

# Environment Agency permitting decisions

## Bespoke Variation

We have decided to issue the variation for Acornfield Road Waste Management Centre operated by Future Industrial Services Limited

The variation number is [EPR/VP3936UG/V006](#)

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

This application is for a substantial variation to an existing permit in order to incorporate the following changes:

Increase in capacity of the waste transfer station, from 780 tonnes to 2,548 tonnes per annum.

Addition of a number of waste types,

Increase in capacity of the oil/water treatment plant from 80 to 200 tonnes per day,

Installation of an Oil Recovery Unit (ORU), a distillation plant having a capacity of 48,000 cubic metres per annum, incorporating a flash evaporator, wiped film evaporators, a clean up section using n-methylpyrrolidone and zeolite polishing. A thermal oxidiser (defined as a small waste incineration plant (SWIP)) is included, burning waste distillate fuel from the flash evaporator and recovering heat in a thermal fluid heater which will provide heat to the distillation plant.

Emission limits have been imposed on the exhaust from the SWIP in accordance with the IED. The SWIP is a co-incinerator as defined in the IED burning only liquid waste fuel for heat recovery. ELVs have been set at 3% oxygen as specified in IED for liquid fuels.

The SWIP has a wet scrubber to abate the emissions from the exhaust to air. This is considered to be BAT in this case because the distillate fuel has very low solids and metals content and meets the specification for Recovered Fuel Oil, except for the S and Cl. The acid gases from the combustion of the S and Cl can be easily removed in a wet scrubber. Emission limits for the release of the scrubber effluent have been set in accordance with the IED. As the effluent is discharged to an on-site treatment plant where it is treated with the effluent from other activities, the IED requires the ELVs to be imposed on the discharge to sewer from the effluent treatment plant and to be based on a mass balance calculation. This requires monitoring of all effluent flows into the treatment plant.

Condition 3.2.3 has been added in order to implement the requirements of the Industrial Emissions Directive (IED) which sets minimum periods for monitoring of soil and groundwater for existing installations from 7<sup>th</sup> January 2014 (unless such monitoring is based on a systematic appraisal of the risk of contamination).

H1 screening was used to assess the impact of emissions from the scrubber exhaust from the SWIP in the ORU.

The maximum ground level concentrations of the emissions of NO<sub>2</sub>, cadmium, manganese, nickel and arsenic are above 1% of the long Environmental Assessment Level (EAL).

The maximum ground level concentrations of the emissions of PM<sub>10</sub>, vanadium, hydrogen fluoride, SO<sub>2</sub>, and NO<sub>2</sub> are above 10% of the short term EAL.

These emissions were taken to the stage 2 screening where they are assessed against the Predicted Environmental Concentrations (PEC). Arsenic was above the threshold of a PEC >70% of the long term EAL.

PM<sub>10</sub>, hydrogen fluoride, SO<sub>2</sub> and NO<sub>2</sub> were above the threshold of a % PC of the headroom between EAL and the background concentration for short term EALs.

H1 is a conservative screening tool and is expected to give conservatively high results and in addition the modelling has been undertaken based on emissions at the ELVs as required by the IED.

The operator has carried out more detailed dispersion modelling using ADMS 5 which is an appropriate model for this application.

The detailed modelling showed no breaches of long term or short term EALs for dust, TOC, HCl, HF, CO, SO<sub>2</sub>, NO<sub>x</sub> and metals except for arsenic and chromium vi. The arsenic and chromium vi emissions have been calculated at 100% of the total metals limit (in accordance with normal practice). Following advice from the Environment Agency the arsenic and chromium vi emissions were modelled at 11% of the total metals ELV, which is accepted as a more realistic basis for the assessment and on this basis there is no exceedence of any EAL.

We have included improvement conditions to implement the requirements of Ch IV of the IED in the permit and these are explained in the following table.

Table S1.3 Improvement programme requirements			
Reference	Requirement	Justification	Date
<b>IC1</b>	<p>The Operator shall submit a written proposal to the Environment Agency to carry out tests to determine the size distribution of the particulate matter in the exhaust gas emissions to air from emission point A8, identifying the fractions within the PM<sub>10</sub>, and PM<sub>2.5</sub> ranges. The proposal shall include a timetable for approval by the Environment Agency to carry out such tests and produce a report on the results.</p> <p>On receipt of written agreement by the Environment Agency to the proposal and the timetable, the Operator shall carry out the tests and submit to the Environment Agency a report on the results.</p>	<p>The environmental impact of particulate matter is dependent upon the size of the particles. This Improvement Condition requires proposals for the measurement of the size distribution of the particulate matter that will enable a more accurate assessment of the impacts from the emissions of particulate matter.</p>	<p>Within 6 months of the completion of commissioning.</p>
<b>IC2</b>	<p>The Operator shall submit a written report to the Environment Agency on the commissioning of the Oil Recovery Unit. The report shall summarise the environmental performance of the plant as installed against the design parameters set out in the Application. The report shall also include a review of the performance of the facility against the conditions of this permit and details of procedures developed during commissioning for achieving and demonstrating compliance with permit conditions.</p>	<p>This is a condition intended to ensure that the incinerator meets its design parameters and identify areas where emission standards can be further improved by the application of BAT.</p>	<p>Within 4 months of the completion of commissioning.</p>
<b>IC3</b>	<p>The Operator shall carry out checks to verify the residence time, minimum temperature and oxygen content of the exhaust gases in the furnace whilst operating under the anticipated most unfavourable operating conditions. The results shall be submitted in writing to the Environment Agency.</p>	<p>This condition is imposed in order to confirm the results of the CFD modelling and is required under para 2.2 of Part 6 of Annex VI of the IED.</p>	<p>Within 4 months of the completion of commissioning.</p>
<b>IC4</b>	<p>The Operator shall submit a written report to the Environment Agency describing the performance and optimisation of the combustion settings to minimise oxides of nitrogen (NO<sub>x</sub>) emissions within the</p>	<p>The application proposes the use of flue gas recirculation together with a low NOX burner to minimise the emissions of NOX. This condition is imposed to ensure that the correct optimisation of the burner and FRG</p>	<p>Within 4 months of the completion of commissioning.</p>

Table S1.3 Improvement programme requirements			
Reference	Requirement	Justification	Date
	<p>emission limit values described in this permit with the minimisation of nitrous oxide emissions. The report shall include an assessment of the level of NO<sub>x</sub> and N<sub>2</sub>O emissions that can be achieved under optimum operating conditions.</p> <p>The report shall also provide details of the optimisation (including dosing rates) for the control of acid gases and dioxins.</p>	settings has been carried out	
<b>IC5</b>	<p>The Operator shall carry out an assessment of the impact of emissions to air of the following component metals subject to emission limit values, i.e. Cd, Tl, Hg, Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V. A report on the assessment shall be made to the Environment Agency.</p> <p>Emissions monitoring data obtained during the first year of operation shall be used to compare the actual emissions with those assumed in the impact assessment submitted with the Application. An assessment shall be made of the impact of each metal against the relevant EQS/EAL. In the event that the assessment shows that an EQS/EAL could be exceeded, the report shall include proposals for further investigative work.</p>	<p>In this case the impact assessment has been carried out at the ELVs. The results of this revised assessment will enable consideration to be given to further reductions of the ELVs based on BAT.</p>	15 months from commencement of operations
<b>IC6</b>	<p>The Operator shall submit a written summary report to the Agency to confirm by the results of calibration and verification testing that the performance of Continuous Emission Monitors for parameters as specified in table S3.1 and table S3.1(a) complies with the requirements of BS EN 14181, specifically the requirements of QAL1, QAL2 and QAL3.</p>	<p>Calibrated CEMS are needed to demonstrate compliance with ELVs set in order to meet the requirements of the Waste Incineration Directive, or lower limits should this prove to be BAT for the Installation. BS EN 14181 is the relevant standard against which the CEMS should be calibrated and this requires the report requested to be submitted within one year</p>	<p>Initial calibration report to be submitted to the Agency within 3 months of completion of commissioning.</p> <p>Full summary evidence compliance report to be submitted within 18 months of commissioning.</p>
<b>IC7</b>	<p>The Operator shall submit the written protocol referenced in condition 3.2.3 for the monitoring of soil and groundwater for approval by the Environment Agency. The protocol</p>	<p>This condition is imposed to ensure that an appropriate protocol is available to meet the monitoring requirements of the IED.</p>	Within 12 months of the date of this permit.

Table S1.3 Improvement programme requirements			
Reference	Requirement	Justification	Date
	<p>shall demonstrate how the Operator will meet the requirements of Articles 14(1)(b), 14(1)(e) and 16(2) of the IED.</p> <p>The procedure shall be implemented in accordance with the written approval from the Agency.</p>		
<b>IC8</b>	<p>The operator shall submit to the Environment Agency for agreement a proposed method statement detailing the proposed techniques for the repackaging of bulk wastes within the transfer station including repackaging of packages to bigger packages and packages to road tanker, in accordance with SGN S5.06</p> <p>The procedure shall be implemented in accordance with the written approval from the Agency.</p>	<p>The techniques used under the existing permit require more detailed specification.</p>	<p>Within 3 months of the date of this permit.</p>
<b>IC9</b>	<p>The operator shall submit to the Environment Agency for agreement a proposed method statement detailing the proposed techniques for handling waste laboratory smalls within the transfer station in accordance with SGN S5.06</p> <p>The procedure shall be implemented in accordance with the written approval from the Agency.</p>	<p>The techniques used under the existing permit require more detailed specification.</p>	<p>Within 3 months of the date of this permit.</p>
<b>IC10</b>	<p>The operator shall submit to the Environment Agency proposals for the upgrading and use of Area 1 in accordance with SGN S5.06</p>	<p>The condition of the bunding and infrastructure in this area requires improvement.</p>	<p>Within 3 months of the date of this permit.</p>

We have included Pre-operational conditions in the permit and these are explained below.

Table S1.4 Pre-operational measures		
Reference	Pre-operational measures	Justification
<b>PO1</b>	Prior to the commencement of commissioning of the Oil Recovery Unit, the Operator shall send a report to the Environment Agency which will contain a comprehensive review of the options available for utilising the heat generated by the waste incineration process in order to ensure that it is recovered as far as practicable. The review shall detail any identified proposals for improving the recovery and utilisation of waste heat and shall provide a timetable for their implementation.	This is a standard condition required to meet the requirements of Article IV of the IED.
<b>PO2</b>	Prior to the commencement of commissioning of the Oil Recovery Unit; the Operator shall provide a written commissioning plan, including timelines for completion, for approval by the Environment Agency. The commissioning plan shall include the expected emissions to the environment during the different stages of commissioning, the expected durations of commissioning activities and the actions to be taken to protect the environment and report to the Environment Agency in the event that actual emissions exceed expected emissions. Commissioning shall be carried out in accordance with the commissioning plan as approved.	This condition enables the Environment Agency to ensure that the commissioning is carried out with minimum risk of pollution.
<b>PO3</b>	After completion of furnace design and at least three calendar months before any furnace operation; the operator shall submit a written report to the Agency of the details of the computational fluid dynamic (CFD) modelling. The report shall demonstrate whether the design combustion conditions comply with the residence time and temperature requirements as defined by Chapter IV and Annex VI of the IED.	This is required to ensure that the design can achieve the IED requirements.
<b>PO4</b>	At least three months before operation of the Oil Recovery Unit, the Operator shall submit a written	This condition is required to ensure that the operator has adequate systems in place for the monitoring of waste water from the exhaust

Table S1.4 Pre-operational measures		
Reference	Pre-operational measures	Justification
	<p>report to the Environment Agency specifying arrangements for continuous and periodic monitoring of emissions to sewer to comply with the requirements of Articles 8, 11 and Annex IV of the Industrial Emissions Directive. The report shall include the following:</p> <ul style="list-style-type: none"> <li>• Plant and equipment details, including accreditation to MCERTS (as appropriate) unless otherwise agreed in writing by the Environment Agency.</li> <li>• Methods and standards for sampling and analysis</li> <li>• Details of monitoring locations, access and working platforms</li> </ul>	scrubber.
<b>PO5</b>	<p>At least three months before operation of the Oil Recovery Unit,, the Operator shall submit a written report to the Environment Agency specifying arrangements for continuous and periodic monitoring of emissions to air to comply with Environment Agency guidance notes M1 and M2. The report shall include the following:</p> <ul style="list-style-type: none"> <li>• Plant and equipment details, including accreditation to MCERTS</li> <li>• Methods and standards for sampling and analysis</li> <li>• Details of monitoring locations, access and working platforms.</li> </ul>	This condition is required to ensure that the operator has adequate systems in place for the monitoring of emissions to air..
<b>PO6</b>	<p>The operator shall submit a report demonstrating that all bulk liquid storage tanks, pipelines and secondary containment have been leak-tested at least 4 weeks before the start of operations.</p>	This condition is required to ensure that adequate testing has taken place in order to minimise the risk of spillages.
<b>PO7</b>	<p>At least 3 months before commencement of sludge bulking activities in Area 1 the operator shall submit a method statement, including proposals for upgrading of the infrastructure, to the Environment Agency for agreement . The procedure shall be implemented in accordance with the written</p>	This condition is required to ensure that the infrastructure in Area 1 is adequate to protect the environment before this activity takes place.

Table S1.4 Pre-operational measures		
Reference	Pre-operational measures	Justification
	approval from the Agency.	

### Chlorinated Oils

The existing permit allows for the acceptance of chlorinated oils:

12 01 06\*

12 01 08\*

13 01 04

13 01 09

13 02 04

The permit allows the treatment of these in the Oil Recovery Unit. The operator imposes a maximum limit of 3% on the chlorine content of these wastes.



## Annex 1: decision checklist

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

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>Receipt of submission</b>		
Confidential information	No claim for commercial confidentiality has been made	✓
Identifying confidential information	We have not identified any information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
<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. The application has been advertised on our website. We have consulted with the following: The Local Authority-Knowsley Metropolitan Borough Council (KMBC) Director of Public Health-KMBC The Food Standards Agency The Health and Safety Executive Public Health England The Local Fire Service-Merseyside Fire and Rescue Service	✓
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 applicant (now 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.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The facility</b>		
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application, including: Industrial Emissions Directive Waste Framework Directive	✓
<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	There is a minor change to the area of the site as a result of this application. Two areas previously separated by a roadway have been joined to include the roadway between them. The operator has provided a description of the condition of the site which includes the newly included roadway. We have consulted with the Environment Agency CGWCL section who have recommended: 1 The operator should complete remediation work associated with the spill which occurred in 2008, including the repair of damaged drainage. IC8 requires the operator to complete this work within 6 months. PO7 requires the operator to complete this work before the commencement of operation of the ORU. 2 Baseline site conditions should be those at the time the permit was first issued. Although not specified in the permit this is clearly stated in the regulations and will be confirmed in writing to the operator by the area team. 3 Detailed drawing of site drainage system is required. This has been provided in response to the Sch-5 notice.	✓
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 . There is one Local Nature Reserve within 2 km of the installation, Acornfield Plantation. There are seven Local Wildlife sites within 2 km of the installation, Brown Birches, Charley Wood, Acornfield Plantation, Otis Meadow, Mosslands, Kirkby Brook and Moss Plantation.	✓

Aspect considered	Justification / Detail	Criteria met Yes
	<p>We have not formally consulted on the application. The decision was taken in accordance with our guidance. A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites.</p> <p>All documents have been saved on the Environment Agency's Electronic Data Records Management system (EDRM).</p>	
<b>Environmental Risk Assessment and operating techniques</b>		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment is detailed in the Key Issues section above.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment all emissions may be categorised as environmentally insignificant.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes:</p> <p>How to comply with your Environmental Permit Environment Agency Guidance H1 Infrastructure and Bunds in accordance with CIRIA 736 Environment Agency- Environmental permitting for waste treatment and storage. SGN 5.06-Guidance for the recovery and disposal of hazardous and non-hazardous waste. Chemical warehousing: The storage of packaged dangerous substances HSG71 The storage of flammable liquids in containers-HSG51</p> <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN 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>We consider that the emission limits included in the installation permit reflect the BAT for the sector.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The permit conditions</b>		
Updating permit conditions during consolidation.	We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s). The operator has agreed that the new conditions are acceptable.	✓
Raw materials	We have specified limits and controls on the use of raw materials and fuels. The composition of the waste fuel is specified in the application. We have imposed maximum limits for the concentration of sulphur and chlorine.	✓
Waste types	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 these wastes for the following reasons: The waste types are similar to those already included within the existing permit. The waste fuel oil only differs from the specification for recovered fuel oil in respect of the concentration of chlorine and sulphur. The products of combustion of chlorine and sulphur containing compounds will be removed in the wet scrubber. The permit includes limits on the concentration of chlorine and sulphur. We have excluded the following wastes for the following reasons; 13 08 99* This classification is not considered to be sufficiently prescriptive.	✓
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions as set out in the Key Issues section above.	✓
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions as set out in the Key Issues section above.	✓
Incorporating the application	We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>See key issues section</p> <p>The following substances have been identified as being emitted in significant quantities and ELVs and equivalent parameters or technical measures have been set for those substances.</p> <p>The substances are those specified for monitoring in the IED.</p> <p>Particulate matter  Total Organic Carbon (TOC)  Hydrogen chloride  Hydrogen fluoride  Carbon monoxide  Sulphur dioxide  Oxides of nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>)  Cadmium &amp; thallium and their compounds (total)  Mercury and its compounds  Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V and their compounds (total)  Dioxins / furans (I-TEQ)  Dioxins / furans (WHO-TEQ Humans / Mammals)  Dioxins / furans (WHO-TEQ Fish)  Dioxins / furans (WHO-TEQ Birds)  Dioxin-like PCBs (WHO-TEQ Humans / Mammals)  Dioxin-like PCBs (WHO-TEQ Fish)  Dioxin-like PCBs (WHO-TEQ Birds)</p> <p>It is considered that the numeric limits described below will prevent significant deterioration of receiving waters. We have imposed numeric limits because either a relevant environmental quality or operational standard requires this. The monitoring and limits are those specified in the IED for an incinerator with a wet scrubber used to abate emissions from an incinerator or co-incinerator plant.</p> <p>In the case of this facility where the aqueous effluent from the scrubber is treated with other effluent in a common treatment plant, the IED requires the limits to be imposed on the discharge from the treatment plant. The operator is</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	required to monitor all individual flows into the treatment plant and to calculate the final discharge concentrations which are attributed to the flow from the scrubber discharge by means of a mass balance.	
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 protect the environment and meet the requirements of the IED.</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.</p> <p>We made these decisions in accordance with the requirements of the IED.</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 is a member of an agreed scheme.	✓
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.	

Aspect considered	Justification / Detail	Criteria met
		Yes
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.

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

Response received from
Health and Safety Executive
Brief summary of issues raised
No specific issues raised. Confirmed HSE is responsible for enforcing health and safety legislation for the site.
Summary of actions taken or show how this has been covered
No action required.

Response received from
Public Health England
Brief summary of issues raised
Pointed out evidence of cracked concrete in Area 3. Pointed out evidence of cracked drains. Pointed out need for replacement of bunded tanks. Recommended permit to have conditions to ensure emissions to sewer do not have the potential to impact on public health.
Summary of actions taken or show how this has been covered
Area 3 to be re-concreted. Cracked drains to be repaired. New tanks will be installed and all tanks and bunding will be upgraded. The permit includes the ELVs from the Industrial Emissions Directive appropriate for an incinerator installation.

Response received from
Knowsley Metropolitan Borough Council
Brief summary of issues raised
Knowsley Public Health Team is concerned about; 1 a significant increase in the capacity of the oil/water treatment plant by 2.5 times (from 80 to 200 tonnes per day) 2 a significant increase in storage of waste codes R1 to R12 by 4 times current capacity (25,000 to 100,000 tonnes per annum). 3 increased emissions to air and odours from the site. 4 concentrations of NO <sub>x</sub> and HF are predicted to exceed the relevant EAL at the majority of locations due to the existing levels of NO <sub>x</sub> and HF, which exceed the objective even without the plant in operation. 5 nitrogen deposition rates and acid deposition rates currently exceed the assumed critical load at all of the ecological receptor locations without the proposed plant operational. In view of the above the KMBC request that the permit includes conditions requiring the operator to monitor emissions to air and to sewer and to make the results of the monitoring available to the public.
Summary of actions taken or show how this has been covered
The increased capacity is catered for by an increase in storage area and an improvement in the containment infrastructure. The plant contribution of NO <sub>x</sub>



and HF emissions to air are assessed as being insignificant. The permit contains monitoring and reporting conditions for emissions to air and water which will be placed on the public register. The response from Public Health England raised no concerns about health impacts and requested the same monitoring requirements be put in the permit.

The emissions to air and to sewer are those specified in the IED and are considered to be protective of health.

**Response received from**

Member of the Public by email.

**Brief summary of issues raised**

The respondent objected to the location of the activity in Kirkby;

- 1 on the grounds of the existing highly industrialised nature of the area
- 2 because of the danger of odours, vermin and health effects
- 3 the risk of the development reducing house prices
- 4 the impact of increased traffic flow.

**Summary of actions taken or show how this has been covered**

Items 1,3 and 4 are planning issues.

The operator has an odour management plan and the permit contains specific conditions to prevent odour.

The site is not considered a high risk of vermin infestation because of the lack of suitable food sources in the permitted waste types and all waste is contained either on pallets or in bulk storage tanks.

We consider that, in reaching our decision, we have taken into account all relevant considerations and legal requirements and that the permit will ensure that a high level of protection is provided for the environment and human health.

The European Integrated Pollution Prevention and Control Bureau stated in the Reference Document on the Best Available Techniques for Waste Incineration August 2006 "European health impact assessment studies, on the basis of current evidence and modern emission performance, suggest that the local impacts of incinerator emissions to air are either negligible or not detectable."

No response was received from the following;

United Utilities

Food standards Agency

Health and Safety Executive

West Lancashire District Council

Knowsley PCT (response from PHE)