

Permitting decisions

Bespoke permit

We have decided to grant the permit for Court Lodge Farm AD Plant operated by BioConstruct NewEnergy Ltd.

The permit number is EPR/UP3401PS/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 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. The introductory note summarises what the permit covers.

Key issues of the decision

Air emissions assessment from the combined heat and power (CHP) engine

An assessment of the impact on air quality was required as the installation will release emissions to air from one CHP engine and biogas upgrading plant.

Dispersion modelling of NO_x, SO₂, CO and volatile organic compounds (VOCs) emissions was undertaken by the applicant. Impacts at human sensitive receptors were quantified and the results compared with the relevant Environmental Standards (ES). Modelling was undertaken based on the worst case scenario, where one CHP engine is operating continually.

All emissions at the surrounding human sensitive receptors were screened out as insignificant, as process contributions were either <1% of the long term ES and <10% of the short term ES or the predicted environmental concentrations (PEC) calculated from the process contributions was <70% of the ES.

The following non-statutory sites are located within 2 km of the Installation:

Local Wildlife Sites

- Horton Wood, Horton Kirby
- Field Edge near Fawkham
- Sutton at Hone Lakes

Ancient Woodland Sites

- Horton Wood
- Hopkilm Spring Wood
- Stubs Spring/Well Shaw East
- Grove Wood/Purfield Wood
- Purfield Wood
- Highfield Spring/Broomfield Wood/Ox Leys
- Rabbits Wood/Heron Wood
- 3 unnamed sites

We reviewed the applicant's assessment and we agree with the conclusions, that the emissions from the installation will not damage the special features of the non-statutory sites. As there are no specific regulations for the protection of these sites (*beyond our requirements to enhance biodiversity under the Natural Environment and Rural Communities Act 2006 and our wider conservation duties under the Environment Act*), we are required to ensure that the permitting of the installation will not result in significant pollution.

In accordance with Environment Agency guidance, we consider that given the size of the process contribution which is a small fraction of the critical level and load, the impact of emissions from the installation on the sites is not likely to cause significant pollution. As modelling and assessment has demonstrated that the predicted ground level environmental concentrations of pollutants even at a maximum will not compromise any Air Quality Objectives, then we are satisfied that the operation of the AD facility will not compromise the integrity of the above habitat sites. The applicant is required to prevent, minimise and control emissions using BAT.

Air emissions assessment from the biogas upgrading plant

The biogas upgrading plant consists of a three stage membrane system designed to remove CO₂ and H₂O from the raw biogas.

- *Stage 1* separates the raw biogas into a high pressure CH₄ stream (retentate) and low pressure CO₂ stream (permeate). The CH₄ stream is fed onto stage 2 and the CO₂ stream is fed onto stage 3.

- *Stage 2* takes the high pressure CH₄ stream to produce grid quality CH₄ and the resulting CO₂ stream is routed back in front of the compressors.
- *Stage 3* separates the remaining CH₄ and returns this to the compressors while the remaining CO₂ is vented to atmosphere.

The design is controlled such that the methane slip is reduced up to 0.5% to 1% of the total flow.

An assessment of the impact of emissions of VOCs and H₂S from the biogas upgrading plant was calculated using the H1 emissions screening tool. All emissions of these substances screened out as insignificant for human receptors.

The emissions data used in the H1 assessment is based on information from the plant manufacturer and not based on real-time operational monitoring data from the site. We consider it appropriate to set Improvement condition 1 which requires the operator to undertake a monitoring survey following the commencement of operations at the biogas upgrading plant to obtain actual (real-time) operational monitoring data from the plant itself.

Improvement Condition 2 (IC2) requires 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 – Air emissions risk assessment for your environmental permit. Following the review of results from the monitoring survey and impact assessment, we shall consider whether or not emission limits are appropriate at emission point A5. This is our current approach for biowaste treatment facilities proposing to install biogas upgrading plants across England.

Fugitive emissions to air, land and water

The Industrial Emissions Directive (IED) specifies that plants must be able to demonstrate that they are designed in such a way as to prevent the unauthorised and accidental release of polluting substances into soil, surface water and groundwater. In addition, storage requirements for waste and for contaminated water must be arranged.

The operator reports that road surfaces are concrete, so there is a low likelihood of generation of litter, mud and dust. Wheel washing facilities will be available on site if required. If the road surface becomes dry and more dust is being created, the road surface will be dampened down to minimise dust. Roads and concrete reception /yard areas will be swept and kept clean on a regular basis. An inspection will be made of all vehicles entering the site at the weigh bridge, and any concerns over mud on the wheels of incoming vehicles will be recorded and addressed with the supplier /haulier in question.

Following pasteurisation, digestate will be transferred to a screw separator to produce a liquid and solid fibre fraction. The separator is mounted on a steel platform. Separated solid digestate will fall from the end of the separator to a concrete clamp below, where it will be transferred to a digestate storage area under cover prior to despatch off-site. Liquid digestate will be transferred to a covered lagoon by a closed pipe system thereby reducing any associated odours. All digestate loading operations will be supervised by site staff. Loading of digestate will take place in a purpose built impermeable area adjacent to the lagoon. Spill kits and wheel washing facilities will be available in this area to aid immediate cleaning following any small spills.

Activities on site will be operated in accordance with the site's management system. This will include regular inspections and maintenance of equipment to ensure they continue to operate at optimum conditions. The waste treatment operations has a number of process control features which prevents the development of abnormal operating conditions. Operations will be controlled and monitored using a Supervisory Control and Data Acquisition (SCADA) system which creates documentation that can be accessed in remote locations. The system will provide a range of control and monitoring functions that automate and monitor actions throughout the plant. These procedures are designed to ensure the integrity of the plant throughout the life of the facility. A Hazard and Operability (HAZOP) study and Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) assessment has been carried out and includes details of the warning systems, escape facilities, emergency procedures and training requirements. An accident management plan is also in place.

The operator reports that all areas within the waste reception and treatment areas benefit from an impermeable surface which will prevent the release of potentially polluting liquids to surface water and groundwater. All cleaning chemicals will be stored with lids or caps secured. Chemicals will be segregated as appropriate, and stored in secondary containers to catch any small spillages.

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 and 25% of total tank volume (whichever is the greater). An inspection and maintenance schedule has been prepared for the installation.

The applicant provided additional information in the form of a report to confirm that the construction and integrity of the site secondary containment, silage clamps and digestate storage lagoon is fit for purpose and has been designed and constructed in accordance with industry standards. We have accepted the applicant's assessment as valid.

Overall, the Environment Agency considers that the applicant has proposed appropriate measures to minimise any impact of fugitive emissions on nearby sensitive receptors. The permit conditions (3.2.1 to 3.2.3) are sufficient to ensure that emissions of substances not controlled by emission limits do not cause pollution. The operator is required to implement mitigation measures in line with any approved emissions management plan in the event activities on site are causing pollution.

Based upon the information provided in the application, we are satisfied that appropriate measures are in place to prevent fugitive emissions to air, land and water.

Management of odour emissions

Odour impact assessment

The applicant provided a quantitative odour dispersion modelling to assess the impact of odour emissions from site activities. Odour emissions were modelled using the air quality modelling software, ADMS-5.2 (v5.2.2.0). Meteorological data used in the assessment was taken from Gravesend meteorological station over the period 2013 to 2017 (inclusive). Gravesend observation station is approximately 8.9 km north-east of the site. It is considered that conditions are likely to be reasonably similar over a distance of this magnitude and the information is a suitable source of data for an assessment of this nature.

The applicant identified odour sources which were included in the modelling:

These include:

- Exposed crop feedstock within the clamps;
- Exposed poultry litter and farmyard manure within the silage clamps;
- Exposed feedstock during transfer to the feed hopper;
- Exposed material within the feed hopper;
- Air displaced from the pre-storage tanks during transfer;
- Solid digestate within the storage area;
- Liquid digestate within the storage lagoon; and,
- Air expelled from the digestate tanker during filling

The results from the odour modelling for the closest and most sensitive residential receptors are presented in Table 1 below.

Table 1 – Maximum modelled odour concentrations at closest sensitive receptors

Sensitive Receptors	Modelled odour concentration ($C_{98\ 1\ hour}$ OU_E/m^3)
Residential – School Lane	0.41
Residential – School Lane	0.27
Residential – Stack Road	0.30
Residential – Churchill Road	0.23
Residential – Missenden Lane	0.19
Residential – Rabbits Road	0.22

The results show that the indicative criterion for moderate offensiveness ($3.0 \text{ ou}_{\text{EM}^{-3}}$) was not exceeded at any of the receptor locations outside the site boundary. The emissions from the installation are predicted to be not significant and unlikely to give any reasonable cause for annoyance due to odour. We reviewed the odour modelling report and we agree with the contents in the report – that the emissions are below the benchmark for moderate offensive odours. This is based on the plant operating at the parameters quoted in the modelling report.

Management of odour emissions at the facility

The potential sources of odour emissions from the operation of the AD facility include handling of non-waste silage feedstock, liquid waste and animal manure, storage of separated solid and liquid digestate and tanker filling of liquid digestate.

Storage of feedstock

Crop feedstocks will be transferred to the facility using a tractor and trailer during typical harvest periods and deposited within the clamps located on the eastern section of the site. The clamps will be compacted and covered using protective plastic sheeting. This will form an airtight layer to minimise emissions and preserve the feedstock throughout the year. In addition, the protective sheeting will prevent water and air reaching the material and hence avoid any unwanted breakdown with associated emissions. During operational periods, the cover on one of the clamps will be slightly opened at one end to allow access to the feedstock for transportation to the AD plant.

The farmyard manure and poultry manure will only be delivered to site for storage in the clamps prior to transfer to the digesters. Otherwise they will be stored in their current locations (remaining in the sheds they originate from or in existing piles) off-site and outside the installation boundary. The applicant confirms that farmyard and poultry manure stored in the silage clamp will be covered with suitable sheeting.

Liquid feedstock (slurry and whey permeate) will be delivered to the site using vacuum tankers. Following arrival to the facility, the feedstocks will be transferred directly into dedicated pre-storage tanks using a mechanical pumping system. The pumping arrangement is a closed system and therefore the feedstocks will not be exposed to atmosphere.

On delivery of liquid feedstock to the pre-storage tanks, the pump will be uncoupled and a small release of untreated air will vent to atmosphere. The operator considers that the both waste streams are not highly odorous. The cattle slurry is brought onto a farm where cattle are housed. The operator proposes to monitor the transfer of liquid feedstock into the pre-storage tanks and investigate whether further measures are required given the remote setting of the site. We agree that this is acceptable.

Transfer of solid and liquid feedstock

Crop feedstocks and manure will be transferred from the storage clamps to a solid feed hopper using a bucket loader or similar. This will macerate and blend the material prior to processing within the AD plant. Liquid feedstocks will be transferred from the pre-storage tanks to the AD plant via sealed pipelines.

Processing and storage of resultant digestate

Digestate will be separated into solid and liquid fractions using an external screw separator. Solid digestate will be stored in a dedicated storage bay pending removal. The liquid digestate fraction will be stored in a sealed and covered lagoon prior to transfer off-site for land application. The lagoon will feature an expandable polyethylene membrane cover in order to provide containment of emissions.

Removal of digestate from the lagoon will be undertaken using either a closed umbilical system for local land application or vacuum tankers for areas situated further afield. The applicant reports that odour emissions from the digestate tanker are associated with the air being expelled during filling. The applicant commits to fit a carbon filter to abate any odorous emissions during tanker filling of digestate.

The process will be supervised to ensure no spillage of material when loading the tankers. However, in the event of any inadvertent spillages, the spilled material will be collected into drainage pits and then sucked out by tankers before leaving site.

We have reviewed the OMP in its current format. We consider that the operator should update the OMP to include the commitment to:

- to monitor the transfer of liquid feedstock into the pre-storage tanks and investigate whether further measures are required;
- to cover the farm yard and poultry manure in the silage clamps with suitable material prior to transfer to the digesters;
- to cover the solid digestate fraction following separation prior to despatch off-site; and
- to install a carbon filter to abate odour emissions during transfer of liquid digestate from storage lagoon (tank filling).

We have therefore inserted a pre-operational condition 1 (see Table S1.4 in the permit) that requires the operator to submit an updated OMP that addresses the above points. The OMP will require approval by the Environment Agency prior to the acceptance and treatment of waste at the AD facility.

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

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.
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"> • Kent County Council (Environmental Health Department) • Kent County Council (Planning Authority) • Public Health England • Local Fire & Rescue Service • Director of Public Health (Kent County Council) • Health & Safety Executive • National Grid <p>The comments and our responses are summarised in the consultation section.</p>
Operator	
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 our guidance on legal operator for environmental permits.
The facility	
The regulated facility	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. 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.
The site	
Extent of the site of the facility	The operator has provided plans which we consider are satisfactory, showing the extent of the site of the facility. The plans are 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. 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. 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. 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 not significant.</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. 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 nitrogen oxides, sulphur dioxide, carbon monoxide and total volatile organic compounds (VOCs) have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation. 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. We consider that the odour management plan is satisfactory but requires revision to include some key aspects (see key issues section).</p>
Permit conditions	
Raw materials	<p>We have specified limits and controls on the use of raw materials (straw, maize silage and whole crop rye) to ensure that the feedstock going into the digesters is free from contraries such as plastics and metals which may impede the digestion process.</p>
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 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 • the environmental risk assessment is acceptable.

Aspect considered	Decision
	We made these decisions with respect to waste types in accordance with our Framework Guidance Note – <i>Framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment</i> (July 2013).
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions (see key issues section).
Improvement programme	Based on the information on the application, we consider that we need to impose an improvement programme (see key issues section).
Emission limits	<p>ELVs based on BAT have been set for the following substances.</p> <p><u>CHP engine (New medium combustion plant)</u></p> <p>Oxides of nitrogen – 500 mg/m³</p> <p>Sulphur dioxide – 107 mg/m³</p> <p>Carbon monoxide – 1,400 mg/m³</p> <p><u>Emergency flare</u></p> <p>Oxides of nitrogen – 150 mg/m³</p> <p>Sulphur dioxide – 50 mg/m³</p> <p>Total VOCs – 10 mg/m³</p> <p>Annual monitoring of emissions will be carried out to MCERTS standards. The Environment Agency has specified that monitoring of the CHP engines should be carried out in accordance with the monitoring requirements of M2 – Monitoring of stack emissions to air. Guidance for monitoring enclosed landfill gas flares (LFTGN 05) sets out the emission standards for enclosed gas flares.</p>
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 requiring the management of emissions to air.</p> <p>We made these decisions in accordance with the Waste Treatment BREF and BAT Conclusions and our guidance on Medium Combustion Plant and LFTGN 05: Guidance for monitoring enclosed landfill gas flares.</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	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. 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 the requirements of the Industrial Emissions Directive (IED). We made these decisions in accordance with the Draft Technical Guidance for Anaerobic

Aspect considered	Decision
	Digestion (Reference LIT 8737, November 2013).
Operator competence	
Management system	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. The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.
Technical competence	Technical competence is required for activities permitted. The operator is a member of an agreed scheme. We are satisfied that the operator is technically competent.
Relevant convictions	<p>The Case Management System and National Enforcement Database have been checked to ensure that all relevant convictions have been declared.</p> <p>Relevant convictions were found and declared in the application. We considered relevant convictions as part of the determination process.</p> <p>Two relevant convictions representing breaches of regulations 38(1)(a) and 38(2) of the Environmental Permitting Regulations were issued against the operator in June 2019. The convictions relates to operating without a permit and breach of a permit condition. We have determined that the offences do not affect the operator's competence to the extent we would refuse the permit and therefore the operator satisfies the criteria in our guidance on operator competence. We will ensure that the relevant conviction history is taken into account during the compliance period.</p>
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
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</p>

Aspect considered	Decision
	the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation

The following summarises the responses to consultation with other organisations and our notice on GOV.UK for the public and the way in which we have considered these in the determination process. The application was advertised on the Environment Agency GOV.UK website from 28 October to 25 November 2019.

Responses from organisations listed in the consultation section

Representations from Kent County Council (Planning) dated 22/11/19	
Brief summary of issues raised	Summary of action taken / how this has been covered
<p>The County Council is of the view that the permit should take account of what is permitted and reflect what is in the planning permission i.e. annual throughput of 37,000 tonnes instead of the 45,500 tonnes applied for in the permit application.</p>	<p>The proposed installation will need to have both planning permission and an environmental permit to operate. The planning permission process considers the need, scope and scale of proposed developments in the context of local and regional plans and infrastructure requirements. The environmental permitting process considers the design and operational techniques associated with the plant in the context of its on-going operation against its stated purpose.</p> <p>The application is for the operation of an anaerobic digestion facility with a site annual throughput of 45,500 tonnes of waste and non-waste feedstock.</p> <p>If the applicant applies to vary their planning permission to increase the annual throughput from 37,000 tonnes to 45,500 tonnes and is unsuccessful, the applicant can either vary the permit to reflect the annual throughput stated in the planning permission or else appeal the planning decision.</p> <p>The planning permission process is completely independent to our process for determining an environmental permit. We have a duty to determine the application made to us and that is what we have done.</p>

Representations from Public Health England dated 25/11/19	
Brief summary of issues raised	Summary of action taken / how this has been covered
<p>PHE comment that the certificates of competency have not been included in the application.</p>	<p>The applicant submitted proof of technical competence during the determination. The operator is a member of an agreed scheme (WAMITAB). We are satisfied that the operator is technically competent.</p>
<p>PHE suggest that the bioaerosol control and mitigation measures, plans for mitigating noise and odours be reviewed, and if necessary, amended within three months of the site becoming operational.</p>	<p>The permit contains conditions which address the requirement to review site procedures if emissions from the installation are causing pollution (refer to permit conditions 1.1, 3.1 to 3.6 in the permit).</p>
<p>PHE recommend that the Environment Agency consult the following relevant organisations in relation to their areas of expertise:</p>	<p>We consulted the Kent County Council (Planning and Environmental Protection Department) and the Director of Public Health (Kent County Council). A summary of the responses is provided in this decision document. We have</p>

<ul style="list-style-type: none"> • the local authority for matters relating to impact upon human health of contaminated land; noise, odour, dust and other nuisance emissions; • the Food Standards Agency, where there is the potential for deposition on land used for the growing of food crops or animal rearing; • the Director of Public Health for matters relating to wider public health impacts. 	<p>not consulted the Food Standards Agency in accordance with our Working Together Agreement.</p>
<p>PHE recommend that the permit should contain conditions to ensure that the following potential emissions do not impact upon public health:</p> <ul style="list-style-type: none"> • Direct emissions to air from the AD facility; and • Fugitive emissions from waste handling and transfer on site. 	<p>We have included permit conditions to address these concerns (see conditions 3.1, 3.2, 3.3 and Table 3.1 in the Permit).</p>
<p>PHE has no significant concerns regarding risk to health of the local population from this proposed activity based solely on the information contained in the application, providing 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>The installation will be operated in accordance with the Waste Treatment BREF /BAT Conclusions, our Draft Technical Guidance for Anaerobic Digestion (Reference LIT 8737, November 2013) and H4 – Odour Management.</p>

<p>No representations received from:</p>
<ul style="list-style-type: none"> • Kent County Council (Environmental Protection Department) • Local Fire & Rescue Service • Director of Public Health (Kent County Council) • Health & Safety Executive • National Grid • Members of the Public