

**From:** Raymond, Sarah  
**Sent:** 27 February 2023 08:19  
**To:** Mark.McAree@jacobs.com; Karen Fuller  
**Subject:** Application Variation - Maple Lodge STC - Further clarification

Hello Mark/Karen

Thankyou for your submission in response to the request for further information (RFI) dated 27/1/2023. On review on the information provided I have the below clarification points. In order for us to duly make your application please provide a response by the **10/03/2023**.

**1) Payment of outstanding fees**

*We identified in our RFI an outstanding balance of £2,034. We cannot locate this payment.*

**Provide the payment date and reference.**

**2) Bioaerosol Risk assessment (BRA)**

*You have provided a your monitoring locations for Bioaerosols in your response to the RFI, however you have not updated your BRA as requested in question 1 of the RFI.*

**Update and provide your Bioaerosol risk assessment to confirm the sampling locations (National Grid references) and methodology to be used in line with guidance Bioaerosol monitoring at regulated facilities - use of M9: RPS 209 - GOV.UK ([www.gov.uk](http://www.gov.uk)).**

**3) Floating Roof digesters**

*In response to question 2e of the RFI, you have advised that the floating roof digesters use a wet seal to minimise the release of biogas from the floating roof structure. Advising that you employ techniques to minimise the risk of diffuse emissions by:*

- *Adjusting the throttle valve on each digester outlet to balance the relative amount of biogas stored within each floating roof*
- *Managing consumption of biogas via operation of the CHP, and*
- *The use of the flare stack to manage storage of excess biogas in emergency circumstances.*

*It is our current viewpoint that these techniques do not meet the requirements of BAT 14d which require that in order to prevent or, where that is not practicable, to reduce diffuse emissions to air, BAT is to use an appropriate combination of techniques which include the containment, collection and treatment of diffuse emissions, including:*

- *Storing, treating and handling waste and material that may generate diffuse emissions in enclosed buildings and/or enclosed equipment,*
- *maintaining the enclosed equipment or buildings under an adequate pressure and,*
- *where appropriate/relevant collecting and directing the emissions to an appropriate abatement system via an air extraction system and/or air suction systems close to the emission sources.*

*We would also note that the use of the flare to manage storage of excess biogas would not meet BAT. BAT 15 requires that flaring is only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques below:*

- *Correct plant design, including the provision of a gas recovery system with sufficient capacity and the use of high-integrity relief valves, and*

- *Plant management which includes balancing the gas system and using advanced process control.*

*It is our understanding that your response identifies diffuse emissions from the storage of unstable digestate in tanks that are not fully enclosed, and in any issued permit we would implement an improvement condition to address this. This improvement condition will require a plan containing the final designs, and an implementation schedule for the enclosure of the floating roof digesters. The plan will also need to contain a detailed description of the proposed gas utilisation plant, gas storage infrastructure for the biogas produced during anaerobic digestion, pressure relief valves and gas pipework.*

- a) **Provide confirmation that you will meet BAT and fully enclose the floating roof digesters.**
- b) **Provide confirmation that you agree to implement a plan containing final designs, and an implementation schedule for the enclosure of floating roof digesters, and that this plan will contain a detailed description of the proposed gas utilisation plant, gas storage infrastructure for the biogas produced during anaerobic digestion, pressure relief valves and gas pipework.**
- c) **Confirm that you understand the requirements of this IC. Should you wish to deviate from this requirement, your application must be supported with detailed and evidence based alternative measures.**

#### **4) NGR emission locations**

*You have provided in response to question 3g monitoring point locations. This does not include the NGR for point S6.*

**Provide the NGR for emission point S6.**

#### **5) Diesel Generators**

*You currently have permitted under EPR/MB3295YC emission points A11 and A12.*

**Provide a written confirmation that these will provide power to the installation activity.(i.e. be a directly associated activity of the installation).**

Should you have any questions in relation to the above please do not hesitate to contact me.

Kind regards

**Sarah Raymond**

Senior Permitting Officer – Installations

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