

## **Environment Agency permitting decisions**

### **Bespoke Permit**

We have decided to grant the permit for Euston Biogas Plant operated by Strutt & Parker (Farms) Limited.

The permit number is EPR/MP3034WS/A001.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

### **Purpose of this document**

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

### **Structure of this document**

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

## Key issues of the decision

### 1. Environment Agency Position Statement

The Applicant (now the operator) has applied for an environmental permit that will allow the operation of an anaerobic digestion (AD) facility with the upgrading and combustion of the resultant biogas. The operator reports that that only maize silage (non waste) will be accepted as feedstock for the digesters during commissioning and for at least the first 6 months following commissioning.

The Environment Agency's position statement "*Anaerobic Digestion and Environmental Permitting*" (dated April 2010) specifies that:

*Any crop which is grown specifically for digestion in an AD plant is not waste. If the input materials to an AD plant are non-wastes, the status of each output materials as a waste or non-wastes will depend on the circumstances. Assuming that the main purpose of the plant is to recover energy from the biogas produced, the biogas will be a non-waste. In order to classify the "digestate" as a non-waste, it must meet three tests:*

- *it must be certain to be used*
- *without any prior processing and;*
- *as part of a continuing process of production*

*In these circumstances, an environmental permit would not be required.*

*We consider manure and slurry used as feedstock for AD to be wastes. If manure and/or slurry is digested together with energy crops, the overall feedstock is waste and subject to environmental control (via an environmental permit).*

In view of the above position statement, an environmental permit is not required for this facility if using non-waste feedstock. In addition, the facility will not require an environmental permit in the event the operator accepts crop residues as feedstock in accordance with the Environment Agency's Briefing Note – *Crop residues used as feedstocks in anaerobic digestion plants* (dated September 2014).

The conditions in this permit shall come into force in the event the operator accepts wastes specified in Table S2.2 for treatment via AD at this facility. We have included a Pre-operational Condition 1 (POC 1) that requires the submission of a commissioning plan to ensure that appropriate measures are in place to protect the environment and human health when using waste at the facility.

As the application is for an environmental permit that allows the acceptance and treatment of waste and non waste feedstock, subsistence charging shall commence once the permit is issued.

### 2. Assessment of impact on groundwater

The bedrock deposits at the site are designated as a "principal aquifer". The site is located within an "outer" source protection zone (or SPZ 2). These zones are defined by a minimum 400-day travel time from a point below the

water table to an abstraction. The zone has a minimum radius of 250 metres or 500 metres around the source, depending on the size of the abstraction. The Environment Agency's position statement for new development of non-landfill waste operations in relation to groundwater protection is specified in the technical guidance – Groundwater Protection Principles and Practice GP3 (pages 81 to 83):

*We will only object to proposals for new development of non-landfill waste operations in the source protection zone 1 (SPZ 1) where we believe the operation poses an intrinsic hazard to groundwater. We will oppose such new developments via the development planning system.*

*For any other non-landfill waste operations that are proposed in SPZ 1, when considering any environmental permit application, we will usually require detailed risk assessment and additional mitigation measures to be put in place to manage any risks to groundwater. Accordingly, we will raise this as a serious concern when responding to any planning application consultation. In sensitive groundwater locations, we will therefore strongly encourage parallel tracked environmental permit applications with planning applications.*

*Outside SPZ 1, we will agree to proposals for new developments of non-landfill waste operations where risks can be appropriately controlled by an environmental permit or a relevant waste exemption.*

We have assessed the operator's mitigation measures under the Planning and Environmental Permitting Regime. The operator has taken the advantage of twin-tracking the discharge of the Planning conditions and the determination of the application for an environmental permit.

#### Mitigation measures

The operator reports that operational areas of the site will benefit from an impermeable concrete surface which will prevent the release of potentially polluting liquids to surface water and groundwater. The whole site will be lined with a dense asphaltic concrete (DAC) secondary containment liner and sealed drainage system. All process pipework will be above ground. Secondary containment will be provided for all tanks containing liquids whose spillage could be harmful to the environment. The proposed site secondary containment is designed to hold a minimum of 110% of the capacity of the largest tank or 25% of total tank volume, whichever is the greater.

We have included Pre-operational Condition 2 (POC 2) which requires the submission of a report confirming that the construction quality assurance (CQA) and integrity of the proposed DAC secondary containment and sealed drainage are fit for purpose and in accordance with industry standards prior to commissioning using waste. This will ensure that the proposed site containment is properly designed to minimise risks to the environment and reduce the risks of accidents and their consequences.

The operator proposes to construct a soak-away system. Rain and storm water collected on site will be tested and validated prior to discharge to the attenuation tank and soak-away. The design of the soak-away system is still at the draft stage. We have included a Pre-operational Condition 3 (POC 3)

which requires the submission of the final design of the soak-away system and site drainage plan prior to commissioning using waste.

### 3. Environmental Management System

We are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the operator to ensure compliance with all the permit conditions. The operator has stated that they will work towards an Environmental Management System (EMS) that will be certified under ISO14001. A Pre-operational Condition 4 (POC 4) has been included requiring the submission of the site EMS to the Environment Agency prior to commissioning of the installation using waste and to make available for inspection all EMS documentation.

### 4. Emissions of impact on air quality

Emissions to air will be from the following plant:

- Combustion plant (consisting a combined heat and power (CHP) engine, boiler and emergency flare); and
- Biogas upgrading plant

#### Human receptors

The operator submitted an H1 assessment to consider the impact of air emissions from the facility. The following table shows the H1 results of nitrogen dioxide and carbon monoxide emissions (human health):

Pollutant	EQS / EAL	Process Contribution (PC)		PC > 1% LT or 10% ST?
	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	% of EAL	
NO <sub>2</sub> (annual)	40	1.01	2.52	Yes
NO <sub>2</sub> (1-hour)	200	12.1	6.04	No
CO (8-hour)	10,000	18.0	0.18	No

From the table above, nitrogen dioxide (long term) does not screen out as insignificant, in that process contributions are >1% of the long term EQS/EAL. Emissions of nitrogen dioxide (short term) and carbon monoxide screen out as insignificant, in that process contributions are <10% of the short term EQS/EAL.

We have examined the background concentrations of nitrogen dioxide and consider that the predicted environmental concentration (PEC) is less than 70% of the long term EQS/EAL. We conclude that emissions of nitrogen dioxide are unlikely to have a significant impact on human health.

#### Ecological receptors

The following European habitat sites are located within 10 km of the Installation:

- Breckland (SAC and SPA)

- Waveney & Little Ouse Valley Fens (SAC)

The following Sites of Special Scientific Interest (SSSI) are located within 2 km of the Installation:

- Breckland Farmland
- Barnham Heath

The following local wildlife sites are located within 2 km of the Installation:

- Euston Park
- River Blackburn Meadow
- Euston Estate Grazing Meadow
- Ashfen Carr Heath and Tracks
- Euston Churchyard
- Euston Estate Quarry

The operator considered the impact of nitrogen dioxide emissions on ecological receptors. The following table shows the H1 results of nitrogen dioxide emissions (ecological receptors):

Pollutant	EQS / EAL	Process Contribution (PC)		PC > 1% LT or 10% ST?
	$\mu\text{g}/\text{m}^3$	$\mu\text{g}/\text{m}^3$	% of EAL	
NO <sub>2</sub> (annual)	30	0.26	0.87	No
NO <sub>2</sub> (daily)	75	3.26	4.34	No

From the table above, nitrogen dioxide screens out as insignificant, in that process contributions are <1% of the long term EQS/EAL and <10% of the short term EAQ/EAL.

The combustion process at the installation (1.48 MW aggregated thermal input) is not considered “*relevant*” for assessment under the Environment Agency’s procedures which cover the Conservation Regulations 1994 (Habitats Regulations). This was determined by referring to the Environment Agency’s guidance “AQTAG014 – *Guidance on identifying ‘relevance’ for assessment under the Habitats Regulations for the installations with combustion processes*”. Thus no detailed assessment of the effect of the releases from the installation’s combustion processes on Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites is required.

The Environment Agency also considers that emissions are not likely to cause significant impact on the SSSI and non-statutory sites given the size of the process contribution which is a small fraction of the critical level/load and the size of the combustion plant (CHP engine and boiler). Therefore no further assessment is necessary.

The emissions (NO<sub>2</sub> and CO) from the CHP engine and boiler were derived from the manufacturer's data and not based on real-time operational monitoring data. No quantification of emissions (H<sub>2</sub>S, SO<sub>2</sub> and VOCs) from the CHP engine, boiler and upgrading plant was provided with the Application. The operator proposes to process 90% of the biogas produced via the upgrading plant while 10% of the biogas is fed to the CHP engine and boiler (for site energy requirements).

We consider it appropriate to include Improvement Conditions 1a and 2a which require the operator to undertake a monitoring survey following the commissioning of the installation (using waste) to obtain actual (real-time) operational monitoring data from the CHP engine, boiler and biogas upgrading plant.

Improvement Conditions 1b and 2b require the operator to undertake an air emissions impact assessment (H1 software tool) using the results of the monitoring survey and compare the long and short term impacts of pollutants in accordance with the Environment Agency Guidance Note H1, Annex F – Air emissions. Following the review of the results from the monitoring survey and impact assessment, the Environment Agency shall consider whether emission limits are appropriate at emission points A2, A3 and A4. In the event the emission limits are considered not necessary, the use of surrogate monitoring shall be employed.

## 5. Assessment of impact of odour

The operator submitted an odour impact assessment to address odour emissions from the facility. Odour emissions were modelled using the air quality modelling software, ADMS (version 4.2). The identified odour sources include air from the maize silage clamp, feeding hoppers, digesters, digestate separator, biogas storage, CHP engine and liquid digestate storage tanks. Results from the odour modelling for the closest residential receptors are presented in the Table below.

Sensitive Receptors	Modelled odour concentration (C <sub>98 1 hour</sub> ou <sub>E</sub> /m <sup>3</sup> )
Receptor 1 (Home Farm)	3.22
Receptor 2	1.60
Receptor 3	1.19
Odour criterion – 3.0 ou <sub>E</sub> /m <sup>3</sup> for moderately offensive odours	

The results show that the indicative criterion for moderately offensive odours (3.0 ou<sub>E</sub>m<sup>-3</sup>) was exceeded marginally only at Receptor 1 (Home Farm employee). The operator considers that the emissions from the facility are unlikely to give any reasonable cause for annoyance due to odour as the modelling is based on a worst case scenario (*emission rate data greater than reported measured data have been applied to the modelling*). The Environment Agency assessed the odour modelling and our results are in agreement with those of the operator. This is based on the plant operating at the parameters quoted in the modelling report.

### Storage and handling of feedstock/waste – silage clamp

The operator reports that the silage clamps will be covered when not in use to ensure that rainwater and oxygen are kept out and any odours generated are kept in. Silage will be removed from the clamp on a daily basis by removing a small section of the clamp cover to reveal a working face from which silage can be cut. The material will only be exposed to the atmosphere during cutting after which the cover will be replaced. Only a small surface area of ensiled material will be exposed to air at any one time. Silage cutting activities will be performed for short, intermittent, periods only. The haul distance between the clamp and the digesters is short; therefore the freshly disturbed silage in the loader bucket will be exposed to the air for only a short time period. In effect, odours will be controlled by the very limited surface area of materials exposed to the atmosphere in the feed hoppers and by the fact that the feed hoppers will deliver material directly into the digesters through a fully enclosed conveyor system that will serve to contain odour emissions.

The operator reports that effluent generated within the silage clamp will drain to a leachate tank and will subsequently be transferred into the digesters through a sealed system.

### Separation of whole digestate

Separation of digestate will be undertaken in a screw press separator. The separator will expel the solid fibrous material while retaining the liquid portion. The operator reports that liquid digestate is retained in an enclosed pumping system, which will reduce odour emissions. The solid fraction of the digestate is collected in a skip located below the separator for removal off-site.

### Biogas upgrading plant

The operation of the biomethane upgrading facility will result in the release of hydrogen sulphide (H<sub>2</sub>S) and VOCs which have the potential to create odour emissions. The operator has proposed to abate pollutants from the upgrading process by using a carbon filter (to trap the pollutants in the exhaust gas) prior to their release. We consider the proposed odour abatement to be Best Available Techniques (BAT) at this facility provided that the operation of the carbon filters demonstrate its effectiveness in abating the impact of odour.

### Odour management plan

The operator submitted an odour management plan (OMP) as part of this application. The Environment Agency assessed the OMP and consider that there are some areas of the plan that require further revision. The operator's management of odour at the facility relies on house-keeping measures such as management of the silage clamp, use of odour abatement (carbon filters) at the biogas upgrading plant and the remote location of the facility.

The measures proposed by the operator do not comply with the current BAT for biological treatment facilities (*see Section 4.2.2 of BAT Reference Note for Waste Treatment, which requires a robust containment feature and air extraction to an abatement system*). However, we have considered that the facility will process only agricultural material via AD, therefore the odour risks

may be regarded as “moderately offensive” compared to an AD facility processing municipal and/or food and animal waste.

We note that no odour abatement has been proposed for the separation of whole digestate at the facility. We consider that there is likelihood of odour emissions from this activity. Our experience of regulating these facilities indicates odours associated with this separation technique. Where this is the case, we have required the installation of odour abatement for this activity. The operator proposes to re-assess odour emissions from the facility following the commissioning of the installation. We consider that the operator should propose contingency measures in the revised plan, which will be implemented in the event of failure of proposed measures and odour complaints.

We are not satisfied with the content of the facility’s OMP, therefore we have included a Pre-operational Condition 5 (POC 5) in the permit which requires the operator to submit a revised OMP that addresses the Environment Agency’s comments in the review document (24 March 2015), prior to the commencement of commissioning using waste. Improvement Condition 3 (IC3) requires the operator to review the effectiveness of the OMP following Environment Agency approval.

We consider that the conditions in the permit are sufficient to ensure that odour emissions from the facility do not cause annoyance. Process monitoring conditions including weekly sniff tests at the site boundary will also ensure that emissions of odour are not causing annoyance. In the event that odour emissions are causing pollution, the permit conditions require the operator to comply with the measures specified in the site’s operating techniques and odour management plan (following approval).

This permit does not authorise the spreading of digestate (solid or liquid) from this facility on land. The spreading of digestate on land is subject to a separate permit of which an application must be submitted by the operator.

#### **6. Waste qualification – technically competent manager (TCM)**

The operator is a legal entity and has appropriate level of control and decision-making with regard to the facility and its operations. There are no recorded convictions and/or relevant offences lodged against the operator. Our National Enforcement Database has been checked and shows no relevant convictions.

The operator has registered two site employees to obtain the necessary waste qualifications (WAMITAB Level 4 Certificate in Waste and Resource Management). A Pre-operational Condition (POC 6) has been included in the permit which requires the operator to provide evidence of technical competence for the AD and biogas upgrading operations prior to commissioning using waste.

#### **7. Accident management plan**

The operator submitted an environmental risk assessment with the Application which outlined possible risks from the operation of the facility and



control measures. The Environment Agency considers that a detailed Accident Management Plan for the site should be developed which details appropriate measures to be taken to ensure that accidents that may cause pollution are prevented and that, if they should occur, their consequences are minimised. An Accident Management Plan will form part of the Environmental Management System and must be in place prior to commissioning using waste as required by Pre-operational Condition 7 (POC 7).

## 8. Monitoring and compliance

We have specified that monitoring should be carried out for the parameters listed in Schedule 3 in the permit. These monitoring requirements have been imposed in order to demonstrate compliance with emission limit values and permit conditions.

### Air quality monitoring

We have not specified monitoring of the CHP engine, boiler and biogas upgrading plant until Improvement Conditions (IC1a, 1b, 2a and 2b) are completed.

We have specified in the permit that emissions testing on the emergency flare should be undertaken 12 months following commissioning and then in the event the flare has been operational for over 10% of the year (876 hours). Guidance for monitoring enclosed landfill gas flares (LFTGN 05) sets out the emission standards for enclosed gas flares (see Table below). Annual monitoring of emissions (Table S3.1 in the permit) from the emergency flare will be undertaken by MCERTS accredited personnel using MCERTS approved methods.

Parameter	Emission standard (mg/m <sup>3</sup> )
Oxides of nitrogen as NO <sub>2</sub>	150
Carbon monoxide	50
Total volatile organic compounds	10

### Surface water monitoring

We have specified weekly visual monitoring of uncontaminated site surface water and monthly monitoring of site surface water from the bunded area. This is to ensure early detection of contaminated water entering groundwater via the soak-away (see Table S3.2 in the permit).

### Groundwater monitoring

We have specified annual and monthly monitoring of groundwater sampling due to the shallow groundwater levels underneath the site. The monitoring is to ensure that the facility is not having any impact on groundwater integrity (see Table S3.3 in the permit).

### Process monitoring

We have specified monitoring of the AD process as a whole (see Table S3.4 in the permit). This includes monitoring of key digestion parameters, daily olfactory checks and structural integrity checks of the digesters and storage

tanks. These monitoring checks are included to ensure that any malfunction of plant/equipment on site are detected early to reduce serious pollution.

## Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit.

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Consultation</b>		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	The web publicising and consultation responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
<b>Operator</b>		
Control of the facility	We are satisfied that the operator is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 - Understanding the meaning of operator.	✓
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
<b>The site</b>		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.	✓
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive (IED) – guidance and templates (H5).	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. We have not formally consulted on the application. The decision was taken in accordance with our guidance, AQTAG014 – <i>Guidance on identifying ‘relevance’ for assessment under the Habitats Regulations for the installations with combustion processes.</i>	✓
<b>Environmental Risk Assessment and operating techniques</b>		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory. The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally insignificant.	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes - [IPPC Sector Guidance Note <i>EPR 1.01 – Combustion Activities</i>; IPPC Sector Guidance Note <i>IPPC S5.06 – Guidance for the Recovery and Disposal of Hazardous and Non-Hazardous Waste</i>; <i>How to Comply with Your Environmental Permit and H4 – Odour Management</i>].</p> <p>The proposed techniques/emission levels for priorities for control are in line with the benchmark levels contained in the above technical guidance notes and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions, and ELVs deliver compliance with BAT-AELs.</p> <p>Key measures proposed by the operator include:</p> <ul style="list-style-type: none"> <li>• pre-acceptance of waste procedures</li> <li>• acceptance of waste procedures</li> <li>• storage of waste</li> <li>• treatment of waste</li> <li>• point source emissions to air, surface water and groundwater</li> <li>• fugitive emissions to air, surface and ground water</li> <li>• noise</li> </ul>	✓
<b>The permit conditions</b>		
Raw materials	We have specified limits and controls on the use of	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	energy crops to ensure that the feedstock going into the digesters are free from contraries such as plastics and metals which may impede the digestion process.	
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. We are satisfied that the operator can accept permitted wastes because they have the necessary infrastructure, operating systems and technical capability to manage these wastes in an appropriate manner. The site is permitted to accept two waste types (EWC 02 01 03 – plant tissue waste and 02 01 06 – animal manure) for treatment by anaerobic digestion.</p> <p>The wastes types can be treated via anaerobic digestion as they are included in the revised Anaerobic Digestate Quality Protocol (ADQP) and in the Environment Agency biowaste treatment permit templates for standard rules facilities.</p> <p>We made these decisions with respect to waste types in accordance with our Technical Guidance Note – <i>Framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment.</i></p>	✓
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions. See Key Issues section for more details.	✓
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions. See Key Issues section for more details.	✓
Incorporating the application	We have specified that the operator must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques table in the permit.	✓
Emission limits	We have not set any emission limits for the CHP engine (0.58 MW), boiler (0.9 MW) and biogas upgrading plant until the Improvement conditions (IC1a, IC1b, IC2a and IC2b) are completed. See Key Issues section for more details.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to demonstrate compliance with the conditions of the permit for operations requiring the management of air emissions. We made these decisions in accordance with the <i>Guidance for monitoring enclosed landfill gas flares</i> (LFTGN 05) which is considered the most appropriate TGN for this activity.</p> <p>We have not set any monitoring requirements for the CHP engine, boiler and biogas upgrading plant until the Improvement conditions (IC1a, IC1b, IC2a and IC2b) are completed.</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>	✓
Reporting	<p>We have specified reporting in the permit. As the monitoring of point source emissions to air is only required annually, reporting is also required annually. We consider that the monthly and quarterly reporting of emissions to water and groundwater is appropriate due to the sensitive location of the site.</p> <p>Reporting forms have been prepared to facilitate reporting of data in a consistent format. These reporting requirements are deemed sufficient and proportional for the Installation. We made these decisions in accordance with our guidance <i>How to Comply with your Environmental Permit</i>.</p>	✓
<b>Operator Competence</b>		
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓
Technical competence	Technical competency is required for activities permitted. The operator has registered to obtain appropriate	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	qualifications for the operations on site. See Key Issues section for more details.	
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.	✓
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

## Annex 2: Consultation and web publicising responses

The Application has been advertised and consulted upon in accordance with the Environment Agency's Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our decision is summarised in this Annex. Copies of all consultation responses have been placed on the Environment Agency Public Register.

The Application was advertised on the Environment Agency website from 10/12/2014 to 13/01/2015. Copies of the Application were placed in the Environment Public Register at Environment Agency, Brampton Office, Bromholme Lane, Brampton, Huntingdon, PE28 4NE.

The following organisations were consulted:

- Animal Health
- Director of Public Health
- Public Health England
- Suffolk Fire & Rescue Service
- St Edmundsbury Borough Council (Environmental Health Department)
- St Edmundsbury Borough Council (Planning Department)
- National Grid
- Health & Safety Executive

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

<b>Response received from Fire &amp; Rescue Service dated 15/12/14</b>	
Brief summary of issues raised:	Summary of action taken / how this has been covered
Recommendation that the Environment Agency considers access to fire vehicles and water for fire fighting under the Approved Document B for Building Regulations.	Consideration of access for fire vehicles is a matter for the Local Authority and is not relevant under the Environmental Permitting Regulations. We have included a pre-operational condition which requires the operator to submit an Accident Management Plan for the facility prior to commissioning using waste.

<b>Response received from Public Health England dated 06/01/15</b>	
Brief summary of issues raised:	Summary of action taken / how this has been covered
1. PHE recommends that the environmental permit should contain conditions to ensure that emissions to air and odours arising from point sources, storage and handling of feedstock, waste and digestate do not impact upon public health.	1. Emissions to air from the facility and their potential impacts are discussed in this document. We assessed the operator's air quality assessment using the H1 software tool and set improvement conditions to obtain real-time operational data. We have included permit conditions addressing

<p>2. PHE recommends that the Environment Agency should ensure that an Accident Management Plan is developed for the site which considers all potential hazards including those associated with the biogas.</p> <p>3. PHE recommends that the Environment Agency should encourage the Applicant to complete an assessment of local air quality using data inputs from published literature or information from other similar facilities prior to issuing the permit.</p> <p>4. PHE recommends that the Applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice.</p> <p>5. PHE recommends that the Environment Agency should consult the Local Authority, Food Standards Agency and the Director of Public Health during the determination of application.</p>	<p>noise (condition 3.4), odours (condition 3.3) and waste handling (conditions 1.4 and 2.3) in the permit.</p> <p>2. We have included a Pre-operational Condition (POC 7) in the permit which requires the operator to submit an Accident Management Plan prior to the commissioning of the installation using waste.</p> <p>3. We assessed the operator's air quality assessment using the H1 software tool. We do not consider that there will be a significant impact on human and ecological receptors due to the size of the CHP engine and boiler (aggregated thermal input of 1.4 MW). Upgrading of biogas to biomethane is a relatively new technique in the AD industry sector, with no available emissions input data. We have therefore set improvement conditions (IC1a, 1b, 2a and 2b) to obtain real-time operational data for use in assessment of impact at nearby receptors. We have used this approach for this industry sector.</p> <p>4. Operating Techniques is addressed in this decision document (see page 11).</p> <p>5. We consulted the Local Planning Authority, the Local Authority's Environmental Protection Department, Health and Safety Executive, Animal Health, the Director of Public Health and Members of the Public during the determination of this application. A summary of the responses is provided in this decision document. We have not consulted the Food Standards Agency in accordance with our Working Together Agreement.</p>
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**No responses received from**

Animal Health

Director of Public Health

St Edmundsbury Borough Council (Environmental Health Department)

St Edmundsbury Borough Council (Planning Department)

National Grid

Health & Safety Executive

Members of the Public