Determination of an Application for a PPC Permit under the Pollution Prevention and Control (England and Wales) Regulations 2000 (SI 2000 No.1973)

Decision Document recording the decision-making process

Note: all references to the "PPC Regulations" are to the Pollution Prevention and Control (England and Wales) Regulations 2000 (SI 2000 No.1973), as amended.

Administrative details

Application date and Agency reference ("the Permit Application") TP3732SE 31/03/05

Permit number (the "Permit") **TP3732SE**

Applicant (the "Applicant") **Council of the Isles of Scilly**

Address/location of installation (the "Installation")]
Porthmellon Waste Management Site
St Mary's
Isles of Scilly
TR21 0JY

Name of Determining Officer Elaine Marshall

Name of Authorising Officer S McFarlane
Signature of Authorising Officer:

All relevant documents have been sent to the IPPC Public Registers

Purpose of this document

The Decision Document ("DD") explains how the Applicant's Permit Application has been determined and why the specific conditions in the Permit have been imposed. It is a record of the decision-making process to show how all relevant factors and legislative requirements have been taken into account.

Summary of the decision

A Permit for the Operator to operate the Installation has been granted by the Agency, subject to the conditions set out in the Permit. The Agency considers that in its decision to issue the Permit and in the conditions imposed, it has taken into account all relevant considerations and legal requirements and that the permit will ensure that all appropriate measures will be taken against pollution and that no significant pollution will be caused.

Description of the Permitted Installation

A non-technical description of the Permitted Installation is included in the Introductory Note to the Permit.

This is a 0.5 tonne per hour municipal waste incinerator that incinerates wastes arising in the Isles of Scilly. It is located on St Mary's adjacent to the landfill.

The Incineration plant includes a waste reception pit where a mechanical grab moves the waste into the reciprocating grate combustion chamber. The gases pass to the secondary chamber where the temperature is maintained at 850 ^{o}C. Fuel oil is supplied to an auxiliary burner in the secondary chamber that is used to maintain the temperature during start up and shut down. The waste gases are cooled by introduction of ambient air prior to and after a cyclone. This reduces the temperature of the waste gases to 180 ^{o}C prior to entering the bag filter house; sorbents used are sodium bicarbonate and activated carbon. The treated waste gases are then released to atmosphere through a 22.5 m stack (A1). Bottom ash falls from the combustion chamber grate onto a conveyor that passes through a water quench. Ferrous metal is removed from the bottom ash before it passes to a skip. Cyclone ash also empties into the bottom ash skip.

The release from A1 is continuously monitored for nitrogen oxides (NOx), sulphur dioxide (SO_2), hydrogen chloride (HCl), total organic carbon (TOC), particulate matter and carbon monoxide (CO). Periodic monitoring of hydrogen fluoride (HF), a range of metals and dioxins and furans also takes place. There are no releases to controlled water or to sewer from the Installation. Uncontaminated surface water is released within the installation to four soakaways (WL1 to WL4).
The Isle of Scilly is an Area of Outstanding Beauty and also has a number of Natura 2000 sites and SSSIs.

PART A – THE OPERATOR AND THE DECISION MAKING PROCESS

The Agency's determination procedure

A1 "Duly made" check on Application received

The Application was determined to be duly made as submitted on 31/03/05.

A2 Consultation on the Application

The Application was advertised by the Applicant according to the requirements of Part 1 of Schedule 4 to the PPC Regulations on 21/03/05 in the Cornishman, and the London Gazette

The Agency sent copies of the Application to the following statutory consultees in accordance with Part 2 of Schedule 4 to the PPC Regulations:

- The Cornwall and the Isles of Scilly Health Authority
- Council of the Isles of Scilly
- Food Standards Agency;
- English Nature (holding letter)

A3 Consideration of consultation responses

Responses were received from the following statutory and non-statutory consultees:
Food Standards Agency (19/05/05), Council of the Isles of Scilly (11/05/05), West Cornwall NHS Primary Care Trust (27/05/05) and English Nature on 03/11/05.

No responses were received from members of the public during the determination period.

All responses have been considered by the Agency in determining the Application. The ways in which material responses have been taken into account are described at the appropriate points in this document and are summarised in Appendix 1 to this document.

A4 Matters of commercial confidentiality or national security

The Applicant made no claim for commercial confidentiality and the Agency has not received any information in relation to this Application, which appears to be confidential in relation to any party. There are no matters involving national security.

A5 Further information requirements

The Application was deemed duly made by the Agency, but further information was required in order for the Agency to be able to determine the Application. Further information was requested from the Applicant by notice on 12/07/05 as follows: operation of the incineration plant, site report and discharges to soakaways.

Responses were received from the Applicant on 17/08/05 and 21/10/05. These were placed on the public register and have been taken into consideration by the Agency in making its determination. The responses are covered in the relevant sections of this document.

A6 Regulation 10(3) (operator competence)

The Agency is satisfied that the Operator is the person who will have control over the operation of the Installation after the grant of the Permit, and that the Operator will be able to operate the Installation so as to comply with the conditions that have been included in the Permit

A7 Regulation 10(4) (requirements for SWMAs)

The Operator has replied to application question [B7.1] stating that the installation does not contain an SWMA and the Agency agrees with this assessment.

A8 EPOPRA profile

This is a Part A2 installation that is regulated by the Environment Agency under Secretary of States Direction. A standing fee is therefore submitted by the Applicant for both the application and subsistence. This is determined by the Agency document 'Fees and Charges', which is published each financial year.

PART B – THE INSTALLATION AND ITS MANAGEMENT

B1 Permit Section 1.1.1 - The permitted activities

The Agency has determined that the Installation comprises the following activities listed in Part 1 of Schedule 1 to the PPC Regulations and the following directly associated activities.

- Section 5.1 Part A(2)(a) – The incineration of non-hazardous waste in an incineration plant with a capacity of less than 1 tonnes per hour
- Directly associated activity – collection and disposal of uncontaminated surface water run off with discharge to soakaways

The activities comprise a single installation because the listed activity and the directly associated activity are successive steps of the one process.

B2 Permit Section 1.2 - Site plan

The Operator has provided a plan, which the Agency considers, is satisfactory for showing the site of the Installation and its extent. A plan is included in the Permit at Schedule 5, and the Operator is required to carry on the Permitted activities within the site boundary.

B3 Permit section 1.5 - Minor operational changes; (Changes allowed within the scope of this Permit)

The Permit constrains the Operator to operate the activities subject to the limits and conditions in the Permit. However the Operator may make minor changes as defined within the Application by notifying the Agency in writing under Conditions 1.5.1 -1.5.4.

B4 Site Report and Protection of the site,

The Applicant has provided a Site Report as required by paragraph 1 of Part 1 of Schedule 4 to the Regulations, the main elements of which are:

This is a 0.5 tonne/hour municipal waste incinerator that serves the Isles of Scilly. It is located in St Mary's on an area of wet moorland. There was no previous industrial activity on the site of this Installation. Adjacent is a landfill that is not licensed by the Environment Agency as it is under Secretary of State directions.

The geology is peat then clay, then decayed granite (Ram) overlying granite. Groundwater is present approximately 1m below ground level within the peat. There are no surface watercourses other than man-made ditches that drain water from the surrounding higher ground to the sea.

The Isles of Scilly is an Area of Outstanding Natural Beauty. There are a number of SSSIs within 2 km and a number of Natura 2000 sites within 10km of the Installation.

There are four soakaways present within the Installation boundary and all surface run-off is released at these points. Secondary containment is present for the fuel oil and sewerage tanks, but the remaining potentially polluting substances held on site do not have secondary containment, notably the APC residue, bottom ash and the bottom ash quench tank. Further information received on 17/08/05 indicates that cleaning water from within the Installation discharge to the soakaways and that waste can be deposited on the hardstanding next to the

reception pit. This could potentially lead to leachate from the wastes draining to the soakaways. Information received on 21/10/05 indicates that temporary measures are available to prevent contaminated water entering the soakaways, however the Agency considers that current site practice does not offer suitable long-term protection of the soakaways and has therefore included IP6.

A basic conceptual model has been supplied along with an assessment of the likelihood of pollution. This did not contain an assessment of all potentially polluting substances, but still concluded that there is a reasonable possibility of potential pollution from the Installation. The Agency agrees with this conclusion.

To ensure the continued effectiveness of pollution prevention measures to protect the land the Operator is required to implement and operate under a Site Protection and Monitoring Programme (SPMP), (Conditions 2.1.2 and 2.10.9), the design of which must be reported to the Agency within two months from the date of permit issue, Condition 4.1.7. The Agency considers that the SPMP will address issues such as integrity testing, bunding and monitoring of groundwater and surface water run-off to soakaways.

The Application indicates that there is a "reasonable possibility" of future pollution of the land and therefore reference conditions must be established and limits set. Collection of reference data is required (Conditions 2.10.10 - 2.10.10.2) and the data must be reported to the Agency within six months from the date of permit issue.

B5 Permit Section 2.12 - Multiple Operator installations

This is not a multi-Operator installation

Management

Management techniques are one of the available techniques for emission prevention and control and are therefore part of the determination of BAT [see also Part C ahead] for the installation. The permit contains standard conditions at 1.3 and 2.3, which are designed to deliver the requirements in most cases.

B6 Permit Section 1.3 - Overarching Management Condition

The Agency is not satisfied that appropriate management systems are currently in place, however management structures are appropriate and sufficient financial, technical and manpower resource is available to the Operator to ensure compliance with all the Permit conditions. Standard condition 1.3.1 will ensure that the Operator maintains this position. In addition as requested by the Applicant in the Improvement programme in section B9.0.1 of the Application IP13 has been included. This requires implementation of a suitable environmental management system.

No work instructions / procedures are in place for basic operation of the incineration plant, IP1 requires a number of procedures to be in place by 28/12/05.

B7 Permit Section 2.3 - Management

B7.1 Permit Section 2.3.2-4 Staffing and Training

The information provided in response to Questions in Section 2.3 of the Application indicates that the installation will be operated by an adequate number of staff, who are suitably trained and supervised. Appropriate written operating instructions will be available, and a system will be in place for the recording of staff training. Standard conditions 2.3.1 to 2.3.4 will ensure that the operator maintains this position. (see IP13)

B7.2 Permit Section 2.3.5-6 Operation and Maintenance

The information provided in response to Questions in Section 2.3 of the Application indicates that the installation will be operated and maintained in compliance with the Conditions in the Permit. Standard conditions 2.3.5 and 2.3.6 will ensure that the operator maintains this position.

The Operator has no formal maintenance system that includes maintenance planning, programmed preventative maintenance, breakdown history and recording of all maintenance done. A site work instruction has been included as part of the application, however this only relates to checks that are carried out during start up operation, it does not consider preventative maintenance. From further information received this procedure is now out of date. IP1 requires a suitable system to be in place. Although having an environment management system is not a requirement under the Waste Incineration Directive (WID), it is the Determining Officer's opinion that in order to achieve Art 6(1) and Art 7(1) an EMS should be in place that includes suitable procedures for operation and preventative maintenance (see IP13).

B7.3 Permit Section 2.3.7-8 Incidents and Complaints

The information provided in response to Questions in Section 2.3 of the Application indicates that there is a suitable incident/complaint logging and response system in place. Standard conditions 2.3.7 and 2.3.8 will ensure that the operator maintains this position. The Application indicates that a general complaint form issued by the Council of the Isles of Scilly is available, this needs to be included within the site EMS – see IP13.

B7.4 Permit Section 2.3.9 Fit and Proper

Standard conditions in relation to the maintenance of FAPP status are included at permit condition 2.3.9. For the assessment of whether the operator is FAPP see section A7 above.

PART C: DETERMINATION OF PERMIT CONDITIONS

C1. The legal requirements relating to permit conditions.

Regulation 11 of the PPC Regulations requires that certain general principles are taken into account in the determination of permit conditions for PPC installations. These include that installations should be operated so as to ensure that (a) all appropriate preventative measures are taken against pollution, in particular through the application of BAT, and (b) no significant pollution is caused. Additional general principles include pursuance of the waste strategy objectives of the Waste Framework Directive, using energy efficiently, preventing accidents and returning sites to a satisfactory state on definitive cessation.

Regulation 12 requires the permit to include such conditions as the regulator considers appropriate to comply with a range of requirements including the following:

- ensuring a high level of protection of the environment;
- setting emission limit values (ELVs) for pollutants likely to be emitted from the installation in significant quantities, having regard to their nature and potential to transfer pollution from one environmental medium to another;
- that these ELVs shall be based on BAT for the description of installation but shall take account of its technical characteristics, geographical location and the local environmental conditions;
- that the ELVs may, where appropriate, be supplemented or replaced by equivalent parameters or technical measures;
- that, where an EQS requires stricter ELVs, these shall be set;
- that conditions should aim to minimise long distance and transboundary pollution; ensure protection of the soil and groundwater and management of waste generated; relate to periods of abnormal operation, start up, stoppages etc; set steps to be taken prior to and after definitive cessation of operations; and set suitable emission monitoring, reporting and notification requirements.

Regulation 3 contains the definition of BAT and this is supplemented by a number of other considerations set out in Schedule 2.

There are also a number of other regulatory requirements beyond those in the PPC Regulations described above, which may affect the operating conditions that are required to be included in the permit. These are generally dealt with in Part C5 ahead.

C2. The Agency`s general approach to the determination / condition setting.

The Agency has produced technical guidance for most sectors subject to PPC. Together with cross-sectoral technical guidance, these include indicative standards that the Agency considers likely to deliver the various requirements set out above, having regard to any corresponding BREF Note. The indicative standards are divided into sections that correspond to each of the relevant requirements described in Section C1 above. The operator's application should include information about how it is proposed to operate the installation so as to meet these indicative standards or justify why other standards should apply instead. The Agency will assess the operator's proposals and if it is satisfied will apply specific as well as standard permit conditions designed to ensure the approved standards of operation of the installation will be maintained.

Where there is no specific technical guidance for the activities that make up the installation there will be other related technical guidance that can be used to identify the technologies and techniques employed and the standards that can be obtained. There is also other technical literature that the Agency may use to support its analysis of the installation.

C3. Conditions relating to point source emissions .

There is no indicative BAT guidance available for Part A(2) Waste Incineration Installations as regulated by Local Authority and issued by DEFRA. There is however 'Secretary of States Guidance on Policy and Procedures for A2 and B Installations' (March 2003) as well as the BREF 'Techniques for Waste Incineration' (July 2005). These two publications shall be considered where appropriate. However, it is considered that under these circumstances, BAT will be met if the requirements of the Waste Incineration Directive (WID) are met. The Application has therefore been assessed against the requirements of WID.

The Agency has assessed the operator's BAT proposals as set out in section B2, B3 and B4 of the Application and compared them against the indicative standards that have been developed from the information sources identified above.

The following WID Articles specifically relate to operation of the incinerator and the setting of emission limit values (ELV), therefore only articles 5 –11 and 13 have been discussed below. (Articles 1 – 4, 12 and 14 – 23 deal with aspects the Competent Authority must ensure, the scope and definitions of the Directive as well as legal requirements.

Art 5(1) - Waste is brought to the Installation and deposited into a waste reception pit. If this is full, then waste is placed on the hardstanding next to the pit. (see IP6 with regards to fugitive release to water). Waste is moved via mechanical grab into the incinerator, with the waste being regularly mixed within the pit. Under the circumstances of this particular Installation and as odour has not been identified as an issue either during previous regulation under IPC or reported as a complaint to the local authority, it is considered that this operation is site specific BAT.
Art 5(2) - The Council of the Isles of Scilly operate the small 0.5 tonne/hour incinerator for incineration of mixed municipal waste (EWC Code 20 03 01). The annual throughput is given as 3500 tonnes.
Art 5(3) – N/A – not hazardous waste incinerator
Art 5(4) – N/A - not hazardous waste incinerator
Art 5(5) – N/A – does not generate own waste
Art 6(1) –

- the previous authorisation under IPC did not require bottom ash to be analysed for TOC or LOI. The Applicant has stated that TOC shall be measured, this has been included in Table 2.6.1 of the Permit. The tighter monitoring frequency given in Table 2.6.1 has also been included to ensure that operation at the Installation achieves the limit. Table 2.2.11 in technical measures requires that all bottom ash meet the limits of WID.
- The temperature is monitored in both the combustion and secondary chambers. The thermocouple is located in the centre of the exit of the secondary chamber and not close to the inner wall. The Application stated that residence time has been calculated (B2.1.6) however this does not appear to have been done at the most unfavourable conditions, IP5 therefore requires a validation report ot be submitted.
- The Application states there is an auxiliary burner in the secondary chamber and also that the temperature is controlled to be above 850 ^{o}C. Monitoring of the combustion temperature is required in Table 2.10.1 of the permit, therefore a record will be kept on site for inspection. Condition 2.1.8 also addresses the need to ensure temperature is maintained at >850 ^{o}C during incineration of waste.
- Only Class D fuel oil (gas oil – standard says this shall have <0.2% S content) is used as the main fuel for start up and shut down, no other liquid wastes are incinerated.

Art 6(2) – N/A – not a co-incinerator
Art 6(3) – the incinerator does not have an automatic waste feed installed. IP2 required to ensure that this article complied with.

Art 6(4) – derogation for temperature has not been requested. Application states that residence time is >2 secs and secondary chamber temperature is > 850 C.
Art 6(5) - H1 assessment done used data obtained before the current abatement fitted. An air dispersion model was included with the Application. This used Aermod, with 1 year of meteorological data (from 1999), terrain and building downwash included (no electronic files were provided, therefore the AQMAU Audit Tool was not used). The data used was actual emission data obtained in 1999 prior to fitting abatement, however the model was also run using the releases at the authorised limits under IPC. No conclusion was made in this report, nor background data used. However, the Agency have used the predicted emissions obtained for the authorised limits to consider the impacts at this emission rate. The short-term impact is considered in the following table

Table 1 Short-term predictions using Application dispersion model

	Authorised limits (*WID Limits*)	PC µg/m^3	EAL µg/m^3	% PC of EAL
Particulate	30 *(10)*	1.52	50	0.3%
CO	100 (*50)*	7.94	10,000	0.08%
Hydorcarbon	20 *(10)*	1.55	208 (benzene)	0.75%
HCl	30 *(10)*	2.33	800	0.3%
Metals (total)	5 *(0.5)*	0.39	3 (as CrVI)	12.8%
SO_2	300 *(50)*	23.25	350 (1 hour)	6.6%
NOx	None *(400)*	55.04 Actual emission	200	27.5%
Dioxins	1 (*0.1)*	0.009 pg/m^3	0.3 pg/m^3 (WHO)	3.0%

PC – process contbution
EAL – Environmental assessment level (either Air Quality Objectives or values taken from H1)

This indicates that all the parameters other than metals, SO_2, NOx and dioxins are not insignificant on consideration of the guidelines in H1 (these being >1%). The long-term predictions from the application model have also been considered, these are summarised in Table 2 below.

Table 2 Long-term predictions using Application dispersion model

	Authorised limits (*WID Limits*)	PC µg/m^3	EAL µg/m^3	% PC of EAL	Back-ground conc.	PEC	% PEC of EAL
Particulate	30 *(10)*	0.07	40	0.18%	1.0	1.07	2.7%
CO	100 *(50)*	0.23	350	0.07%	0	0.23	0.07%
Hydrocarbon	20	0.044	16.25	0.28%	0	0.044	0.28%

	(10)						
HCl	30 *(10)*	0.067	20	0.34%	0	0.067	0.34%
Metals (total)	5 *(0.5)*	0.011	0.1	11.0%	0	0.011	11.0%
SO_2	300 *(50)*	0.67	50	1.3%	2.1	2.77	5.5%
NOx	None *(400)*	1.26	40	3.2%	5.7	6.96	17.4%
Dioxins	1 *(0.1)*	0.0026 pg/m^3	0.3 pg/m^3 (WHO)	0.9%	0	0.0026 pg/m^3	0.9%

PEC – Predicted environmental concentration (background plus PC)

These indicate that once the background concentrations are considered, again the impact is considered insignificant when using the guidelines from H1 (where the % PEC of the EAL is <70%).

The impacts to plants have also been considered in Table 3 below.

Table 3 Ecological predictions using the Application model

	PC µg/m^3	Ecological EAL µg/m^3	% PC of EAL	Background conc.	PEC	% PEC of EAL
SO_2	20	0.67	3.35%	2.1	2.77	13.9%
NOx	30	1.26	4.2%	5.7	6.96	23.2%

This indicates that although the process contribution is not considered to be insignificant, once the background concentration is taken into account, the %PEC of the EAL are < 70%. Therefore there is not considered to be a significant impact from the Installation. (see section 19.9)

To confirm that impact from the Installation when operating at the WID limits does not contribute to any impact from the site, the AQMAU Screening tool was run. This used the 30-minute average WID limits for NOx, SO_2, HCl, particulate matter, the limits for mercury and dioxins and the stack parameters given in the 2001 monitoring report and shows the long-term NOx, SO_2 and HCl and the short-term SO_2 were given as a medium risk. See Table 1 below

Table 1 Results of AQMAU Screening Tool

Pollutant	Distance from stack (m)	Model PC conc. (µg/m^3)	Model PC/ AQS	Model PEC/ AQS	Environmental risk
Dioxins	291	9.0 x 10^{-10}	0.00	0.03	Low
HCl	291	0.52	0.03	0.03	Medium
Hg	291	0.00045	0.00	0.04	Low
NO_2 (hourly)	258	19.6	0.1	0.16	Low
NO_2 (annual)	291	3.5	0.09	0.23	Medium
PM_{10} (24 hrs)	325	1.1	0.02	0.28	Low
PM_{10} (annual)	291	0.27	0.01	0.19	Low
SO_2 (15-min)	267	27.2	0.1	0.12	Medium
SO_2 (annual)	291	1.8	0.04	0.08	Medium

H1 Assessment guidance indicates that the PEC is usually dominated by the background concentrations, however in the case of this incinerator, the background concentrations for NO_2

and SO_2 as taken from the Air Pollution Information System shows this not to be the case. The PEC/ AQS is less than 70% for all of the parameters. Short term modelling assessment is complex and H1 indicates that where the PC/AQS is <20% then this is considered to be tolerable. The screening tool assumed operation of the incinerator to be 24/7, when in reality it only operates a maximum of 70% of the year. The Agency is confident that if the incinerator is operated to BAT and therefore meets the WID limits, it is unlikely that any air quality standard will be breached.

Art 6(6) – not appropriate as this is a very small site (0.5 tonne/hour). No outlet for any heat recovered in the vicinity.
Art 6(7) – N/A – Not a clinical waste incinerator
Art 6(8) – installation will be managed by Council of Isles of Scilly.
Art7(1) – the installation abatement includes a cyclone for removal of large particulate matter and filter bags with sodium bicarbonate and activated carbon as sorbents. The filter bags are held in one compartment and have pressure drop monitoring but no method of burst bag detector other than the stack particulate CEM. The sorbents should control acid gases and any dioxin / metal emissions. No continuous monitoring data is available to assess whether the daily or ½-hourly average values for acid gases can be met. Neither are recent periodic monitoring results available. However, the public register does have a part A/B for breach of authorisation conditions in April 2004 for an HCl concentration of 93.8 mg/m^3 and dioxin concentration of 0.33 ng/m^3. Given the lack of data to show that the 100% ½-hourly average can be met, the permit requires that the 97% ½-hourly average limit is used. This has been included in Table 2.2.2. As WID applies from 28/12/05, the IPC authorised limits have also been included as the permit, once issued, is effective from the date of issue.
The Installation employs ambient air to reduce the temperature of the gases after the secondary chamber. This takes place prior to and after the cyclone. There is the potential for the duct gases to fall within the de novo dioxin formation temperature range of 250 to 400 ^{o}C during the transit of the gases through the cyclone. To ensure that dioxin concentrations are maintained within the WID limit, increased monitoring for dioxins is required – see IP10. Table 2 shows that dioxin concentrations reported as part of the annual periodic monitoring did not always achieve the IPC limit.
Art 7(2)- N/A – Not a co-incineration plant.
Art 7(3) – This is a requirement of the standard permit and was required under the IPC authorisation, therefore this will be met.
Art 7(4) – N/A – Not a co-incineration plant.
Art 7(5) – the Agency has not set limits for PAH or PCBs. The standard permit template requires monitoring and reporting of PCB and PAHs in Table 2.10.1, as this is required under the Secretary of State Direction 2000. 'Regulators' implies both local authority and Environment Agency, therefore this monitoring has been included.
Art 8 – there are no discharges to water that arise from the treatment of abated duct gases.
Firewater has been considered in further information received 17/08/05. Currently, the site does not have any method for containment of firewater, however the most likely location for a fire would be in the waste reception pit. The Application indicates that fire fighting equipment and prevention is in place in the waste reception area. Any firewater contained within this pit would be pumped to the wastewater tank for disposal. Secretary of States Guidance states that conditions should be in place to prevent accidents and to mitigate against consequences. Given that there are four soakaways within the Installation boundary that release surface drainage from the Installation to groundwater, IP6 has been included for the Installation to consider options available to them to ensure that only uncontaminated water discharges at these points.
Art 9

- Bottom ash and APC residue are sent for disposal, bottom ash to the adjacent landfill and APC is taken off island to a licensed waste management facility. IP12 considers feasibility of recycling the bottom ash.
- No testing of either ash has taken place. This is a requirement of the permit in Table 2.10.1. Rather than impose the quarterly monitoring frequency as given in the permit template,

annual monitoring has been required. WID only requires sampling to be carried out prior to determining the route for disposal therefore an annual check is considered to be appropriate as this is an A2 listed activity. Monthly analysis of TOC in bottom ash is required in Table 2.6.1 and discussed above.

- After passing through the quench tank, the bottom ash falls from the conveyor into a trailer. This is unbunded. The trailer once full is transported to the adjacent landfill for disposal of the ash. APC is stored as large 1 tonne bags in an unbunded area covered by a tarpaulin. IP6 requires storage of all ash to be assessed with regards to fugitive releases to the soakaways.

Art 10(1) – Only CO, O_2 and particulate monitors are in place. Analysers for SO_2, NOx, TOC, HCl, Pressure, Moisture and temp. to be installed at release to air A1 by 28/12/05 – IP3
Art 10(2) – dealt with in standard permit
Art 10(3) – dealt with in standard permit
Art 10(4) – dealt with in standard permit
Art 10(5) – Application states that the CEM uncertainty values given in Annex III shall be met. CEN standards shall be used where possible and all samples shall be representative.
Art 11(1) – see relevant sections below
Art 11(2) – see Art 10(1), periodic monitoring for metals and dioxins dealt with in permit
Art 11(3) – IP5 requires a CFD to be submitted. Application states that validation has been done using volume flow rates.
Art 11(4) – Applicant has requested derogation for periodic monitoring of HF in place of continuous monitoring as HCl abatement is in place. No continuous monitoring data is available to show that HCl emissions are within limits of previous permit. However, the Agency have agreed the derogation subject to further information being provided through IP9 within the first six months of permit issue.
Art 11(5) – not requested, therefore continuous monitoring of moisture to take place
Art 11(6) – Not requested
Art 11(7) – Dioxins will be monitored twice a year See comments for Art 7(1). IP10 in place to request two further dioxin monitoring campaigns within first 12-months of permit operation as the Application does not support any information that shows dioxin concentrations are able to meet the WID limit of 0.1 ng/m^3.
Art 11(8) – dealt with in standard permit
Art 11(9) – Applicant has stated through B9.01, the improvement conditions, new software and a data logging system to be in place to record and produce reports to the requirements of WID. This is reflected in IP4
Art 11(10) –

- the Incinerator does not have continuous monitoring in place for all WID parameters, therefore the Application is unable to show that either the 100% or the 97% ½-hourly average ELVs can be met. Data supplied and on the public register, as shown in Table 2, does not show a good compliance record with the WID limits prior to fitting of the current abatement system. Since this occurred, data compliance through periodic monitoring is more consistent. No recent periodic monitoring data is available to show that the WID limits can be complied with through current operational practices. However, a part A/B breach of conditions is on the public register for April 2004, when hydrogen chloride concentration was reported as 93.8 mg/m^3 and dioxins as 0.33 ng/m^3. Given this, by setting the 100% ½-hourly average for gases from the 28/12/05 would not seem practical as the Operator may have initial difficulties in complying with this. WID does allow for the option to use an ELV for 97% ½-hourly average. Under these circumstances, and as this is a Part A2 activity it would seem appropriate to set the 97% ½-hourly averages.
- To ensure the dioxin concentrations are complied with, IP10 requires more frequent sampling for the parameter during the first 12 months of permit operation.
- Table 2 shows the CO limit should be complied with – the permit requires a 100mg/m^3 30-min average.
- The permit templates requires quarterly monitoring for metals at municipal waste incinerators (MWI). Although this is an MWI, as it is a part A2 Installation and operates as

0.5 tonne/hour, quarterly monitoring is not considered appropriate. Therefore a bi-annual monitoring frequency has been set.

Art 11(11) – as defined within the standard permit
Art 11(12) – as defined within the standard permit
Art 11(13) – as defined by Art 17
Art 11(14) – N/A – no water discharge from treatment effluent from abated duct gases.
Art 11(15) - N/A
Art 11(16) – N/A
Art 11(17) – as defined within the standard permit.
Art 13

- The permissible time period is as defined by the standard permit
- The Application states that if a power failure occurs to the abatement or CEMs system, shutdown will be initiated in 1 hour, and completed within 3 hours. Also shut down ends after 2 hours, once waste has stopped being fed into the incinerator.
- The Application has asked for the derogation for the higher ELVs for CO, particulate and TOC on failure of these CEMs. The Applicant has only proposed to use a portable CO meter if the CO CEM at A1 fails. No surrogate methods have been proposed for TOC or particulate matter. This is agreed with the Agency.
- No surrogate measures have been given in the event of the TOC or particulate monitor failing, therefore no derogation has been granted for failure of these CEMs.

Table 2 Periodic monitoring returns

		Periodic monitoring Test dates				
	WID limits 30-min averages	25/03/97	19/05/99	17 & 18/07/01	23 & 24/04/03	19 & 20/08/03
particulate (test 1) mg/m^3	30	437	428	19	1	
particulate (test 2) mg/m^3	30	365	294	16	ND	
CO mg/m^3	100	13	41	41	10	
NOX mg/m^3	400			224	219	
VOC mg/m^3	20			3	ND	
HCl mg/m^3	60	904	259	15	204	18
HF mg/m^3	4			ND	1.9	
SO_2 mg/m^3	200	256	977	29	1.62	
Heavy Metals mg/m^3	0.5	27.36	3.83	0.54	0.191	
Cd mg/m^3	0.05	0.5	0.15	ND	0.001	
Hg mg/m^3	0.05	0.06	ND	0.02	0.001	
Dioxins /furans (test1) ng/m^3	0.1	1.1	14.96	ND	3.87	0.0034

ND – at limit of detection

The Agency has also reviewed the operator's assessment of the environmental impact of emissions from the installation . This has been done using both the H1 assessment and air dispersion modelling. However the concentration data used was that obtained from periodic monitoring of the release point to air prior to fitting the current abatement system therefore this is not considered to be representative of the current situation. However the authroised limts were also modelled. Although these are greater than the WID limits, taking into considereation the background concentrations and looking at the predicted emission concentration, the %PEC of the EAL were all less than the guidelines given in H1. See Article 6(5) discussion in C3.

The AQMAU Screening Tool was used by the Agency – see previous discussion. This pointed to no likely breach of the air quality standards.

Releases to controlled water / sewer
There are no discharges from the Installation to controlled water or to sewer therefore a Direct Toxicity Assessment is not required.

Releases to land via soakaway
The Installation has four releases to soakaway. Surface run off from within the Installation drains to these release point; no interceptors are present. Potential releases of contaminated run off from within the Installation have been identified – see section B4 of this document.

The Application does not show how contaminated drainage from the Installation is prevented from entering the soakaways. Given that there are vehicle movements, there is the potential for run off to be contaminated with oil – this is a list I substance and therefore cannot be permitted to enter groundwater. There is no secondary containment of the bottom ash or APC residue. Waste is also placed onto hardstanding prior to this being pushed into the waste reception pit. IP6 has therefore been included for this purpose.

The Agency has considered the BAT proposals put forward by the Applicant in the Application and further information received on 17/08/05 and 21/10/05. In order to meet with BAT (and WID) a number of improvement conditions have been included. Where these are related to meeting a specific Article under WID a timescale of 28/12/05 is required, otherwise timescales have been used as agreed with the Applicant.

C4. Conditions relating to fugitive emissions.

Various requirements in regulations 11 and 12 mean that control of fugitive emissions should be secured by permit conditions. The Agency has assessed the operator`s proposals for control of fugitive emissions and considers that they will meet the regulatory requirements. Standard conditions 2.2.4 and 2.2.5 will ensure that the operator maintains this position.

The Application does not have a formal maintenance system in place. IP1 requires work instructions/ procedures to be in place by 28/12/05 and IP13 requires an EMS to be in place (see B7.2 of this document). This is to ensure that plant operates without generating any fugitive emissions from joints, valves etc.

Fugitive emissions to air - Bottom ash is placed into a trailer located beneath the conveyor. Since the bottom ash has passed through a water quench, it remains wet and therefore dust arising from this operation is considered to be negligible. APC residue is stored on hardstanding in 1-tonne bags and covered with a tarpaulin. It is considered unlikely that dust would cause a problem from this operation.
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Chemicals for abatement are stored in a purpose built weatherproof housing.

Fugitive emissions to controlled water / groundwater - On receipt of wastes, and if the reception pit is full, this is stored on the hardstanding adjacent to the pit. From the application, the hardstanding area drains to the four soakaways within the Installation, therefore there is the potential for this area to drain to the soakaways. In addition as discussed previously the storage of bottom ash and APC residue are also potential pollutants therefore IP6 has been included to ensure this does not take place.

C5. Conditions relating to raw materials and water.

The use of raw materials and water are some of the available techniques for emission prevention and control and are therefore part of the determination of BAT for the installation. In addition “the consumption and nature of raw materials (including water) used in the process” is one of the factors to be considered in determining which of the other available techniques are BAT (see Schedule 2 of the PPC Regulations). The Agency has assessed the proposals set out in the Application in response to question B2. They are considered satisfactory and the standard Conditions 2.4.1.1-3 will ensure that the operator maintains this position .

The waste incinerated is municipal waste arising from the Isles of Scilly complex, a maximum throughput is given in the Application and in the permit.

Class D fuel is used (gas oil of 0.2% S content) for start up and maintaining the combustion temperature. A requirement that gas oil used after 01/01/08 has a sulphur content <0.1% is included in Table 2.2.11. This ensures the Installation will meet the Sulphur Content of Liquid Fuel Oils (England and Wales) Regulations 2000.

H1 reports water usage as 94m^3/year – the majority of this is for the bottom ash quench tank.

C6. Conditions relating to waste handling and storage.

Waste handling and storage techniques are some of the available techniques for emission prevention and control and are therefore part of determination of BAT for the installation. Regulation 12(9)(b) also requires consideration of appropriate measures for the management of waste generated by the installation. The Agency considers that the Applicant has appropriate measures in place for the storage and handling of waste to prevent releases during normal operations and to minimise the potential for accidental releases. The standard Permit Condition 2.5.1 will ensure that the operator maintains this position.. However further requirements in respect of waste storage and handling have been included in the Improvement Programme, see IP6 and section C4 of this document.

C7. Conditions relating to Odour

On consideration of the Application and from its previous knowledge of the operation of the installation, the Agency considers that the activities carried out at the installation have the potential to cause odour, but that such odour is not likely to cause annoyance. Agency therefore considers that the standard Condition 2.2.6.1 is appropriate and sufficient.

C8. Conditions relating to Noise (and vibration)

On consideration of the Application and from its previous knowledge of the operation of the installation, the Agency considers that the activities carried out at the installation have the potential to cause noise, but that such noise is unlikely to progress significantly beyond the installation boundary. Agency therefore considers that the standard condition 2.9.1 is appropriate and sufficient. A noise report carried out in April 2002 has been submitted with the Application. This report was carried out in response to a specific complaint due to the fan at the stack. A noise attenuator had been fitted and this report was to measure the noise level at various levels of fan operation. This does not indicate a problem. The response from the Council of the Isles of Scilly (see Appendix 1) shows that two complaints were received in 2003, but these were resolved through informal means.

IP13 requires a suitable EMS to be in place, as this will include environmental impacts from new equipment, it is considered that potential noise problems will be considered at an early stage.

C9. Conditions relating to Pre-operation

Regulation 12(9)(d) allows the imposition of conditions in respect of "steps to be taken prior to the operation of the installation. The Agency considers that the circumstances do not require the imposition of any pre-operational Conditions.

C10. Conditions relating to Off-site (including Off-site monitoring)

Regulation 12(12) allows the imposition of off-site conditions, subject to compensation in accordance with the Regulations. The Agency considers that it is not necessary to impose any off-site Conditions.

C11. Conditions relating to Waste recovery or disposal

Regulation 11(3)(a) requires a consideration of appropriate conditions to ensure that "waste production is avoided in accordance with Council Directive 75/442/EEC on waste; and where waste is produced, it is recovered or, where that is technically and economically impossible, it is disposed of while avoiding or reducing any impact on the environment". The Agency has considered the proposals in the Application for the avoidance of waste production and, in respect of such waste as is produced, its potential recovery or subsequent disposal. The Agency is satisfied that the proposals show that waste production will be avoided as far as possible, and where waste is produced it will be recovered unless technically and economically impossible. The Agency is further satisfied that the Operators justification for their proposed waste disposal option shows that such waste that does arise from the installation that can not be recovered will be disposed of using a disposal method that avoids or reduces any impact on the environment. Standard Conditions 2.6.1 will ensure that this position is maintained. However further requirements in respect of waste recovery and disposal have been included in the Improvement Programme. IP12 requires the operator to consider possible recycling routes for the bottom ash.

C12. Conditions relating to Energy Efficiency

Some aspects of energy efficiency form part of the consideration of BAT above. Regulation 11(3)(b) also requires appropriate conditions to be imposed in order to secure that "energy is used efficiently". The Agency has considered the information in the Application in respect of energy efficiency, including that for the Applicant's energy management system. The Agency is satisfied that at the commencement of the Permit, the installation should be operated in an energy efficient manner, and that Standard Conditions 2.7.1 – 2.7.3 are appropriate and sufficient. No energy recovery takes place at the Installation due to the small size of the plant.

Condition 2.7.3 has been amended to reflect that this is a Part A2 listed activity. The amendment requires the Installation to have regard to the Secretary of States Guidance 'General Guidance on Policy and Procedures for A2 and B Installations' and not the Agency Horizontal Guidance H2.

C13. Conditions relating to Accident prevention and control

Regulation 11(3)(c) requires the consideration of appropriate conditions to secure "the necessary measures are taken to prevent accidents and limit their consequences."

The Agency has considered the accident management plan submitted under Section 2.8 of the Application and considers that in addition to the standard requirements of Condition 2.8.1, the

Operator should be required to provide a further Accident Plan for agreement with the Agency having regard to the Secretary of States guidance. See IP7.

Article 8(7) requires prevention / storage to be available for any contaminated rainwater runoff or for firewater. The Operator is required through IP6 to propose options available to comply with this WID requirement.

C14. Conditions relating to Closure and decommissioning

Regulation 11(3) provides that "upon definitive cessation of activities the necessary measures are taken to avoid any pollution risk and to return the site of the installation to a satisfactory state" .Regulation 12(9)(d) also requires that there be appropriate conditions in terms of steps to be taken after the definitive cessation of operations.

The Application states that a site closure plan is not currently available, therefore IP8 has been included to obtain the plan. Once submitted and agreed, the Agency considers that the proposals for closure and decommissioning will be satisfactory and that Standard conditions 2.11 will ensure that the operator maintains this position.

C15. Conditions relating to On-site monitoring

Regulation 12(9)(f) requires consideration of appropriate conditions to address "emission monitoring requirements specifying measurement methodology, frequency, and evaluation procedure" The Agency has decided that emissions monitoring should be carried out for the parameters listed in Tables 2.2.2 and 2.2.2a and 2.10.1 using the methods and to the frequencies it has specified in those Tables. (See Condition 2.10.1.) These monitoring requirements have been imposed in order to meet the requirements of WID.

In order that the Operator complies with the permit from date of issue, the IPC authorised limits have been included in table 2.2.2 and are valid until 27/12/05. From the 28/12/05, the WID ELVs have to be met.

A number of monitoring requirements as given in the standard permit template that are not stipulated in WID. As this is a Part A2 and there is no specific guidance available for this sector, inclusion of monitoring through an IP for measurement of PM_{10}, $PM_{2.5}$ and PM_1; periodic monitoring of particulate, SO_2, NOx, HCl, CO and TOC in table 2.2.2 will not therefore be required.

It is considered appropriate to require the Operator to ensure the CEMs in place for the continuous monitoring ELVs meet with the requirements of BS EN 14181 therefore IP11 has been included.

Periodic monitoring has been carried out using MCERTS accredited contractors. The CEMs for HCl, TOC, SO_2, NOx and the peripheral parameters are to be installed by 28/12/05 and shall have MCERTS accreditation, IP3 requires this and for the certificates to be forwarded to the Agency. The particulate CEM is not being upgraded, however IP11 will ensure correct calibration, and if any analyser is unable to meet the requirements of the QAL2 section of BS EN 14181, IP14 requires the analyser to be replaced.

The Application states that the uncertainty for the CEMs shall meet with the requirements of WID.

As required under WID monitoring requirements have been set by the Agency in Condition 2.10.2 for temperature, pressure, moisture and O_2 monitoring to take place at release point A1.

In addition, the combustion temperature of the secondary chamber is also required to be monitored. These process parameters are not however required to be reported to the Agency through Schedule 2, but records should be available on site for inspection

C16. Conditions relating to Records

Effective record keeping is considered to be one of the management techniques for emission prevention and control. It is considered that the standard condition requirements are appropriate for this Installation.

C17. Conditions relating to Reporting

Regulation 12(9)(f) requires consideration of appropriate conditions in respect of the reporting of monitoring results. It is considered that the standard condition requirements are appropriate for this installation. Reporting is given in Schedule 2 of the permit, this is required to be submitted to the Agency on a 6-monthly basis. Performance data relative to the incineration process is required to be reported, and includes mass of fuel oil used relative to the mass of municipal waste incinerated. Reporting of water use is not considered appropriate as only a small volume is used through out the year (reported as <100 m^3/year). Energy will be assessed annually through condition 2.7.2 and should be covered as part of a site inspection.

The mass of APC residue or Bottom ash have not been included as there is no public weighbridge on the Isles of Scilly

Dioxins reporting in Schedule 3 is not required until 01/01/07 as IP10 requires the Operator to analyse and submit four dioxin test in the first year of permit operation.

C18. Conditions relating to Notifications

Regulation 12(9)(f) requires consideration of appropriate conditions for notification of incidents or accidents, which may cause significant pollution. It is considered that the standard condition requirements are appropriate for this installation.

C19. Other legal requirements relevant to the determination of the Application and to the setting of permit conditions

Industry Specific

C19.1 Relevant Secretary of State Directions

The following Secretary of State Directions made under the PPC Regulations is considered to apply to the determination of this Application:

- Pollution Prevention and Control (Waste incineration Directive) (England and Wales) Direction 2000

In addition, the following Secretary of States Direction was made and is considered to apply to the determination of this Application,

- Regulation of a Part B process under Environment Protection Act 1990 part 1 to be undertaken by the Environment Agency issued on 03/10/96 and effective on 10/10/96.

C19.2 Regulation 12A – implementation of the Solvent Emissions Directive (SED) (1999/13/EC)

The Installation does not include any activity listed in Annex I of the Directive or activity which, whilst listed in Annex I, is above the relevant threshold in Annex IIA. so no provisions of the SED apply.

Air

C19.3 Environment Act 1995 – Section 81 (National Air Quality Strategy)

In determining the conditions for this Permit, the Agency has had regard to the National Air Quality Strategy. The Agency considers that it has taken its decision in compliance with the NAQS, and that there are no additional conditions that should be included in this Permit.

Water

C19.4 Groundwater Regulations 1998

The installation does not permit the direct discharge of List 1 substance(s) to groundwater. The operation of the installation may cause the disposal of a List 1 substance or other activity that might lead to an indirect discharge of such a substance but "prior investigation" within the meaning of the Regulations shows that indirect discharges would not occur and conditions have been imposed to prevent such discharges- see IP6. The conditions at section 2.2.3 secure these and other requirements of the Groundwater Regulations.

C19.5 Water Framework Directive Regulations 2003

Consideration has been to whether any additional requirements should be imposed in terms of the Agency`s duty under regulation 3 to secure the objectives of the Water Framework Directive through (inter alia) PPC permits, but it is felt that existing conditions are sufficient in this regard and no other appropriate requirements have been identified.

Waste

C19.6 Waste Management Licensing Regulations (WMLR 1994) - (pursuit of the relevant objectives where there is the disposal or recovery of waste)

The installation includes no activities for the disposal or recovery of waste.

C19.7 Waste Oils Directive

The installation does not contain waste disposal or recovery activities involving waste oils to which the Directive applies but it is considered that its requirements are already met by the permit conditions.

C19.8 Hazardous Waste Directive

The installation does not contain hazardous waste disposal or recovery activities to which the Directive applies.

Conservation

C19.9 The Conservation (Natural Habitats etc) Regulations 1994

The proposed installation would not be likely to have " a significant effect on a European site" because an assessment (HR01) has shown there is unlikely to be a significant effect on the

European sites either from the Incinerator or in-combination with other plans and projects. The Completed Appendix 11 was sent to EN and there reply on ?? agreed with the Agency conclusions

C19.10 Countryside and Rights of Way Act 2000 (CROW 2000)

Section 85 duty concerning Areas of Outstanding Natural Beauty (AONB)

Consideration has been given as to whether any additional requirements should be imposed in terms of the Agency's duty to have regard to conserving and enhancing the natural beauty of the AONB under s85 CROW 2000, but it is felt that existing requirements are sufficient in this regard and no other appropriate requirements have been identified.

Section 28G Wildlife and Countryside Act 1981 (WCA 1981) duty concerning SSSIs

Consideration has been given as to whether any additional requirements should be imposed in terms of the Agency's duty under section 28G WCA 1981 (as amended by Schedule 9 of CROW 2000) to take reasonable steps to further the conservation and enhancement of the SSSI but it is felt that existing requirements are sufficient in this regard and no other appropriate requirements have been identified.

Section 28 I WCA 1981 duty to consult English Nature/CCW

Consultation with EN was considered unnecessary as an assessment under the CROW Act 2000 has shown there is unlikely to be a significant effect on the SSSIs either from the Incinerator or in-combination with other plans and projects.

C19.11 Environment Act 1995 – Section 7 (Pursuit of Conservation Objectives)

Consideration has been given to whether any additional requirements should be imposed in terms of the Agency's duty to have regard to the various conservation objectives set out in s 7 EA 1995, but it is felt that existing requirements are sufficient in this regard and no other appropriate requirements have been identified.

General

C19.12 Environment Act 1995 – Section 4 (Pursuit of Sustainable Development)

By section 4 of the EA 1995, the Agency has a duty to contribute towards achieving sustainable development as considered appropriate by Ministers and set out in guidance issued to it. The relevant statutory guidance issued to the Agency by the Secretary of State for Environment, Food and Rural Affairs is *The Environment Agency's Objectives and Contribution to Sustainable Development: Statutory Guidance (December 2002)*. It is noted that this document:

> "*provides guidance to the Agency on such matters as the formulation of approaches that the Agency should take to its work, decisions about priorities for the Agency and the allocation of resources. It is not directly applicable to individual regulatory decisions of the Agency*".

In respect of regulation of industrial pollution through the PPC Regulations, the Guidance refers in particular to the objective of setting permit conditions "*in a consistent and proportionate fashion based on Best Available Techniques and taking into account all relevant matters…*". The Agency considers that it has pursued the objectives set out in the Government's guidance, where relevant, and that there are no additional conditions that should be included in this Permit to take account of the section 4 EA 1995 duty.

C19.13 PPC Regulations - Schedule 4, Part 2. para 13 (EIA Directive information)

No information concerning any Environmental Impact Assessment for the installation was supplied by the Applicant [in response to Question B5.1 in the PPC Application Form].

C19.14 Human Rights Act 1998 (HRA 1998)

The Agency has considered potential interference with Convention rights in reaching its decision and considers that its decision is compatible with its duties under the Human Rights Act 1998. In particular, it has considered the right to life (Article 2), the right to a fair trial (Article 6), the right to respect for private and family life (Article 8) and the right to protection of property (Article 1, First Protocol). The Agency does not accept that Convention rights are engaged in the present case.

APPENDIX – Consultee responses

Summary of consultation responses received and the way in which they have been taken in to account in the determination process:

Response received from consultee	Brief summary of issues raised	Summary of actions taken or show how this has been covered
Council of the Isles of Scilly	Two noise complaints received 07/07/03 and 08/07/03. Council took informal action and Incinerator altered operational procedures to take into account neighbour sensitivities	See C8
Food Standards Agency	Note no annual mass emissions for dioxins quoted in the Application	Noted
	Application shows that normal dioxin emission concentrations are given as 3 ng/m^3 compared to the WID limit of 0.1 ng/m^3. Need to confirm that with abatement in place, the WID limit can be met.	See section C3 and IP10.
West Cornwall NHS Primary Care Trust	Further H1 should be done as data used was from prior the fitting of abatement.	A Dispersion model was supplied with the Application, Agency considerd tis with PEC info and also ran the AQMAU Screeing Tool. The results indicated that no furhter modelling was required.
	Interlocking systems should be in place to prevent waste feed during abnormal operations.	See IP2
	Confirmation that derogation for NOx until January 2008 has been agreed.	This is not needed, therefore the derogation is not required.
	Applicant should have a suitably accredited EMS in place to protect the local populace.	See IP1 and IP13