

Technical Note

H1 Screening Assessment – Howdon Biomethane Upgrade Plant Air Quality and Screening Assessment

Environment EPR/KP3394ZE/V006 **Date:** 19 December 2022

Agency reference:

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1 Introduction

As requested in the 'Application: EPR/KP3394ZE/V006 - Northumbrian Water Ltd - Howdon STW - Request for further information clarification, dated 24 November 2022' an air emissions risk assessment of emissions to air of relevant substances from the biomethane upgrade plant (BUP) has been conducted using the Environment agency's H1 Risk Assessment Tool.

The screening assessment has been carried out for the emission point at the BUP. This technical note summarises the findings of the assessment, as well as outlining the information which has been inputted into the H1 tool and how these values have been derived.

The purpose of the BUP is to remove carbon dioxide (CO₂) to produce biomethane in line with the Quality Protocol specification. Prior to the biogas passing to the BUP it will pass through a filtering system which will remove contaminants such as hydrogen sulphide, and mercaptans.

To complete the assessment, the guidance 'Air emissions risk assessment for your environmental permit' has been used. As stated in guidance, where existing data has not been available, either estimates based on similar operations elsewhere or worst-case estimates have been used to complete the assessment. All assumptions that have been made for these estimates are detailed in this report.

2 BUP stack parameters

2.1 Overview

Table 2.1 provides the parameters of the BUP that were used to undertake the screening assessment. All of the parameters, with the exception of the effective stack height which was calculated using the method detailed in Section 2.2 below, were provided by Northumbrian Water Limited (NWL). The emission point reference identifies where the emission point is located, and corresponds to the Site layout plan in Appendix A.

¹ https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit



Table 2.1: BUP stack parameters

| Location | X 433563.37 Y 566268.81 |
|---|--|
| Stack height | 12m |
| Height of tallest building within 5L (m) ^a | 15m |
| Effective stack height | 0m |
| Maximum Biogas flow rate to the BUP | 1900 Nm³/h ^b |
| Maximum CO₂ off-gas rate (with trace contaminates) | 733.4Nm³/h ^b |
| Internal diameter | 0.45m |
| Efflux velocity | 16m/s |
| Exit gas temperature | Ambient, defined as a product gas temperature of 10-20°C with a standard value of 15°C |
| Operational hours | 24 hours a day 8300 hours a year (to take in account planned shutdowns) |
| Operational mode | 95% |

Notes: a See section 2.2.1 for a definition of '5L'. Building heights have been provided by NWL.

2.2 Calculations and assumptions

2.2.1 Effective heights

As per the guidance, the effective height of release has been treated as 0 metres when the emission point is actually released at a point that is either:

- Less than 3 metres above the ground or building on which the stack is located; or
- More than 3 metres above the ground or the building, but less than the height of the tallest building within a distance that's 5 times 'L'.

'L' is the lowest of either

- · The height of the building; or
- The greatest width between 2 points at the same height of the building.

In the case of the BUP, the effective height of release has been calculated as 0, due to the emission point being greater than 3m in height above the ground and less than the height of the tallest building within a distance that's 5 times 'L'. The tallest building is considered to be the post digestion sludge tank which has a height of 15m.

2.2.2 Pollutant concentrations

Post-commissioning, the emissions anticipated from the BUP stack will typically include:

- CO₂
- Methane (slip)
- Traces of:
 - Hydrogen sulphide (H₂S)
 - Siloxanes
 - Toluene
 - Xylene

At present there are no benchmarks for emissions of CO₂, non-methane volatile organic compounds (nmVOCs), siloxanes and methane from the BUP. There are no Environmental Assessment Levels (EALs) identified for siloxane from the H1 guidance or any other published air quality guidelines Therefore, benzene has been selected as a substitute parameter to represent siloxane, as is advised in Environment Agency

^b Reference conditions = 0.3% O2, 20°C, dry

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guidance² when there are no other alternatives for volatile organic compounds. These concentrations are considered to be the maximum values possible and as such provide a worst-case estimate of concentrations for the assessment.

The following assumed concentrations of residual contaminants in the CO₂ off-gas (733.4Nm³/h) have been used in the H1 screening assessment:

- hydrogen sulphide 5mg/Nm³
- benzene (as a surrogate for siloxanes), toluene, xylene 1mg/Nm³ (each)

3 Screening Assessment

3.1 Assessment Criteria

The following section presents the relevant air quality standards that are applicable to the Site and that the Site will be assessed against. These are collectively described as the Environmental Quality Standards (EQS).

The Environment Agency's risk assessment guidance³ provides guidelines on Ambient Air Directive (AAD) limit values, UK air quality objectives and environmental assessment levels (EALs) that the impact should be compared against. There are currently no air quality objectives for siloxane, toluene, xylene or hydrogen sulphide, however there is a limit value for benzene, which is presented in Table 3.1 below. There are also EALs for each of the pollutants, which are presented in Table 3.2. The annual limit value and EAL for benzene are the same. Any exceedances of these EQS may result in further action needing to be taken to reduce the impact on the environment.

Table 3.1: Summary of relevant air quality objectives and AAD limit values

| Pollutant | Averaging period | Limit value (µg/m³) | Allowance (per calendar year) |
|-------------------------|------------------|---------------------|-------------------------------|
| Benzene | 1-hour | - | - |
| (substituting siloxane) | Annual | 5 | None |

The limit values apply everywhere with the exception of:

- a) Any locations situated within areas where members of the public do not have access and there is no fixed habitation
- b) In accordance with Article 2(1), on factory premises or at industrial installations to which all relevant provisions concerning health and safety at work apply
- c) On the carriageway of roads, and
- d) On the central reservations of roads except where there is normally pedestrian access to the central reservation.

Table 3.2: Summary of relevant EALs

| Pollutant | Averaging period | EAL (μg/m³) |
|-------------------------|------------------|-------------|
| Benzene | 1-hour | 195 |
| (substituting siloxane) | Annual | 5 |
| Toluene | 1-hour | 8000 |
| Toluene | Annual | 1910 |

² Environment Agency and Defra (2022). Available online at https://www.gov.uk/guidance/air-emissions-risk-assessment-for- your-environmental-permit

³ Air emissions risk assessment for your environmental permit - GOV.UK (www.gov.uk)



| Pollutant | Averaging period | EAL (μg/m³) | |
|-----------|------------------|-------------|--|
| Videne | 1-hour | 66200 | |
| Xylene | Annual | 4410 | |
| Hydrogen | 24-hour | 150 | |
| sulphide | Annual | 140 | |

3.2 Background Concentrations

In order to assess the risk of emissions on local air quality it is necessary to add the modelled process contribution (PC) to the concentration of pollutants already present in the air (background concentration). Defra background data was used to determine the baseline concentrations of benzene already present in the area. Background concentrations for toluene, xylene and hydrogen sulphide are not available from Defra or local monitoring, and as such have not been included in this assessment.

The annual mean background concentration for benzene for 2021, the most recent available year, is 0.4ug/m³. As the background concentration is well below the relevant EQS and the closest AQMA is approximately 2.1km from the Site, it is therefore unlikely that the Site will lead to any exceedances.

3.3 Stage 1 of Assessment

The outputs from the first stage of the H1 screening assessment are displayed in Table 3.3. The PC for benzene exceeds the Environment Agency's threshold of 1% of the long-term EAL for human health but not for any of the other pollutants (toluene, xylene, hydrogen sulphide). All of the PCs, including benzene, are below the Environment Agency's threshold of 10% of the short-term EAL for human health.

Table 3.3 First stage of Assessment for the BUP Stack

| Substance | Emissions | EAL (µg/m³) | | PC (µg/m³) | | % of EAL | |
|---------------------------------------|------------------|-------------|------------|------------|------------|-----------|------------|
| | rate (g/s) | Long-term | Short-term | Long-term | Short-term | Long-term | Short-term |
| Benzene (substituting siloxane) | 0.000528 | 5 | 195 | 0.0743 | 2.06 | 1.49 | 1.06 |
| Toluene | 0.000528 | 1,910 | 8,000 | 0.0743 | 2.06 | 0.00389 | 0.0258 |
| Xylene | 0.000528 | 4,410 | 66,200 | 0.0743 | 2.06 | 0.00169 | 0.00311 |
| Hydrogen sulphide | 0.002639 | 140 | 150 | 0.372 | 10.3 | 0.266 | 6.87 |

Note: Exceedances of the Environment Agency threshold is shown in **bold**

3.4 Stage 2 of Assessment

As the long-term PC for benzene exceeds the Environment Agency's threshold of 1% of the long-term EAL for human health, the long-term predicted environmental concentration (PEC) for benzene has been calculated by combining the PC and background concentration. As shown in Table 3.4, the long-term PEC is less than 70% of the long-term environmental standards. Therefore, no further assessment of benzene, such as detailed modelling, is required.

CO₂, methane, hydrogen sulphide and nmVOCs including siloxanes are also not substances listed in the Environment Agency guidance⁴ requiring assessment on potential impacts to designated ecological sites.

⁴ Environment Agency and Defra (2022). Available online at https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit



Table 3.4 Second Stage of Assessment for the BUP Stack

| Substance | Background concentration | PC (µg/m³) | % of headroom (EAL- Backgroun | PEC (μg/m³) d) | % of EAL |
|---------------------------------|--------------------------|------------|-------------------------------|-------------------|----------|
| | (µg/m³) | Long-term | | | _ |
| Benzene (substituting siloxane) | 0.4 | 0.0743 | 1.62 | 0.475 | 9.49 |

Based on the findings above, it can be concluded the BUP presents an insignificant impact on local air quality. Stack emissions testing will be undertaken post-commissioning to confirm the very low concentrations of trace contaminants in the BUP off-gas emitted to air.

The approaches and relevant operational procedures that will form part of the Environmental Management System (EMS) are considered to adequately address the emissions to air from the BUP. On this basis, an Emissions Management Plan (EMP) for the BUP is not required.

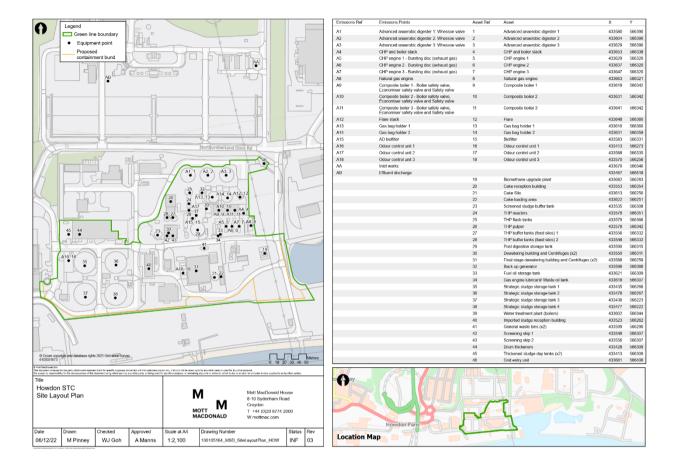
4 Summary

The application to include the BUP to the permit will not increase the risk posed by air emissions as it presents an insignificant impact on local air quality. The H1 screening tool does not account for the distances between the receptors and the emission sources and only presents the maximum predicted pollutant concentrations at any location. Therefore, actual pollutant concentrations are likely to be lower than the predicted outputs of the H1 tool at sensitive receptors, as a result of dispersion over the distance between the emission point and the receptor locations.

Additionally, it is noted in the H1 Software Tool user guide that predicted ground level concentrations are pessimistic and are, therefore, likely to overestimate actual concentrations. The PC values presented from the H1 output are, therefore, very conservative.

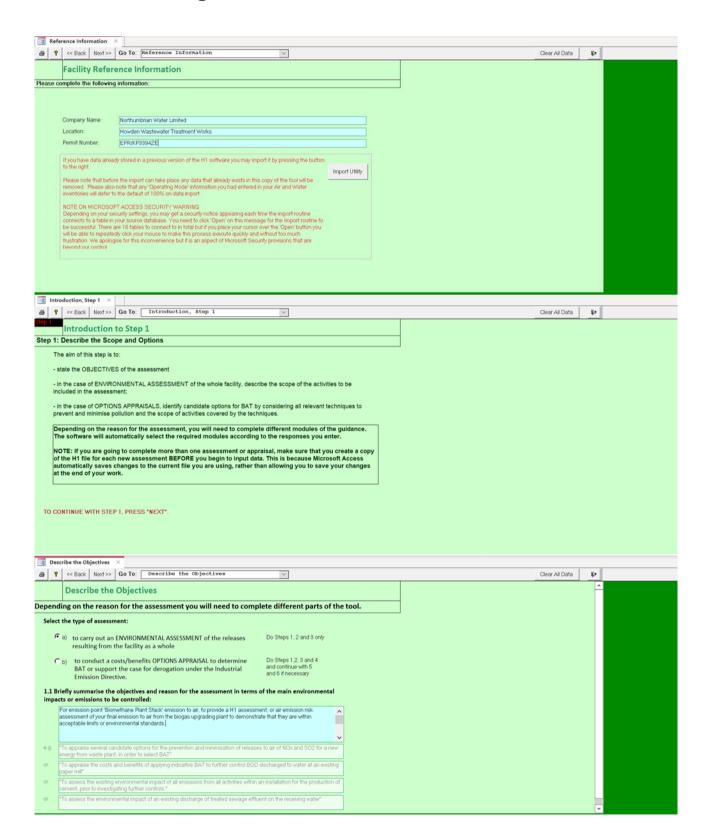


A. Site Layout Plan

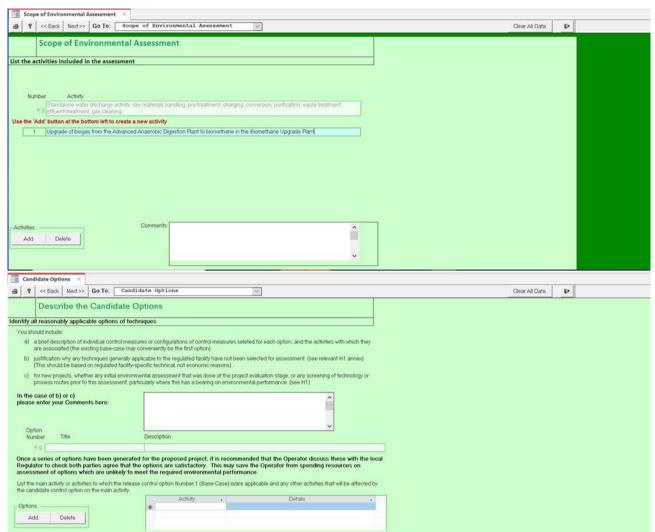




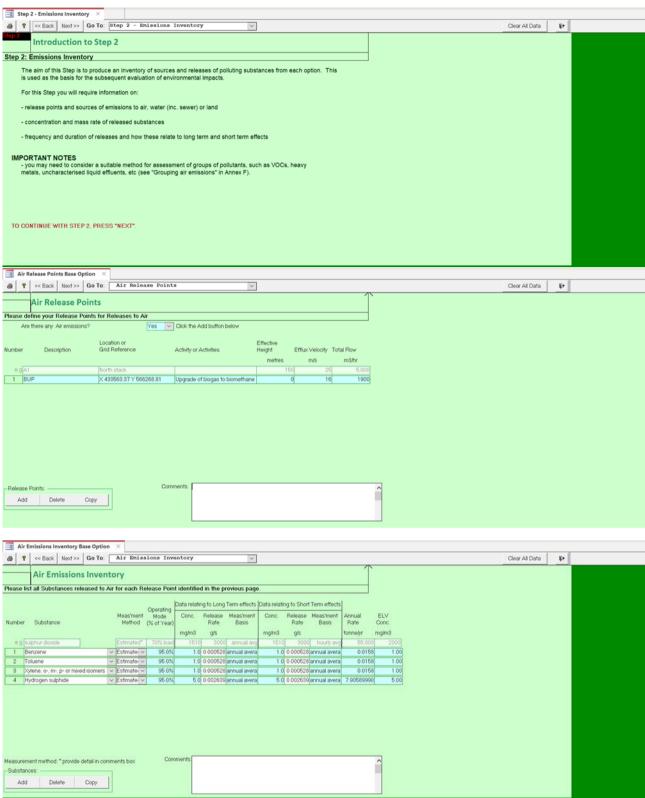
B. H1 Screening Tool



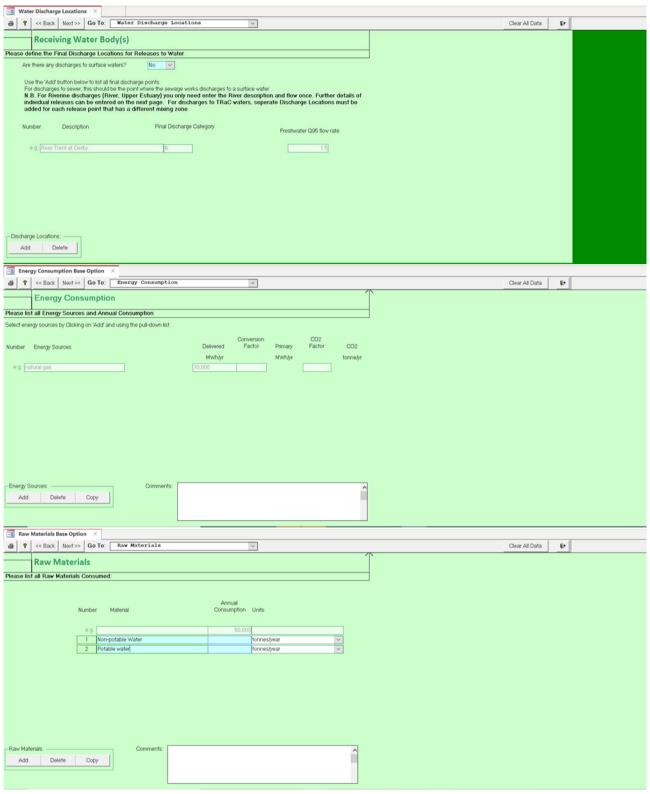




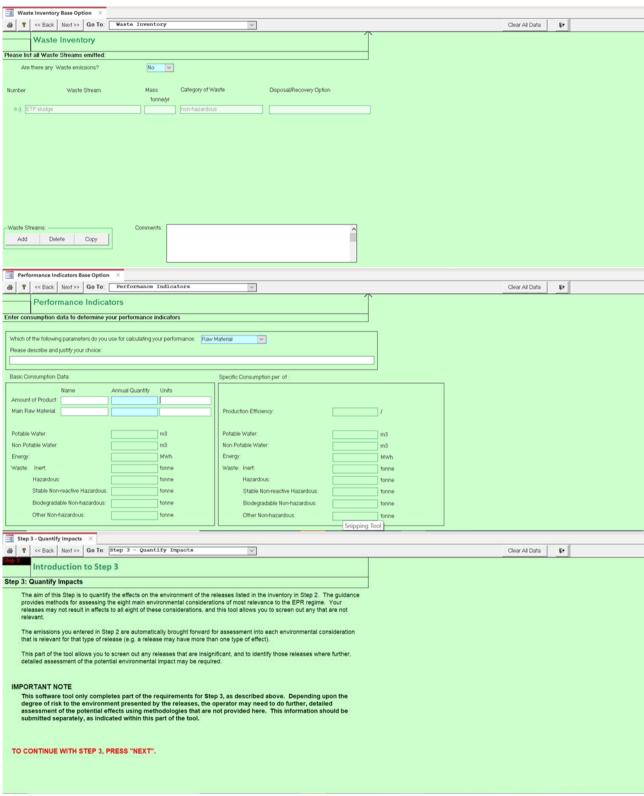








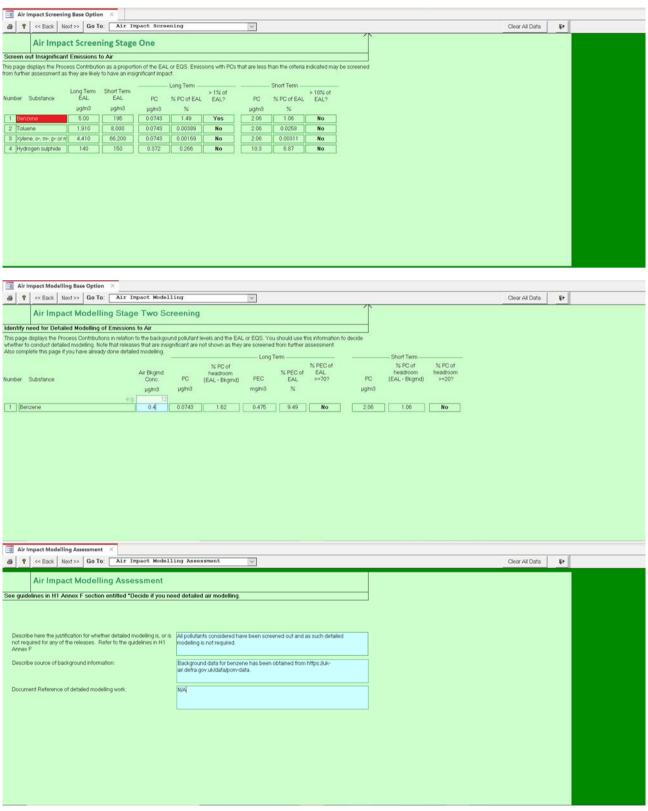






| Identify relevant Impacts × | | |
|---|---|----------------|
| | Impacts | Olear All Data |
| Identify Relevant Impacts | | |
| | | |
| Identify any environmental impacts that are not relevant to this | assessment by deselecting from the list below: | |
| | | |
| Releases in | | |
| Part 2? Justificat | on for omission | |
| Yes 🖸 Air | | |
| Yes Deposition from Air to Land Assessm | ent is for air emissions only. | |
| No Water Assessm | ent is for air emissions only. | |
| No Waste Assessm | ent is for air emissions only. | |
| Yes Visual Assessm | ent is for air emissions only. | |
| Yes Ozone Creation Assessm | ent is for air emissions only. | |
| Yes Global Warming Assessm | ent is for air emissions only. | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |
| no further assessment of this impact w | I impact as not relevant to this assessment, be carried out | |
| and associated assessment pages will | e hidden | |
| Tall Level Environmental Quality | | |
| Local Environmental Quality × | | |
| | al Quality v | Clear All Data |
| Local Environmental Quality | | <u>^</u> |
| | | |
| Describe the Quality of the Environment: | | |
| Provide a brief description of the main local factors that may influen | e the importance of the impact of emissions in the surrounding environment | |
| Air Quality | | |
| Are there any Environmental Quality Standards relating to | Ambient air quality standards benzene, toluene, xylene 1-hour and annual | |
| substances released from the activities, which may be at risk due | Hydrogen sulphide 24 hour and annual | |
| to additional contribution from the activity? (Environmental Quality Standards for air and water are described in | | |
| EPR Technical Guidance Notes) | | |
| Are there any Local Air Quality Management Plans applicable to | N/A | |
| releases from the activity? | | |
| | | |
| Water Quality & Resources | | |
| Are there any Environmental Quality Standards relating to | N/A | |
| substances released from the activities, which may be at risk due to additional contribution from the activity? | | |
| | | |
| Are proposals to abstract water satisfactory in order to obtain an | N/A | |
| abstraction licence? | | |
| Is the activity located in a groundwater vulnerable zone (for | N/A | |
| activities with direct releases to land only)? | | |
| Proximity to Sensitive Receptors | | |
| Is public annoyance likely to be an issue for noise, odour or plume | N/A | |
| visibility? | | |
| | | ▼ |
| Are there any wildlife habitats, eg Special Areas of Conservation of | No, pollutants are not substances listed in the Environment Agency | |
| special Profection Areas, likely to be affected by releases from the activity? (Description of requirements of Habitats Directive is | guidance requiring assessment on potential impacts to designated ecological sites (https://www.gov.uk/guidance/air-emissions-risk-assessment- | |
| provided in EPR Technical Guidance Notes) | for-your-environmental-permit). | <u></u> |
| | | • |
| Air Impacts Base Option × | | |
| | <u> </u> | Clear All Data |
| 4: 1 | | |
| Air Impacts | | |
| Calculate Process Contributions of Emissions to Air | | |
| This table estimates the Process Contribution (PC), calculated as the m | nimum ground level concentration for each emission listed in the inventory, according to | |
| the release point parameters input earlier. If you have more accurate dused instead of the estimated PC. | ta obtained through dispersion modelling, this may be entered as indicated and will be | |
| and instead of the estimated FO. | Long Term — Short Term — | |
| | * Modelled * Modelled | |
| Number Substance | EAL PC PC EAL PC PC | |
| | µghn3 µghn3 µghn3 µghn3 µghn3 µghn3 | |
| 1 Benzene | 6 0.0743 196 2.06 | |
| 2 Toluene | 1910 0.0743 8000 2.06 | |
| 3 Xylene, o-, m-, p- or mixed isomers | 4410 0.0743 66200 2.06 | |
| 4 Hydrogen sulphide | 140 0.372 160 10.3 | |
| | | |
| | | |
| | | |
| | | |
| | | |
| Note that the Process Contribution shown for each substance is the su | n of the individual process contributions of each point from which the substance is | |
| emitted. Process Contributions obtained from modelling data should in | Anporate an electric interesse por installo illow conditions. | |
| State the location of any detailed air dispersion Comments: modelling and also the main assumptions: | ^ | |
| | | |
| | | |
| | | |





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