

Permitting decisions

Variation

We have decided to grant the variation for Hapton Valley Transfer Station operated by Envirofuel (SRF) Ltd (the Operator).

The variation number is EPR/DB3303HQ/V003.

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:

- 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

Fire Prevention Plan

An updated Fire Prevention Plan (FPP) was assessed during our determination of this permit variation due to the Operator's proposed changes in how they store and process non-hazardous combustible waste. We have reviewed the FPP in line with our FPP Guidance ('Fire prevention plans: environmental permits', last updated 4 May 2018) and approved version 20C of the FPP dated November 2019.

Waste treatment and the majority of storage will take place within buildings on the site: the 'transfer station', the 'pelletising building' and the 'biomass boiler building'. Waste will be sorted, shredded, dried and then either baled, pelletised or stored loose as solid recovered fuel (SRF).

Types of combustible waste

The main incoming waste stream comprises mixed municipal waste.

The previous permit for the site allowed the Operator to take a range of combustible wastes which have not been assessed as part of this FPP, including waste tyres and end-of-life vehicles. The Operator has stated in their FPP that the Environment Agency will be consulted before these wastes are accepted at the site. We have agreed to this approach on this occasion.

Storage of waste

This application initially proposed to increase the size of some waste piles in excess of the limits stated in the FPP Guidance and to install two waste storage silos. We requested further information from the Operator to determine the associated environmental risk. Following this, the Operator amended their application to withdraw the storage silos and decrease the size of the waste piles to meet the maximum dimensions stated in our FPP Guidance. Waste will be stored for a maximum of three months on the site, though the majority will be stored for a much shorter duration¹.

Waste piles will be separated either by a minimum distance of six metres or by firewalls which meet the specifications listed in section 11.2 of our FPP Guidance. Some of the firewalls are existing and some will be installed following the issue of this variation. A six metre separation distance will be used until the new firewalls are installed.

This variation also amends the location of the Operator's quarantine areas. Any hot loads which are received at the site will be deposited in the reception area of either the transfer station or the biomass boiler building, depending on the available space. Other incompatible wastes can be stored within an enclosed container in the yard to the transfer station (to the north of the site). In the event of a fire, the Operator plans to move this container to create an open space for quarantining waste.

Fire detection and suppression

Fire detection and suppression systems will be installed in all three buildings on site which store and process waste. The transfer station and pelletising building will be fitted with a 'PYROsmart' system which can detect and suppress fire. This system will be supplied by a 45,000 litre water tank for the initial 30 minutes of operation; after this point the system can be connected to a hydrant nearby.

The 'PYROsmart' system continually monitors surface temperatures within the buildings to prevent fire. Recorded temperatures will be checked twice during the day and twice during the night. If operatives detect temperatures of 60°C or more within the waste, it will be dismantled and allowed to cool. This will act as an early warning system as the typical combustion temperature of SRF is reported to be 120°C.

The biomass boiler building will be fitted with a smoke detection and mist suppression system which will be certified to a relevant British Standard.

Water supplies

A storage tank which holds 1,136,000 litres of water is located outside of the Operator's permit boundary within the Hapton Valley Estate. Although this water supply may also be used by other operators, fire is considered unlikely to affect multiple premises at the same time due to the distance between the units on the Estate. A hydrant is also located to the north of the site.

The water supply provided by the storage tank meets the requirements of our FPP Guidance, which requires at least 2,000 litres per minute over three hours for a 300m³ waste pile. As the largest waste pile at the site will be 450m³, the minimum required supply is 540,000 litres of water.

Containment of firewater

It states in our FPP Guidance that operators must be able to contain firewater to prevent pollution of the environment. We requested further information from the Operator to demonstrate their compliance with this requirement.

The majority of waste on site is held within buildings. In the event of a fire, the Operator plans to contain run-off within the buildings by installing kerbs at the openings (entrance and exit points). An improvement condition in the permit (reference number 4) requires the Operator to submit a report to the Environment

¹ See table 2 of the FPP (report 11575/20C).

Agency by 28/02/2020 detailing the works to be undertaken. Kerbing must be installed by 04/03/2020. If a fire occurs before this date, the Operator may use temporary booms to contain firewater within the buildings.

The containment volumes required are as follows:

- 540,000 litres in the transfer station based on the largest waste pile of 450m³;
- 258,840 litres in the pelletising building based on the largest waste pile of 215.7m³; and
- 95,220 litres in the biomass boiler building based on the largest waste pile of 79.35m³.

The Operator has stated in their application that they can contain these volumes of run-off based on a capacity of 725,900 litres in the transfer station, 309,400 litres in the pelletising building and 122,500 litres in the biomass boiler building.

Some waste will also be stored outside, including baled SRF in the yard to the transfer station. As the largest pile could have a volume of 446m³, the Operator needs to be able to contain up to 535,200 litres of firewater. The yard is stated to have capacity of 1,375,000 litres. The perimeter of the yard is kerbed and the surfacing is impermeable. There is a discharge point nearby to a surface water sewer but the Operator plans to install a penstock valve at this point which will be closed by default when waste is stored in the yard. An improvement condition in the permit (reference number 5) requires the valve to be installed by 24/07/2020. In the interim, operatives will use booms to prevent firewater reaching the discharge point in the event of a fire.

A skip holding waste unsuitable for processing will also be stored outside of the transfer station; the storage volume of the skip is relatively small (8m³) and it is considered likely that firewater would be contained within the skip itself.

Combustible waste, including plant material and ferrous metals, may also be stored within bays in the yard to the biomass boiler building. The surfacing in this area is currently permeable, so we have set a pre-operational condition requiring the Operator to install a sealed drainage system prior to storing wastes which are combustible or liable to contaminate surface water in this yard. The Operator has proposed to install a sealed sump to prevent the discharge of contaminated run-off from this part of the site. The contents of the sump will be collected for appropriate disposal during periods of heavy rainfall.

Biomass boilers

This variation includes the installation of two boilers each with a capacity of 1 MWth. The boilers were installed prior to 20 December 2018. Limits, monitoring and reporting associated with the Medium Combustion Plant Directive should be permitted by 1 January 2029 and complied with by 2030.

We have assessed the pollution risks and concluded that air emissions from small biomass boilers are not likely to pose a significant risk to the environment or human health providing certain conditions are met. It is considered that a quantitative assessment of air emissions is not required where:

- the fuel is derived from virgin timber, miscanthus or straw;
- the biomass boiler appliance and installation meets the technical criteria to be eligible for the Renewable Heat Incentive;
- the aggregate boiler net rated thermal input is less than or equal to 4 MWth, and no individual boiler has a net thermal input greater than 1 MWth;
- the stack height is a minimum of 5 metres above the ground (where there are buildings within 25 metres the stack height must be greater than 1 metre above the roof level of buildings within 25 metres (including the building housing the biomass boilers); and
- there are no sensitive receptors within 50 metres of the emission points.

This is in line with the following guidance: <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit#air-emissions-biomass-boilers>. Although this application is for a waste treatment site and not an intensive farming installation, the principles contained in the guidance are considered to be transferrable to this site.

The boilers at the Hapton Valley Transfer Station meet the criteria above as:

- they are fuelled by virgin woodchip;

- they have been issued with a Renewable Heat Incentive certificate;
- the aggregated net rated thermal input is 2 MWth and the boilers have an individual input of 1 MWth;
- the height of the boiler stacks is 9 metres above the ground and they are greater than 1 metre above the roof level of the biomass boiler building, which is the only building within 25 metres of the emission points; and
- the only receptors within 50 metres of the emission points are industrial buildings and these are not considered to be sensitive receptors for the purposes of this air quality risk assessment.

The boilers are therefore not likely to pose a significant risk to the environment or human health and no further assessment of their emissions is required at this stage.

Diesel generators

During the determination of this application, we became aware of two diesel generators each with a capacity of approximately 1 MWth. The generators were installed in 2016 and 2017 to provide power to the permitted activities. Emissions of nitrogen dioxide (NO_x) from the generators were screened using our 'H1' risk assessment tool and it was determined that the emissions were not insignificant alone (stage one) or in combination with background levels (stage two) (see web guidance '[Air emissions risk assessment for your environmental permit](#)' published 1 February 2016 and last updated 2 August 2016).

The Operator proposed to replace the generators with plant which met the new 'specified generator' emission limit of 190 mg/m³ NO_x (Schedule 25B of EPR as amended 2018) but this also failed stages one and two of the H1 screening. Detailed modelling was therefore required from the Operator to determine the impact of their emissions. On 20/06/19 the Operator informed us that the generators would not be used to routinely power plant and that the site would instead install a connection to the mains.

We have since become aware that the mains connection may not be installed until 15/10/2020. Subsequently the permit allows the operator to use one of the engines at any one time up until this date. This decision has been made to allow the site to continue operating for a period of time whilst ensuring that the risk to nearby sensitive receptors is reduced.

After 15/10/2020, the two generators may be kept at the site as standby plant for emergency use only. Backup generators which provide emergency power to a site are excluded from the requirements applicable to specified generators (see web guidance '[Specified generator: when you need a permit](#)' published 15 July 2019 and last updated 5 September 2019). These generators will also be considered as 'existing plant' for the purposes of medium combustion plant regulation (Schedule 25A of EPR as amended 2018) since they were put into operation before 20 December 2018 (see web guidance '[Medium combustion plant: when you need a permit](#)' published 15 July 2019). Emissions monitoring from standby generators is not currently required and so has not been specified in this permit.

Noise impact assessment

We issued a Schedule 5 Notice on 17/01/19 requesting further information to assess the risk of noise associated with the application. The Operator provided an assessment of the noise levels from the entirety of their operations and considered the new sources of noise specifically to assess the predicted impact. The assessment was based partially on actual data from measured noise and also from sound power levels of the new plant. The design of the extraction fans had not been finalised at the time of the permit application, but the assessment is based on a design which will not exceed a noise level of 35 dB LA90, 1 hour as predicted or measured in the rear garden of number 10 Valley Gardens (which is considered to be the most sensitive residential receptor for the site). The specification has been included as an operating technique of the permit. At the Operator has demonstrated that the changes will not increase the noise levels at sensitive receptors, we consider the proposals to be satisfactory.

Odour

Assessment and risk management

Hapton Valley Transfer Station is an existing waste site which has previously been permitted to store and treat up to 120,000 tonnes of non-hazardous waste per annum. The Operator is permitted to accept a range of wastes but the main waste type currently accepted is mixed waste which has been mechanically treated.

The main changes which could impact on the odour risk posed by the site result from:

- an increase in the annual throughput of waste from 120,000 tonnes to 150,000 tonnes;
- an extension of the permit boundary to the south of the site;
- additions to the process to enable drying of waste on conveyors and a perforated drying floor;
- addition of two 20 metre high stacks for the dispersion of air from all operational buildings on site; and
- relocation of some waste storage to external parts of the site.

The Operator submitted an odour modelling report to assess the risk from their proposals (document reference 153300/OA dated 06/07/18 and received on 11/12/18). The modelling predicts odour impacts of up to 0.58 ouE/m³ based on dispersion alone. It states in our Guidance 'H4 Odour Management' that 1 ouE/m³ is the point of detection. The Operator will also be installing an activated carbon unit within each of the two stacks to further reduce the risk of odour pollution from point source emissions. We have not undertaken a full audit of the modelling assessment as the risk of odour is predicted to be low.

However, it is recognised that there are inherent odour risks from operation of a household, commercial and industrial waste transfer station and from treatment of the types of wastes which are handled at Hapton Valley Transfer Station (see our '[Control and monitor emissions for your environmental permit](#)', last updated 8 November 2018). The Operator was therefore required to submit an odour management plan (OMP) to explain how they will prevent or, where that is not possible, minimise odour from the site. We have reviewed the OMP (Report No. 11575/6F dated November 2019) and are satisfied that this demonstrates best available techniques for the site.

The key measures contained in the OMP include:

- checks at the pre-acceptance and waste acceptance stages to prioritise the processing of wastes with a higher risk of odour;
- covering vehicles during transport into, around and out of the site;
- short storage durations of all potentially odorous wastes²;
- localised extraction and dispersion of gases produced from the drying of waste;
- use of adsorption to abate odorous gases, identified as a best available technique for the physico-chemical treatment of waste with calorific value in Conclusion 45 on Waste Treatment BAT (published August 2018);
- quarantining of high risk waste in an enclosed container; and
- provision of contingency measures to restrict processing in the event of equipment failure.

The Operator will undertake daily sniff tests around the boundary of the site, in consideration of our H4 Odour Management guidance, and will monitor for volatile organic compounds (VOCs) in point source emissions to air using a photoionization detector on a monthly basis.

A complaints procedure and a method for reviewing measures are also contained in the OMP.

Improvement conditions - odour

Although the Operator considers VOCs to be the main pollutant of significance in their emissions to air, we have set improvement programmes (permit references 2 and 3) requiring monitoring to be undertaken to also check for the presence of ammonia and hydrogen sulphide. The Operator will need to propose further measures to prevent odour pollution from their activities if these pollutants are detected at significant levels.

² 'Table 1: Odour Source inventory and Storage Limits' of the OMP

An improvement programme (permit reference 1) has also been set to require further details of the parameters to be monitored by the Operator to ensure that the activated carbon abatement system is working under optimal conditions.

Dust

It states in our Guidance '[Control and monitor emissions for your environmental permit](#)' (last updated 8 November 2018) that operators are required to provide a dust management plan (DMP) when they apply for a bespoke permit to keep and/or treat relevant wastes if they are located within 500 metres of a sensitive receptor. As the wastes handled by the site have the potential to generate dust, and the nearest sensitive receptor is within 100 metres of the boundary of the site, a DMP has been reviewed and approved during this permit variation.

Conclusions on Best Available Techniques (BAT)

Emission levels associated with BAT for waste treatment as established in the BAT Conclusions (published August 2018) have been considered during this permit variation application.

BAT Conclusion 25

BAT Conclusion 25 applies to emissions to air from the mechanical treatment of waste. Hapton Valley Transfer Station undertakes a range of mechanical treatment, including shredding and pelletising of waste. These activities take place within the buildings on site, which will be operating an extraction system leading to point source emissions to air.

Although the shredder is already operational on site as part of the permitted waste operation, it is considered as 'new plant' for the purposes of BAT as it is an integral part of the newly listed installation activity to be regulated under the Industrial Emissions Directive (Section 5.4 Part A(1)(b)(ii) of The Environmental Permitting (England and Wales) Regulations 2016 - 'Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving pre-treatment of waste for incineration or co-incineration').

The Operator will use a fabric filter to reduce emissions of dust to air. This is recognised as BAT in Conclusion 25. The fabric filter will not be directly connected to the shredder on site.

The BAT-associated emission level (BAT-AEL) for channelled emissions of dust to air from the mechanical treatment of waste is 2-5 mg/Nm³. We have set a lower limit than this of 1 mg/Nm³ based on the results of the Operator's screening assessment of PM₁₀ using our H1 screening tool (submitted on 03/09/19).

BAT Conclusion 45

BAT Conclusion 45 applies to the physico-chemical treatment of waste with calorific value. This applies to the process of drying waste to reduce the moisture content and improve its calorific value. The Operator will use adsorption in the form of activated carbon to reduce emissions of organic compounds to air, which is recognised as BAT in Conclusion 45.

The BAT-AEL for channelled emissions of total volatile organic compounds (TVOC) is 5-30 mg/Nm³. We have set a limit in the permit of 9 mg/Nm³ based on the results of the Operator's screening assessment of benzene using our H1 screening tool (submitted 03/09/19). Benzene was selected on a precautionary basis following our guidance '[Air emissions risk assessment for your environmental permit](#)' (published 1 February 2016 and last updated 2 August 2016).

BAT Conclusion 8

BAT Conclusion 8 outlines the minimum monitoring standards and frequencies for channelled emissions to air. In line with BAT Conclusion 8, we have set periodic monitoring on a six monthly basis for dust and TVOC from the relevant air emission points on site (A1 and A2).

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality had been made by the applicant, however this was withdrawn on 11/01/19.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential.
Consultation	
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"> • Local Planning Authority – Burnley and Lancashire • Local Authority – Environmental Health – Burnley • Public Health England • Director of Public Health • Health and Safety Executive • Fire and Rescue – West Yorkshire and Lancashire • United Utilities <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 facilities at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’, Appendix 2 of RGN 2 ‘Defining the scope of the installation’ and Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.</p> <p>The extent of the facilities are 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.

Aspect considered	Decision
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 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. A stage 1 Habitats Regulations Assessment was sent to Natural England for information only on 26/07/19.</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.</p>
Operating techniques	
General operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.</p> <p>The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p>
Operating techniques for emissions that screen out as insignificant	<p>Emissions of volatile organic compounds (assessed as benzene on a precautionary basis) and particulate matter (PM₁₀) have screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation.</p> <p>We consider that the emission limits included in the installation permit reflect the BAT for the sector.</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. However, we have set improvement programmes for the Operator to provide some further details at a future date.</p> <p>See the key issues section for further information.</p>
Fire prevention plan	<p>We have assessed the fire prevention plan and are satisfied that it meets the measures and objectives set out in the Fire Prevention Plan guidance. See the key issues section for further information.</p>
Permit conditions	
Raw materials	We have specified limits and controls on the use of raw materials and fuels.

Aspect considered	Decision
	<p>We have specified that only virgin timber (including woodchips and pellets), straw, miscanthus or a combination of these are acceptable to fuel the biomass boilers. These materials are never to be mixed with or replaced by waste.</p>
<p>Waste types</p>	<p>We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.</p> <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>We made these decisions with respect to waste types in accordance with the risk assessments provided by the Operator and Sector Guidance Note S5.06 - 'Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste'.</p>
<p>Pre-operational conditions</p>	<p>Based on the information in the application, we consider that we need to impose a pre-operational condition.</p> <p>A pre-operational condition has been set to prevent the storage of waste in the yard adjoining the biomass boiler building until re-surfacing works have been completed to provide a sealed drainage system.</p> <p>See the key issues section for further information.</p>
<p>Improvement programme</p>	<p>Based on the information on the application, we consider that we need to impose an improvement programme.</p> <p>We have imposed improvement programmes to ensure that pollution does not result from odours or firewater run-off. See the key issues section for further information.</p>
<p>Emission limits</p>	<p>ELVs based on BAT have been added for the following substances:</p> <ul style="list-style-type: none"> • 9 mg/Nm³ Total volatile organic carbon (TVOC) expressed as C • 1 mg/Nm³ dust, which may be reported as PM₁₀. <p>See the key issues section for further information.</p>
<p>Monitoring</p>	<p>We have decided that monitoring should be added for the following parameters, using the methods detailed and to the frequencies specified:</p> <ul style="list-style-type: none"> • Total volatile organic carbon (TVOC) expressed as C • Dust <p>These monitoring requirements have been imposed in order to implement BAT 8 as listed in the BAT Conclusions for Waste Treatment (published August 2018).</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>

Aspect considered	Decision
Reporting	<p>We have added reporting in the permit for the following parameters:</p> <ul style="list-style-type: none"> • Total volatile organic carbon (TVOC) expressed as C • Dust <p>We made these decisions in accordance with BAT 8 as listed in the BAT Conclusions for Waste Treatment (published August 2018).</p>
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>
Technical competence	<p>Technical competence is required for activities permitted.</p> <p>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>
Growth duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

The following summarises the responses to consultation with other organisations and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from
Public Health England (PHE)
Brief summary of issues raised
PHE highlighted that the recovery of mixed waste and the drying of SRF have potential to produce fugitive emissions of dust and odour. Based on the information contained in the application, and provided that the operator takes all appropriate measures to prevent or control pollution, PHE did not have any significant concerns regarding the risk to health of the local population. PHE recommended any environmental permit for the site to contain conditions to prevent fugitive emissions to air, including dust and odour, from impacting upon public health.
Summary of actions taken or show how this has been covered
We requested further information from the Operator regarding the risks and associated measures to control fugitive emissions. The Operator has provided an Odour Management Plan (OMP), an odour modelling report and a Dust Management Plan (DMP). We have reviewed the OMP and DMP and consider that the measures they contain represent best available techniques for the facility. See the key issues section for further details. The permit contains our standard conditions, 3.2 and 3.3, to control fugitive emissions including odour.

Response received from
Lancashire Fire and Rescue Service (FRS)
Brief summary of issues raised
The FRS raised concerns regarding firewater run-off from the biomass boiler building due to an open discharge point from the building and they noted that the fire separation between the office and the waste transfer station was compromised. The FRS also commented on the risk of fire from a generator being located in close proximity to the proposed waste storage silo.
Summary of actions taken or show how this has been covered
We requested further information from the Operator to demonstrate containment of firewater across the site. The approved Fire Prevention Plan (FPP) sets out plans to contain firewater within each of their three buildings, which will be sealed. Kerbing will be installed at the entrances to the buildings and temporary booms will be used to provide containment in the interim. The approved FPP also provides a site layout plan which shows fire walls between the waste piles and the office. We requested a housekeeping procedure from the Operator, appended to the FPP, to ensure that the risk of fire spreading is minimised. The Operator withdrew the generators and the waste storage silos during our determination of the application. The associated risk highlighted by the FRS is therefore removed.