

Permitting decisions

Variation

We have decided to grant the variation for Hope Farm Composting Facility operated by Hope Farm Limited. The variation number is EPR/EB3805UL/V002.

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken in to account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses

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

Read the permitting decisions in conjunction with the environmental permit and the variation notice. The introductory note summarises what the variation covers.

Key issues of the decision

Odour

The handling and processing of waste or any substance that is or may contain a volatile organic compounds or other odorous substances will potentially lead to odour noticeable beyond the site boundary, even at concentrations that may be well below benchmark emission limit values. Odours may arise from the waste reception, handling areas and from storage of the waste material. Failure to adequately understand the inventory of odorous compounds, inspect and maintain plant and equipment is a contributory cause to fugitive emissions.

Composting on aerobic treatment sites may produce odours as a result of normal operations and odours can become significant if there are local sensitive receptors. Recognising where the potential release of odorous compounds may arise is paramount in order to design out potential releases or manage and minimise odours from the site.

This variation is to increase the throughput of the facility from 12,000 tonnes to 35,000 tonnes per annum of compostable waste. As a result the windrow capacity has increased and therefore there will be an increase in potentially odorous material on site. The variation is also to include new EWC waste codes, including EWC 02 01 07 animal faeces, urine and manure (including spoiled straw) only. These new waste types could also potentially increase the odour emissions from the site.

An Odour Management Plan (OMP) has been developed in accordance with Horizontal Guidance H4. It details the type of material the site will be treating; the type of odours that are likely to arise from various parts of the process, and the mitigation methods that have been put in place to reduce or prevent these odours from impacting on local sensitive receptors. The operator has provided an OMP for the facility (report reference: ETL/203/MNF/01/R02/OMP/V.1, dated: March 2017).

The closest sensitive receptor to odour is a residential property approximately 580m south west of the Installation. The majority of other sensitive receptors are over 800m from the site boundary. The prevailing wind direction is westerly which will also reduce the pathway to the closest receptor.

The following management methods to reduce the impact of odour on the sensitive receptors are further detailed in the Odour Management Plan:

- Waste acceptance procedures and rejecting of malodorous waste procedure;
- Meteorological data is monitored on a daily basis and is used to inform the choice of abatement methods/ controls;
- Routine process monitoring including batch size monitoring, temperature, moisture assessed against process validation criteria;
- Routine odour monitoring and additional odour monitoring during abnormal conditions and in response to odour complaints; and,
- Community engagement and liaison with regard to odour.

We are satisfied that the OMP is sufficient to minimise the potential for odour emissions from the facility to cause nuisance outside the installation boundary. The Operator is required to operate at all times in accordance with the site OMP to prevent pollution arising from odours and implement all mitigation measures in line with the plan.

Bioaerosol

The Environment Agency's *Composting and potential health effects from bioaerosol: guidance for permit applicants* refers to the need for open processing sites within 250m of a sensitive receptor to submit a site specific bioaerosol risk assessment (detailing suitable mitigation measures where appropriate) with their permit application. The consensus from various studies is that bioaerosols from composting activities decline rapidly within the first 100 metres from a site and generally decline to background levels within 250m.

The operator has undertaken a bioaerosol risk assessment to assess the impact from potential bioaerosol release at the closest receptor. The site is situated within a rural landscape with agricultural land surrounding the site. The closest receptor to the site at risk from bioaerosols is the residential property owned and lived in by the operators. The next closest potential sensitive receptor is approximately 580m south west of the Installation, and is therefore not expected to be impacted by bioaerosols from the site.

To minimise the generation and subsequent dispersal of bioaerosols, a number of preventative control measures will be implemented on site. The following methods have been established in the sites Environmental Management System:

- There will be an on-site weather station that will provide real time weather data to inform management decisions.
- Two mobile Vortex Rotary Atomisers will be utilised to suppress airborne emissions during shredding, turning and screening, when the receptor is downwind of operations.
- No operations that could result in a high level of bioaerosol emissions will take place when Hope Farm is located down wind and is occupied.

We are satisfied that the operator has sufficient management techniques to reduce the risk of bioaerosol impact on the nearby sensitive receptor. The permit now includes a bioaerosol monitoring condition. Monitoring is to be carried out upwind and downwind of the site every quarter in accordance with Technical Guidance Note M9.

Capacity and containment

The site boundary will be increased in all directions, as shown on the site plan (reference: Composting Site Layout - 1874.12, dated: November 2015). The main operational areas to be increased will be the area for windrows, located in the north west of the site, and a new incoming tipping area located to the south of the site. The increase of the windrowed area to approximately 3,600m² will result in the concrete retaining walls, located around the boundary of the main operational area, to be expanded to the north west.

As stated in the Environmental Management System (reference: ETL/JSC/00140/R00187, dated: November 2016) all of the storage, physical treatment and composting of wastes will take place on an impermeable surface with a sealed drainage system. The Environment Agency shall be consulted on the works prior to construction.

The annual throughput tonnage has been increased as part of this variation from 12,000 tonnes per annum (tpa) to 35,000tpa of organic waste. Each windrow is estimated to have a capacity of 1,260m³ or approximately 500 tonnes of organic waste. The eight windrows would therefore have capacity for approximately 4,000 tonnes of organic waste. As the processing time for the windrows is 4-6 weeks, the site has sufficient capacity to meet the annual throughput of 35,000tpa.

The combined maximum storage areas for waste shall not exceed 5,747 tonnes at any one time.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on confidentiality.
Consultation/Engagement	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> • Food Standards Agency • Public Health England • Health and Safety Executive • Shepway Council Public Health • Director of Public Health <p>The comments and our responses are summarised in the consultation section.</p>
The facility	
The regulated facility	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits.</p> <p>The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.</p>
The site	
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. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or</p>

Aspect considered	Decision
	<p>habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with our guidance.</p>
Environmental risk assessment	
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. The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment, all emissions may be categorised as environmentally insignificant.</p> <p>Please see the Key Issues section for further details on odour and bioaerosols. The impact of noise to sensitive receptors is expected to be low.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes, <i>Sector guidance note S5.06: Guidance for the recovery and Disposal of Hazardous and Non-Hazardous Waste</i>; <i>EPR 1.00 - How to comply with you Environmental Permit</i>; <i>Horizontal Guidance H4 – Odour Management</i>, and we consider them to represent appropriate techniques for the facility.</p> <p>The following BAT procedures will be used in the operation of the site:</p> <ul style="list-style-type: none"> • All wastes accepted at the site will be stored on impermeable concrete pad with drainage to a lagoon and dirty water tanks; • Water collected through the system will be considered for re-use within the composting process to provide moisture as required; • Frequent monitoring of parameters throughout the process. <p>The operating techniques that the operator must use are specified in table S1.2 in the environmental permit.</p>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory. See Key Issues for further details.</p>
Permit conditions	
Updating permit conditions during consolidation	<p>We have updated permit conditions to those in the current generic permit template as part of permit consolidation. The conditions will provide the same level of protection as those in the previous permits.</p>
Waste types	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <p>We have assessed the waste codes proposed by the operator and consider them to be acceptable and consistent with the PAS 100 protocol.</p>

Aspect considered	Decision
	<p>We are satisfied that the operator can accept these wastes for the following reasons:</p> <ul style="list-style-type: none"> • they are suitable for the proposed activities; • the proposed infrastructure is appropriate; and • the environmental risk assessment is acceptable. <p>The description of the EWC waste types in Table 2.2 of the notice is in accordance with the description specified in the revised Standard Rules permit templates.</p> <p>We made these decisions with respect to waste types in accordance with Sector Guidance Note S5.06: Guidance on the recovery and disposal of hazardous and non-hazardous waste.</p>
Emission limits	<p>We have decided that bioaerosols threshold limits should be set for the parameters listed in the permit.</p> <p>The following substances have been identified as being emitted in significant quantities and threshold limits have been set for those substances:</p> <ul style="list-style-type: none"> • Total bacteria - 1,000 CFU m⁻³ • Aspergillus Fumigatus - 500 CFU m⁻³
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>We have required monitoring to be undertaken in the permit, this is to ensure the facility is operated in such a way as to control bioaerosols and to ensure that the facility is operated in accordance with BAT.</p>
Reporting	We have specified reporting in the permit.
Considerations of foul sewer	We agree with the operator's justification for not connecting to foul sewer.
Operator competence	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Technical competence	<p>Technical competence is required for activities permitted. The operator is a member of an agreed scheme.</p> <p>We are satisfied that the operator is technically competent.</p>
Relevant convictions	<p>The Case Management System has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

Consultation

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Shepway District Council - 22/02/17
Brief summary of issues raised
The Council identified that the site are currently not accepting animal manure on site, but are seeking to diverse into this area. The Council suggested a robust mitigation to be added to their SOP, should this material be accepted on to the site. There were also major concerns if poultry manure is accepted on to the site as this type of animal manure is extremely potent in reference to odour.
Summary of actions taken or show how this has been covered
Odour emissions from the site and the appropriate measures in the Odour Management Plan have been identified in the key issues . The operator will be required to take appropriate action if odour is detected during monitoring or if an odour complaint is received. This is addressed in Condition 3.3 in the permit.