining liquid will be clean enough to either be used for washing down or within the process. Excess liquid will be discharged to public sewer in accordance with a trade effluent discharge consent. The treatment capacity of the wastewater treatment plant is over 50 tonnes per day, causing it to be a Schedule 1 activity.

1.1.4 All SUEZ operations are certified to ISO 14001, ISO 9001, and ISO 45001 and operate under documented management procedures. All SUEZ operations are controlled by an Integrated Management System (IMS) comprising quality, environmental and health and safety requirements.

1.1.5 An assessment of operational noise has been undertaken in the form of a 'Noise Assessment' report dated 12th January 2024. A copy of the report is provided as Appendix I of the Environmental Permit Application.

1.1.6 The report concludes that the proposed daytime predicted Rating Level from the site operations is considered to be no greater than 7 dB below background noise levels at the receptors, which is an indication of Low Impact in relation to the BS4142 criteria. This low impact is in accordance with what the Environment Agency (EA) consider a 'no noise or barely audible or detectable noise level' as it is the closest corresponding BS 4142 criteria and no further mitigation measures are required beyond basic appropriate measures or Best Available Techniques (BAT). The report concludes that the proposed daytime and night-time rating levels from the site operations are considered to be of a low impact in relation to the BS 4142 criteria. This low impact would be considered a 'no noise or barely audible or detectable noise level'.

1.1.7 The general methods of reducing and managing operational noise are presented within this ONMP. These methods are intended to control noise associated with site operations and to provide a method of communication between local residents and SUEZ, should site operations noise cause noise disturbance to local residents.

1.2 RESPONSIBILITY FOR THE IMPLEMENTATION OF THE ONMP

1.2.1 The implementation and dissemination of this ONMP will be the responsibility of the Site Manager, supported by other staff. The Site Manager can delegate certain tasks as required, although ultimate responsibility will remain with them.

1.2.2 A nominated deputy will be appointed for all times when the Site Manager is not on site. In such circumstances, it will be the nominated deputy's responsibility to ensure that the requirements of the ONMP are adhered to.

1.2.3 The ONMP is to be reviewed as a minimum on an annual frequency by the Site Manager and the Environment and Industrial Risk (EIR) Manager to ensure it reflects the latest guidance, legislation, and the site operations.

1.2.4 Staff training will be a key aspect of ensuring that noise can be controlled through effective management during daily operations. All site operatives will therefore be trained via toolbox talks to deal with noise management issues. Annual refresher toolbox talks will ensure that the requirements of the ONMP are reinforced.

1.3 SITE SETTING

1.3.1 The site is located approximately 1.2km south of the West Drayton town centre and is centred at approximate National Grid Reference (NGR) TQ 06719 78035. The site location is shown on Drawing Number SUEZ/B049182/PER/01.

1.3.2 The site forms part of a historic landfill which extends to areas further offsite to the south, east and west, and to the north of Holloway Lane.

1.3.3 The site is occupied by two tenants to operate separate waste facilities. The first facility comprises a soil recycling facility in the western section of the site. The operation of this facility will cease before operations commence for the proposed AD facility.

1.3.4 The second facility comprises a Material Recycling Facility (MRF) to the east of the site. The proposed AD facility will overlap some of the permit areas for the MRF facility including the internal haul road and an area to the north of the MRF which is currently used as a car park. Despite this, the operation of the MRF is expected to continue.

1.3.5 The immediate surroundings of the site comprise agricultural land to the east and south, Holloway Lane to the north, stormwater retention ponds, commercial stores and a garden centre to the west. In addition, there is a landfill located to the south of the site off Harmondsworth Lane. The nearest residential properties are located approximately 145m to the south of the site.

1.3.6 Access to the site is achieved by an access road to the north of the site off Holloway Lane.

1.4 IDENTIFIED NOISE RECEPTOR LOCATIONS

1.4.1 The table below summarises the sensitive receptors most likely to be impacted by noise from the site. A plan showing the location of the receptors is provided as Figure 3.1 within the Noise Assessment. .

Table 1: Residential Receptor Locations

Ref.	Description	Direction from Site	Approximate Distance from Site / Red Line (m)
R01	62a Harmondsworth Lane	SW	350
R02	Heathrow Primary School	SE	200
R03	44 Harmondsworth Lane	SW	350
R04	16 Wykeham Close	S	145
R05	366 Sipson Road	SE	235
R06	261 Sipson Road	SE	235

Ref.	Description	Direction from Site	Approximate Distance from Site / Red Line (m)
R07	Holiday Inn Hotel	NE	550

2.0 OPERATIONS

2.1 PERMITTED ACTIVITIES

2.1.1 As mentioned in Section 1.1.2, SUEZ are seeking to operate an AD facility at the site. The AD facility would provide the treatment of organic food waste (initially from municipal waste streams only, although this is likely to be expanded to include some commercial food wastes as further facilities are developed). The process will generate biogas which will be processed by a CHP engine to generate heat and electricity that would be used by the AD plant. Once the parasitic load has been met, any excess biogas will be processed by a gas upgrading plant to National Gas Grid criteria and injected into the gas grid. Alternatively, excess biogas will be processed by the CHP engines to generate electricity that will be exported to the National Grid.

2.1.2 It is considered that the AD facility will fall under following Schedule 1 activity of the Environmental Permitting (England and Wales) Regulations 2016 (as amended): -

- Section 5.4 A(1)(b)(i) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.

2.1.3 In addition, the site will operate a wastewater treatment plant which will fall under the following Schedule 1 activity

- Section 5.4 A(1)(a)(ii) – Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving physico-chemical treatment.

2.1.4 In addition to the above, the AD facility will have the following Directly Associated Activities (DAAs): -

- Storage of waste pending recovery or disposal;
- Physical treatment for the purpose of recovery;
- Heat and electricity power supply (i.e. CHP);
- Emergency flare operation;
- Gas upgrading;
- Raw material storage;
- Gas storage; and
- Digestate storage

2.1.5 Details of the process description are provided in Section 2.3 of this document.

2.2 WASTE QUANTITIES

2.2.1 It is proposed that the AD Facility will be designed to treat up to 100,000 tonnes of food waste per annum.

2.3 PROCESS DESCRIPTION

2.3.1 The AD facility can be separated into several general areas: reception, separation, anaerobic digestion, liquor treatment, biogas handling (including electricity generation), odour control and carbon capture.

Reception

2.3.2 Delivery vehicles would reverse into the reception hall via a fast-acting door. Once the door is closed, the driver would deposit the waste into a waste pit that is situated within the reception hall. The pit will be designed to push the waste into the pre-treatment area. This will ensure that waste is processed in the order it is received (first-in, first-out) and therefore ensure that the waste is not stored for more than 72 hours which will be the maximum residency time that waste will be stored in the reception hall prior to treatment.

Separation

2.3.3 Waste will be fed into a de-packaging plant which is situated within the main AD process building. The plant will be designed to remove unwanted packaging and contamination (e.g., stones, glass, seeds, pips and bones). Any packaging and contaminants recovered from the plant will be discharged into skips/RoRos where they will be transferred to an appropriate permitted facility for further treatment. It's envisaged that up to 162.5 tonnes of packaging and contaminants will be stored on site prior to transfer and will be stored for no longer than 7 days.

2.3.4 The waste will also be diluted with recovered water from the process, towns water and liquid waste from the food industry in order to achieve the required dry soils concentration to feed into the digestion process.

Anaerobic Digestion

2.3.5 The residual organic waste will be pumped into the hydrolysis buffer tank(s) located to the north of the main AD process building. The tank acts as a buffer between the intermittently working reception and processing halls and the continuously operating AD plant, as well as providing residence time for the enzymatic hydrolysis of fats and proteins.

2.3.6 Slurry is then pumped from the hydrolysis buffer tank to the anaerobic digesters. Three 7,800m^3 AD tanks would convert organic material to biogas (methane and carbon dioxide) by the fermentation of organic material in the absence of oxygen. The retention time of the digester is up to 60 days to maximise the biogas production and biogas is collected within the roof space, which is connected to the biogas system.

2.3.7 As part of the process, SUEZ intend to install pasteuriser tanks which may be used to heat the slurry to 70°C before it is pumped into the aerobics digesters. Alternatively, the pasteuriser tanks may be incorporated at a later stage of the AD process where it will be used to heat the material 'digestate' to 70°C for a minimum 1 hour before being pumped into the post digestion buffer tank.

2.3.8 The material left from the process (digestate) will still be in slurry form and can be used as a fertiliser, compost, or soil improver. To achieve this, the digestate will be subject to the specifications outlined in PAS 110 'Specification for whole digestate, separated liquor and separated fibre derived from the anaerobic digestion of source-segregated biodegradable materials.'

2.3.9 At this stage, SUEZ are considering the potential options to process the digestate. The main process is to process the digestate slurry through a centrifuge where solids are dewatered to a dry solid concentration of approximately 25%. The centrifuges will be located within the main AD process building. Digested material falls by gravity into articulated trailers where it can be periodically collected and subsequently transferred off site. The trailers will have a total storage capacity of 50 tonnes. Under normal operating conditions, the maximum residence time for the digestate will be no longer than 24 hours before it is transferred off site.

2.3.10 The facility would provide approximately 19,000 tonnes of digested cake per annum which would be spread to agricultural land as a soil enhancer.

2.3.11 In the event that the digestate does not meet the required specifications, the material will be stored within designated RoRos/skips inside the AD building and disposed of accordingly.

2.3.12 Alternatively, SUEZ are considering the potential to export the digestate in a slurry form and therefore would not be processed by the centrifuge. In addition, there wouldn't be a requirement to process any liquor through the wastewater treatment plant.

Liquor Treatment

2.3.13 Liquor extracted during the dewatering process (as detailed in Section 2.3.9), would gravitate to the liquor pumping sump from where it would be transported to the wastewater treatment plant on site. The treatment process will reduce the Chemical Oxygen Demand, oxidise ammonia to nitrate and correct pH. Waste sludge from this process will be used to dilute the food waste entering the plant. The remaining liquid is clean enough to either be used for washing down or within the process. Excess liquid will be discharged to sewer.

Biogas Handling

2.3.14 The biogas is captured from the AD tanks and then will be processed by the CHP engine to generate heat and electricity that would be used by the AD plant. Once the parasitic load has been met, any excess biogas will be processed by a gas upgrading plant to National Gas Grid criteria and injected into the gas grid. Alternatively, excess biogas will be processed by the CHP engines to generate electricity that will be exported to the National Grid.

Carbon Capture

2.3.15 The biogas produced from the AD facility will be piped to a gas upgrading system to remove hydrogen sulphide (H_2S) and separate CO_2 from the bio-methane. After the biogas has been cleaned into biomethane its envisaged that the remaining gas will contain about more than 99% of CO_2. The carbon capture process will liquefy the CO_2 while recovering the residual bio-methane (<1%) which can be returned to the biogas upgrading unit.

2.3.16 The CO_2 capture process comprises: -

- Gas compression unit;
- CO_2 filtration and drying unit;
- CO_2 liquefaction module; and,
- Storage tanks.

2.3.17 The carbon capture mechanism on-site operates as a closed system, the full details are provided as Section 4.6 of the BATOT document (Appendix C of this Environmental Permit Application).

Odour Control

2.3.18 Processes will be fully enclosed with an odour abatement system comprising the following:

- The air within the building shall be treated by incorporating a local extract ventilation system above and around the reception pit and other point sources of odour within the building at a rate of 3 air changes per hour. All the collected air shall pass through a dust filter then deep beds of activated carbon, designed with sufficient contact time to prevent the release of odorous air. The inclusion of a dust filter enhances the effectiveness of the activated carbon.
- Air from some of the process equipment (e.g. buffer tanks, pasteurisation and storage tanks) shall also be collected and pass through an enclosed biofilter, then the dust filter and activated carbon filter. The treated air from the carbon filters will be discharged to atmosphere via an elevated vent stack.

2.4 NOISE GENERATING EQUIPMENT

2.4.1 The items contained within Table 3 below are identified as being the most significant sources of noise. An overview of the 'embedded' mitigation that is associated with the identified plant is highlighted within Table 3.

Table 2: Noise Generating Equipment and Mitigation Overview

Plant Item	Mitigation
HGV Movements and Unloading	HGV's arriving on-site will be asked to switch off engines whilst idle. Site access roads and service yards will be maintained and kept free of potholes and other deformities. Measures will be taken to reduce impulsive noise associated with deliveries, through maintenance and training. Transport to and from site will be restricted to the hours –provided within Section 2.5.
Staff Car Park	Training will be provided to staff about being considerate neighbours and considering noise impacts of their actions such as slamming doors or shouting.
Machinery	Regular maintenance of equipment and training on correct use will be provided. AD facility is a fully enclosed process thus noise emissions from the operational activity is significantly reduced. Plant on site is fitted with "white noise" reversing beacons which minimise the intrusive nature of the safety measure. All equipment and vehicles when not in regular use shall be switched off.

2.5 OPERATING HOURS

2.5.1 The facility will operate 24 hours a day, but vehicle movements to and from the site will be restricted to the following hours: -

- 07:00 –19:00 – Monday - Sunday.

3.0 NOISE MANAGEMENT

3.1 GENERAL BEST PRACTICE AND SITE MANAGEMENT

3.1.1 Site staff will ensure that the delivery and loading of waste takes place in a controlled manner so that noise generation is kept to a minimum. All activities on site will take place in accordance with the conditions of the planning permission. Such measures include:

HGV Movements and Deliveries

- All vehicle movements to and from the site will be restricted to the hours detailed in Section 2.5.
- Internal roads and service yard to be maintained to avoid noise from trucks hitting from potholes, ruts etc;
- Engines to be switched off when vehicle is waiting or not in use;
- Manoeuvring should be minimised as far as practicable to avoid unnecessary revving of engines; and,
- No use of vehicle horns unless as an emergency health and safety requirement.

On-site Movement of Materials

- All waste will be handled indoors.
- All waste is deposited into the waste pit which minimised double handling.
- No unnecessary shouting in the external yard area;
- Mobile plant operators should seek to minimise drop heights and excessive banging of materials when loading/unloading; and,
- No use of vehicle horns unless as an emergency health and safety requirement.

Fixed Plant

- Regular inspection of plant will be undertaken;
- Ensuring that regularly maintained and appropriately silenced equipment is used;
- In terms of on-site employees, appropriate actions will take place with regard to the Noise at Work Regulations including the requirement for the use of ear defenders and appropriate warning notices.

3.1.2 In addition to the above, the following measures will be implemented:

- Regular maintenance of all equipment which as a minimum are in-line with manufactures recommendations;
- Qualitative and quantitative monitoring of noise levels generated by the site operations will be carried out on a weekly basis by site staff and be recorded on the weekly checklist; and,
- Should noise issues with any on-site plant be identified, immediate steps will be taken to take the plant out of circulation (where possible) and repairs will be actioned as soon as possible to remedy the problem.

3.2 NOISE CHECKS

3.2.1 Site management do not solely rely on the specific daily noise checks only, as noise levels generated by the operation will be assessed on a continuous qualitative basis by the site staff present on site and any noise identified outside the regular inspections are reported to site management for investigation.

3.2.2 The Site Manager, or designated person will be responsible for ensuring that daily checks are made around the site and its perimeter in order to identify any unusual or unexpected sources of noise and to establish whether any unusual noise is discernible at the perimeter of the site. The noise checks undertaken as part of the daily inspections will be recorded on the daily and weekly IMS checklist or Vision App detailed in Appendix B

3.2.3 Any abnormal noise identified must be clearly marked on the IMS checklist or Vision App. Should noise be identified during a routine noise assessment, which, based on its characteristics and the prevailing meteorological conditions, may originate from the facility, then an immediate investigation into the source of the noise will be undertaken. Such an investigation would also be undertaken in response to any complaints that may be received.

3.2.4 Immediately upon detection of any abnormal noise, or receipt of any noise complaint, the following checks will be made: -

- Physical check on mobile plant;
- Physical check on fixed plant; and,
- Qualitative noise checks either near to the source or at the boundary of the site which can be compared with previous observations to help determine changes to the noise level.

3.2.5 If any anomalies to normal site settings are observed, immediate remedial action will be taken, and anomalies and corrective action recorded in the site diary.

3.2.6 Depending on the abnormal noise identified and anticipated time of resolution, the Site Manager will determine if operations are to cease or continue until the issue has been resolved.

3.2.7 In the event that future monitoring of operational noise is required, it is likely that potential noise impacts on receptors will need to be considered and monitoring locations representative of residential receptors listed in Table 1 will need to be identified.

3.3 TRAINING AND ONGOING MANAGEMENT

3.3.1 Staff on site (including the Site Manager) will be provided with training and instruction in all aspects of the respective job role and responsibilities, this includes full training on any plant and fixed equipment they will operate.

3.3.2 For fixed plant this will comprise of the following as a minimum: -

- The hazards/risks of the equipment, including a consideration of site-specific factors;
- The safe operation of the equipment and associated operations;
- The use of safety components;
- Lock-off procedures/procedures for cleaning, clearing blockages and maintenance;
- The safe resetting of the equipment following activation of emergency stops; and,
- Equipment specific maintenance requirements.

3.3.3 Regular checks will be undertaken by the Site Manager to ensure that the plant is fully functional, operating as normal and that there are no irregularities within the noise emitted from the plant. The Site Manager will generally be the Technical Competent Person for the site and will have the relevant training regarding the operation of this type of waste management site.

3.3.4 As part of the staff training, site personnel will be advised of the following aspects, particularly in relation to noise: -

- The proper use and maintenance of plant and equipment to minimise noise;
- Control of Noise at Work – Occupational Noise Hazards;
- Management of environmental noise; and,
- Avoidance of unnecessary noise when carrying out manual operations and when operating plant and equipment.

3.3.5 Site staff will be trained on site on the above topics. The training provided will promote the importance of being aware of and controlling both occupational and environmental noise.

3.3.6 Staff and management training records will be kept and can be made available to the Local Planning Authority on reasonable request.

3.4 MAINTENANCE

3.4.1 In terms of in-house maintenance, the site will utilise Planned Preventive Maintenance (PPMs) as per the manufacturer's Operation and Maintenance Manual. Corrective actions can also be raised for potential anomalies that are identified. Only personnel who are trained and licensed to operate equipment and carry out maintenance will do so.

3.4.2 All plant and equipment will be maintained in accordance with a Preventative Maintenance Program (PMP) which will be defined by the manufacturer's requirements. This will ensure that the integrity and operational efficiency of all plant and equipment is maintained and therefore minimise the risk of mechanical failure which may result in increased noise emissions.

3.4.3 In accordance with the site's IMS, all plant and equipment will be inspected on a daily basis by a nominated manager prior to use. The purpose of this inspection is to identify any signs of defects that may affect the integrity and operational efficiency of the plant.

3.4.4 In the event that a defect is identified on any item of plant or equipment, the use of the plant/equipment will be suspended until the necessary remedial works have been undertaken. In order to facilitate this, mobile plant will be isolated, and the Site Diary will be updated to outline the operational conditions and availability of all plant and equipment.

3.4.5 Once the necessary remedial works have been done, the Site Diary will be updated to provide details of the defects and remedial actions.

3.4.6 Management staff will undertake monthly checks, to ensure all equipment is operating efficiently and without excessive noise. Any defects or damage will be reported to the Site Manager and remedied in reasonable time.

4.0 REPORTING AND COMPLAINTS PROCEDURE

4.1 INVESTIGATION AND RECORDS

4.1.1 Any noise complaints received at the facility or via the regulatory bodies, including the EA and Local Authority will be logged as soon as practicably possible. Where possible, as much information and detail about the complaint will be recorded, whether this is from the relevant authority or complaint direct to site. This information will assist in the investigation and determining the source of the noise. All responses will be through trained and experienced staff.

4.1.2 Complaints management will be undertaken in line with the amenity complaints procedure provided in the IMS. The first stage of complaints investigations is to complete a basic screening exercise to determine if the site is the likely cause and if further, more detailed investigations are required. Once determined that further investigations are needed an off-site and on-site noise investigations are carried out using the Amenity Complaint Investigation form. A copy of the form is provided as Appendix C.

4.1.3 Complaints investigations are to be carried out by site management and the EIR Manager that are not regularly exposed to the noise and therefore are able to assess the level of noise objectively.

4.1.4 Should the complaint be received out of operational hours then site management shall try to attend site as soon as possible to carry out an investigation dependent upon availability.

4.1.5 Where necessary, the EA shall be informed of the investigation findings so they can relay this back to the complainant.

4.1.6 SUEZ will ensure that the complainant has all the relevant contact details of the site (i.e., the Site Manager), the EA's contact details. SUEZ will be in regular contact with the complainant and the EA whilst the cause of the noise is being investigated and remediated.

4.1.7 Site management and the EIR Manager will review all procedures for the facility against other SUEZ operations and management procedures as well as industry practice, guidance, and legislation to ensure continued best practice is carried out at the facility. If required, the Operating Techniques and ONMP shall be updated to reflect any changes made to the management procedures on site following the review.

4.1.8 An evaluation of the effectiveness of the techniques used will be carried out on completion of any remedial measures and records of the above will be retained by site for future reference.

4.2 NON-CONFORMANCES AND COMPLAINTS

4.2.1 The investigation will determine the source of the complaint and then the cause of the noise.

4.2.2 Each complaint will be reviewed and assessed. If the site is identified as the source of the potential noise nuisance, an assessment shall be carried out in order to determine the source of the complaint and then the cause of the noise.

4.2.3 If the noise can be directly related to the site, corrective actions will be identified and programmed for remediation. Actions taken in response to any noise complaint will be recorded on a noise investigation form.

4.2.4 Corrective action procedures are documented in the IMS procedure titled 'Non-conformance, Corrective and Preventive Actions'. A list of all policies and procedures is included in the site specific management system.

4.2.5 If remediation cannot be completed within 24 hours then the non-conformance and remedial actions shall be raised on the SUEZ Compliance and Audit System (COMPAS).

4.3 COMMUNITY ENGAGEMENT

4.3.1 Should noise be identified from external sources which are thought may have been related to complaints received or likely to cause complaints then the site would consider contacting those responsible for the noise, if possible, to establish communication in relation to those activities.

4.3.2 Should extensive work be required on site which may lead to potential noise complaints then the site may consider providing advance warning to residents, dependent upon the likely duration and estimated impact of such works. The EA would be contacted prior to issuing any such notice.

4.3.3 Initially, SUEZ plan to undertake ongoing community engagement, however this would be reviewed in light of any complaint received at the facility.

DRAWINGS

Permit Boundary Plan - SUEZ/B049182/PER/01

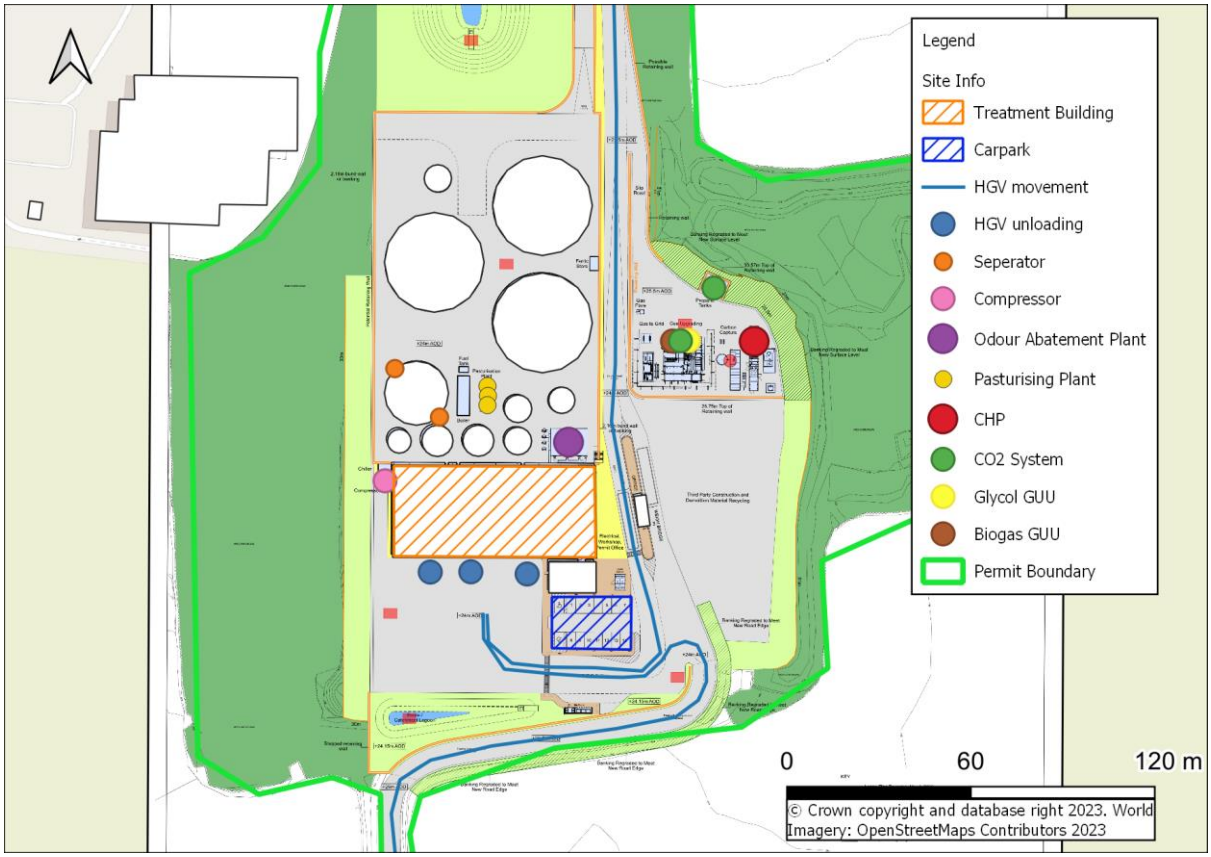
Receptor Plan - SUEZ/B049182/REC/01

Proposed Site Layout - 1451_PL100

APPENDICES

APPENDIX A – SITE LAYOUT WITH NOISE SOURCES

Position of Breakout & Noise Generating Equipment (including deliveries)



APPENDIX B – INDICATIVE DAILY/WEEKLY INSPECTION CHECKLIST

APPENDIX C – AMENITY COMPLAINT INVESTIGATION FORM