Notice of request for more information

The Environmental Permitting (England & Wales) Regulations 2016

The Company Secretary

Eco-Power Environmental Limited
Bankwood Lane Industrial Estate
Bankwood Lane
Rossington
Doncaster
DN11 0PS

Application number: EPR/EB3207LH/V005

The Environment Agency, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit duly made on 21 December 2018.

Send the information to either the email or postal address below by 15 October 2019. If we do not receive this information by the date specified then we may treat your application as having been withdrawn or it may be refused. If this happens you may lose your application fee.

Email address: psc@environment-agency.gov.uk.

Postal address:
Permitting and Support Centre
Quadrant 2
99 Parkway Avenue
Parkway Business Park
Sheffield
S9 4WF

Name	Date
Vicky Patchett	15/04/2019

Authorised on behalf of the Environment Agency

Notes

These notes do not form part of this notice.

Please note that we charge £1,200 where we have to send a third or subsequent information notice in relation to the same issue. We consider this to be the first notice on the issues covered in this notice.

The notes in italics that appear after information requests in the attached schedule do not form part of the notice. The notes are intended to assist you in providing a full response.

Fire Prevention Plan

You must consider the 'Fire Prevention Plans: environmental permits' guidance (updated 04/05/18), hereafter referred to as the guidance, and come to your own view as to what proposals you consider will meet the objectives to:

- minimise the likelihood of a fire happening;
- aim for a fire to be extinguished within 4 hours; and
- minimise the spread of fire within the site and to neighbouring sites.

You can follow the measures set out in the guidance and if you do so you will meet the objectives of the guidance and we are likely to approve your Fire Prevention Plan (FPP). If you do not include these measures you can propose alternative measures to meet the objectives. We will technically assess your alternative measures and, if we are satisfied that they meet the objectives, we can approve the FPP.

If your proposals do not meet the measures in the guidance, you should explain in detail the alternative measures you intend to take and how those measures can meet the objectives. This applies to each of the information requests in the attached schedule.

Schedule

Fire prevention plan

Please update the Fire Prevention Plan (document reference ECL.041.01.01/FPP) as follows:

1. **Demonstrate how you have considered the risks associated with non-waste combustible materials on site and provide mitigation proposals for fire prevention.**

   Reason: Section 3 of our Fire Prevention Plan (FPP) guidance states that although the guidance does not apply to non-waste materials such as gas cylinders, aerosols or combustible liquids, they must still be considered in the fire prevention plan because they can cause or increase the impact of a fire. The fire prevention plan site plan (document reference ECL.041.01.01.04) shows the diesel storage and wood storage locations but it is not clear if the wood storage is virgin wood used for fuel or waste wood accepted at the site. There is also no detail provided in the FPP about how non-waste combustibles should be managed to mitigate the risk of fire.

2. **Provide the monitoring and inspection checklists referenced in Table 3 of the FPP and demonstrate how these documents are incorporated into the FPP.**

   Reason: A number of checklists are referenced in table 3 of the FPP to demonstrate the preventative checks and measures that will be carried out on to site to reduce the fire risk. These documents should form part of the FPP for ease of reference as the FPP must be a standalone document in accordance with section 5 of our guidance.

3. **Submit a revised Fire Prevention Site Plan (document reference ECL.041.01.01-04) which includes the following features:**

   - **The location of all non-waste hazardous materials on site.**
   - **The location of the water hydrant**
   - **The location of the fire alarm system**
   - **The location of fixed plant e.g. trommel etc**
   - **The storage location of mobile plant when not in use (e.g. loading shovel, grab etc)**
   - **The storage location of Solid Recovered Fuel (SRF)/Refuse Derived Fuel (RDF)**
   - **The fire water containment bunding.**
   - **The drainage system, including direction of clean surface runoff flow, direction of contaminated runoff flow, type of surfacing (e.g. concrete areas, hardstanding tarmac) and location of tanks, penstock valves etc**
   - **Demonstration of the 6m separation distance or fire walls between all combustible waste piles, plant and the buildings and a 6m separation distance around the quarantine area.**

   Reason: The site plan submitted does not show the above features which must be included on the site plan in accordance with our FPP guidance. In regards to separation distances, the FPP guidance states that you must store your combustible waste piles with a separation distance of at least 6 metres and have a separation distance of at least 6 metres between waste piles and the site perimeter, any buildings, or other combustible or flammable materials. The site plan does not show that a 6m separation distance has been applied to wastes stored next to buildings or alternatively, that the building walls are fire walls that meet the requirements of section 11.2 of our guidance, nor does it show that a 6m separation distance will be applied to the quarantine area and vehicles in the lorry and car park. Table 3 of the FPP states that the fire alarm system is shown on the plan but it does not appear to be included.

4. **Provide annotated internal layout plans of ALL buildings used to store combustible wastes. The plan must show how the internal layout of buildings have been designed to ensure that fires can be extinguished easily. You must include the following:**

    - **6m separation distances or fire walls between piles of waste, plant and walls**
    - **Types of waste stored inside**
    - **Volume of each waste type stored inside**
    - **Location of fire alarms**
    - **Location of fire detectors**
    - **Location of fire suppression system.**

    Reason: The FPP plan document reference ECL.041.01.01-04 shows where part processed waste is to be stored within the proposed waste recycling building but it does not show how those wastes are stored in the building for accessibility in accordance with minimum separation distances in the FPP guidance. The FPP plan shows that there are to be two piles 440m^3 piles of unprocessed waste in that building. It does not explain what type of waste it will be, and one of those piles of wastes appears to be sited against an external building wall, when a 6m separation distance must be applied between the wall and the waste stockpile. It also does not clearly show where the shredder and trommel will be sited to show that those too are afforded a 6m separation from the waste stockpiles. The plan does not show the location of the fire alarms either. In addition, the layout of the baler building is not clear. It does not show if any waste is stored inside or the layout of plant and fire alarms. In both buildings you have shown where fire extinguishers will be located but you must also show where automated fire suppression is or will be located.

5. **Explain how the security of the site is monitored outside operational hours.**

    Reason: Table 3 of the FPP states that the site is covered by CCTV and that this is monitored by senior management but it is not clear if the CCTV is monitored out of hours or if other security measures are employed to alert staff to intruders on site.

6. **Demonstrate that plant will be stored away from stockpiles of waste when not in use throughout the day and not just at the end of the working day.**

    Reason: Table 3 of the FPP states that plant will be stored away from stockpiles of combustible waste at the end of the working day, but does not state that plant will also be kept away from waste stockpiles when not in use.

7. **Explain how the boilers will be managed as a potential source of fire.**

    Reason: The variation application includes the installation of 63 biomass boilers on site fired by virgin wood to dry SRF/RDF but the boilers themselves are not included in the FPP as a potential risk of fire.

8. **Demonstrate that a fire watch will be carried out on hot exhausts in accordance with our FPP guidance.**

    Reason: Section 7.7 of the FPP guidance states that for hot exhausts a fire watch should be carried out at regular intervals during the working day and also at the end of the working day. Whilst you have confirmed this for hot works, there is no mention in the FPP of a fire watch for hot exhausts.

9. **Explain how End-of-Life Vehicles (ELV's) accepted at the site will be managed and stored to reduce the risk of fires in accordance with our guidance.**

    Reason: Table S2.1 of the current permit allows the acceptance of de-polluted ELV's which are mentioned in Section 3.2.9 of the FPP to explain the type of combustible wastes the site can accept. However, the FPP does not explain how ELV's will be stored and managed to meet the requirements of sections 7.9 and 10.1 of our FPP guidance.

10. **Confirm that staff are trained to use spill kits.**

    Reason: The FPP states that spill kits will be used to clean up any spills of fuels and oils but it doesn't not confirm that staff will be suitably trained in their use.

11. **Provide the cleaning and house-keeping procedures for all plant and site areas and demonstrate that they are inspected and cleaned regularly to prevent the build-up of loose combustible waste, dust and fluff. Also demonstrate that the inspections are recorded.**

    Reason: Table 3 of the FPP explains that if required, plant will be subject to blow down at the end of the working day but no detail is provided about which plant this refers to or the regularity for cleaning inspections. The plan also does not explain about the cleaning and house-keeping procedures for the wider site to reduce loose waste, dust and fluff build up.

12. **The site is permitted to accept a wide range of wastes. You must demonstrate that you have considered all of the wastes that the site is permitted to accept and the potential for accepting incompatible wastes. You must explain how these wastes will be managed to prevent adverse reactions which may represent a fire risk.**

    Reason: Table 3 of the FPP states that strict waste acceptance procedures are in place to ensure that only permitted wastes are accepted, which will ensure that incompatible wastes will not enter the site. However, the site is permitted to accept a wide range of wastes which may be incompatible if not stored appropriately. You must review the list of permitted wastes and consider if there are wastes that need separate storage arrangements to ensure that they do not lead to reactions which could lead to a fire on site.

13. **Provide a detailed breakdown of the types of combustible wastes handled onsite and describe how they will be stored.**

    You must clearly identify all types of combustible wastes and their storage arrangements to ensure that anyone following the FPP is clear about their management to reduce the risk of fire on site. You should refer to sections 8, 9 and 10 of the FPP guidance.

    In your response you must include the following as a minimum:

    - **The waste types accepted that are considered combustible**
    - **The wastes considered combustible after they are processed (loose and baled waste and waste fines)**
    - **The maximum storage duration for each type of combustible waste both prior to and after processing**
    - **The maximum pile size for each waste type both prior to and after processing taking into account the form of the waste.**
    - **The maximum quantity of each type of combustible waste stored on site**
    - **How the movement, processing and storage of waste is tracked and recorded to ensure the oldest waste is processed first.**

    Reason: The FPP lacks detail on the above issues and shows inconsistencies in the information that is provided. For example, Table 3 of the FPP states that unprocessed and processed wastes will be stored in stockpiles, stacks etc for no longer than 3 months. It then states that combustible wastes will be stored on site no longer than 1 week. Section 6.5.4 of the FPP states that the maximum pile size will be 400m^3, however the site plan ECL.041.01.01-04 shows some piles of wastes will be 720m^3 (20x9x4m). Types of combustible waste are mentioned briefly in section 3.2.9 of the FPP but no specific detail is provided about the form of the waste i.e. particle size (other than baled metal on the site plan) to demonstrate storage can meet the requirements of the FPP guidance. Enough detail about the wastes should be provided so as to demonstrate that the site can meet the requirements in Sections 8, 9 and 10 of the FPP guidance.

14. **Explain how you will manage the risk of wastes being heated during the treatment processes to prevent introducing a heat source to combustible waste. Please address the points in Section 8 of the FPP guidance.**

    Reason: Table 3 of the FPP states that visibly hot loads will not be accepted or processed on site and so a quarantine area for hot loads is not necessary. However, the FPP must consider in more detail the management of specific wastes that may be subject to heating following treatment. For example, wastes treated in shredders may heat up during the treatment process and may need to be isolated from other wastes to allow cooling before storage/baling. Fines and metals may also be subject to heating and the drying of waste which could introduce a heat source to combustible wastes.

15. **Explain how you will ensure that waste containers remain easily accessible and how in the event of a fire they will be moved to isolate the fire and prevent it spreading.**

    Reason: The FPP guidance states that if containers can store more than 1100 litres of waste, you must ensure that they are easily accessible and can be moved as soon as reasonably practicable to prevent the fire spreading. The FPP plan (document reference ECL.041.01.01-04) shows that a number of wastes will be stored in containers but no information is provided in the FPP document to explain how they will be managed for accessibility and isolated in the event of a fire.

16. **Explain how you will manage wastes stored outside to mitigate external heating during hot weather.**

    Reason: The FPP does not explain if wastes stored outside will be susceptible to external heating sources and if so, how they will be managed to prevent heating.

17. **Explain how the fire alarm system has been designed to detect fires outside. If the system does not detect fire outside the buildings, explain what alternative measures are in place to detect external fires out of operational hours.**

    Reason: The FPP confirms that a fire alarm system is already installed and will be extended to cover the proposed waste recycling building but it does not demonstrate that the system has the ability to detect fires outside the buildings in line with the requirements of the FPP guidance.

18. **Explain how you will ensure that the quarantine area situated in the lorry and Car Park will remain accessible at all times so that waste can be moved to it as soon as possible or at the most within 1 hour of a fire starting.**

    Reason: The FPP plan (document reference ECL.041.01.01-04) shows the quarantine area located in the lorry and car park area. It is not clear on the plan or from the description of the quarantine area in Section 3.3.7 of the FPP how the quarantine area will be kept accessible so that it can be used as required in section 12 of the FPP guidance.

19. **Provide evidence that the fire alarm system is designed, installed and maintained by a UKAS accredited third-party certification scheme.**

    Reason: Table 3 of the FPP states that the fire alarm system is designed, installed and maintained by UKAS accredited third-party certification scheme but no evidence has been provided to confirm this.

20. **Demonstrate that ALL buildings used to store wastes have a fire suppression system that is capable of extinguishing a fire within 4 hours. You must include justification for the suppression system based on the nature and scale of the operations carried out, and provide evidence that the system will be designed, installed and maintained by a UKAS accredited 3rd party scheme.**

    Reason: In section 14 of our FPP guidance you are asked to demonstrate that buildings storing waste have an appropriate fire suppression system. The system must be capable of enabling a fire to be extinguished within 4 hours, which includes preventing the spread of fire to allow the fire service to fight the fire effectively. In Table 3 of the FPP, you have stated that a fire suppression system will be installed in the new waste recycling building 'if appropriate'. This statement does not

adequately demonstrate that an appropriate suppression system is in place in accordance with our guidance. You must consider all buildings used to store waste and demonstrate that your suppression system is covered by a UKAS accredited 3rd party certification scheme.

21. **Demonstrate with calculations, that the proposed water supply is capable of providing at least 2000 litres of water per minute over 3 hours based on the largest waste pile. Where information has previously been provided in an approved version of the FPP for the current permitted operations, you must review the supply and demonstrate that it is still relevant based on the proposed expanded operations.**

    Reason: Section 6.5.4 of the FPP addresses water supply. It states that based on a 400m³ stockpile of waste, 480,000 litres of water would be required. However, no evidence or calculations have been provided in the plan to demonstrate that the hydrant is capable of providing the volume required, nor does it take into account that the largest pile of waste shown on the FPP layout plan is 720m³ and not 400m³.

22. **Demonstrate that the volume and extent of the fire water containment area afforded by the impermeable pavement and bunding can adequately contain the volume of firewater that may be produced.**

    Reason: Section 6.5.1 of the FPP states that the site has an impermeable pavement with a concrete containment bund and wall enclosing the site boundary which prevents escape of firewater off site. Section 6.4.1 of the FPP states that a temporary bund (firewater booms) will be deployed to ensure that firewater is kept within the building which benefits from impermeable surfacing, or that a designated area which would limit overland flow to prevent the percolation of firewater into the ground. These statements appear to be contradictory, with one suggesting that the site has an impermeable surface and bunding to contain firewater and the other suggesting that areas outside of the buildings are not impermeable. Further to this, the size of the firewater containment area has not be confirmed to demonstrate that it is capable of holding the potential volume of fire waters generated.

Site drainage and containment

23. **To demonstrate that areas containing waste will be continuously served by a fully impermeable, sealed drainage system, submit detailed construction designs of the drainage, impermeable surfacing and bunding that you intend to progressively install in the extended areas of the site. You must be able to demonstrate that potentially contaminated surface waters cannot escape off site during construction.**

    Reason: Section 3.3.2.1 of the Environmental Risk Assessment states that the extended area will be progressively surfaced with concrete and bunded to provide an impermeable base. However, no detail has been provided with the application to explain how the surfacing is designed and will be progressively installed to ensure impermeability, nor has information been provided about the size of the bund. This information is required to demonstrate that potential run-off or standing waters in waste storage areas cannot leak into the subsurface and underlying Principal aquifer and SPZ 3. This is especially important as the waste storage areas do not have a surface water drainage system.

24. **Confirm in line with our risk assessment web guidance https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-to-water how surface water will be managed to prevent accumulation in operational areas of the site.**

    Reason: Section 3 of the of the Environmental Risk Assessment (document reference ECL.041.01.01/ERA) and section 4 of document Technical Requirements document, ref ECL.041.01.01/EPTR, explain that the operational areas of the site are isolated from the drainage system with all surface water being prevented from running off site by the concrete containment bund. It also explains that rainfall onto the operational areas will either be soaked up by waste or evaporation which is not an adequate water management proposal. Without a surface water

management system there may be accumulation of waters on site which could lead to issues such as odours, pests and inaccessibility to operational areas.

25. **Provide a copy of the emergency action plan and spill procedures referenced in section 3.3.2.2 and 3.4.1.2 of the Environmental risk assessment (document ref ECL.041.01.01/ERA)**

    Reason: The emergency action plan and spill procedure are referenced as outlining procedures for preventing any spills from entering the surface water drainage or groundwater but these documents have not been provided to demonstrate that the procedures are appropriate.

Air Quality Assessment

26. **Provide a revised air quality impact assessment which identifies and assesses all designated habitats and conservation sites within 10km of the facility. Please also provide the associated model input files.**

    Reason: The WYG air quality impact assessment dated May 2018 does not include all designated habitat and conservation sites within the relevant screening distance for an installation activity (10 km for SACs, SPA's and Ramsars and 2 km for SSSIs, Local Nature Reserves, Local Wildlife Sites and Ancient Woodlands). There are two Designated Sites within 10 km of the facility that have not been included in the assessment; Hatfield Moor SAC and Thorne & Hatfield Moors SPA. There are also a number of Local Wildlife Sites and Ancient Woodlands within 2km of the site that have not been identified in the report. A habitats screening report is attached to this Schedule 5 for your information. See further guidance on air emissions risk assessment and dispersion modelling: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit

Noise assessment

27. **Provide a noise impact assessment (modelling) using an appropriate noise method such as BS 4142:2014 'Methods for rating and assessing industrial and commercial sound' to assess the risk of noise sources identified onsite and justify the mitigation measures you are proposing in the noise management plan (document reference ECL.041.01.01.01/NMP).**

    Reason: A noise management plan (document ref: ECL.041.01.01/NMP) has been submitted with the application which includes measures for mitigating noise. Our guidance on gov.uk states that you must complete your noise assessment and management plan using an appropriate noise standard such as BS 4142:2014 'Methods for rating and assessing industrial and commercial sound', however the document submitted does not include an appropriate assessment. Please refer to our guidance on noise risk assessment for further information: https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#noise-and-vibration-management-plan

Best Available Techniques (BAT)

When referring to BAT in the following questions, the BAT documents of reference are:

- **Sector Guidance Note IPPC S5.06 Guidance for the Recovery and Disposal of Hazardous and Non Hazardous Waste;**
- **Best Available Techniques (BAT) Reference Document for Waste Treatment Industrial Emissions Directive 2010/75/EU (Integrated Pollution Prevention and Control) (2018); and**
- **BAT conclusions for waste treatment 2010/75/EU dated August 2018.**

Pre-acceptance of waste

28. **Demonstrate that prior to accepting a new waste at the installation, a representative sample(s) will be obtained to compare against the description provided by the waste holder.**

    Reason: Indicative BAT no 2 in Section 2.1.1 of SGN 5.06, states that the pre-acceptance checks in every case should require a sample of the waste to be obtained to compare with the written description. Section 4.6 of your Technical Requirements document, ref ECL.041.01.01/EPTR does not confirm that a sample of the waste will be obtained.

29. **Confirm that all records relating to waste pre-acceptance will kept at the site for a minimum of three years.**

    Reason: Indicative BAT no16 in section 2.1.1 of SGN 5.06 states that records must be kept for a minimum of 3 years. Section 4.6.8 of your Technical Requirements document states that records will be kept for a minimum of 2 years.

Waste acceptance procedures

30. **Confirm how and where rejected wastes at the installation will be quarantined until they can be sent off site. Please refer to Indicative BAT no 16 of section 2.1.2 and BAT no 2 of section 2.1.3 of SGN5.06 for quarantine requirements. Please also refer to the Fire Prevention Plan guidance section on quarantine areas and if you are intending to use only one quarantine area on site, demonstrate how you will manage both general and hot/burning load quarantine.**

    Reason: Section 4.7.6 of the Technical Requirements document explains the rejection procedure for the site and states that non confirming waste will be sent off site immediately, however, in practise this may not be always be possible. A dedicated quarantine area is shown on the fire prevention plan plan ECL.041.01.01-04 but no detail is included in the Technical Requirements document to explain if this area is also to be used for general quarantining and not just the quarantining of hot/burning loads.

31. **In accordance with BAT indicator no 20 and 21 of section 2.1.2 in SGN5.06, confirm where the designated waste reception area is and demonstrate that it is served by an impermeable surface with sealed drainage. You must also include any holding areas such as the lorry park and explain how the waste acceptance process is managed in those areas.**

    Reason: Section 4.7 and 4.8 of the Technical Requirements document does not identify a specific waste reception area, rather waste is inspected and received at the weighbridge and then directed to the appropriate waste storage/treatment area. There is no mention of the role of the lorry park in potentially holding waste until such a time that it can be received in the appropriate area of the site as is suggested in point 8.58 and 8.59 of Doncaster Metropolitan Borough Council Planning Committee reported dated 19 October 2018.

32. **Confirm that in addition to the supplier of a rejected waste being notified, the Environment Agency will also be notified.**

    Reason: Indicative BAT no 34 of section 2.1.2 in SGN5.06 states that the Environment Agency must also be notified in the event that wastes have to be rejected but your Technical Requirements document only refers to the supplier being notified.

33. **Demonstrate you have a system in place to track waste received at the installation. You must ensure the method covers the information set out in Indicative BAT no 35 and no 37 in section 2.1.2 of SGN5.06 as minimum.**

Reason: *Section 4.7 of your Technical Requirements document explains that there is a tracking system in place for rejected wastes and identifies in Section 4.7.3 a number of aspects that will be recorded upon waste acceptance. There is however no reference to the waste tracking that occurs after this, such as tracking where each load is sent for storage/processing and its onward movements to enable you to know exactly how much waste is on site at any one time, and where that waste is in the treatment process. The tracking system must hold all the information generated during pre-acceptance, acceptance, storage, treatment and/or removal off-site.*

Waste storage

34. **Explain how you will eliminate or minimise unnecessary handling of waste during the pre-treatment prior to incineration operations, associated waste storage operations and resulting storage of SRF/RDF in order to meet the requirement of BAT 4a of the BAT conclusions.**

    As a minimum you must give a full description of the handling arrangements for the following:

    - **How you will store waste prior to shredding**
    - **How you will store produced SRF/RDF**
    - **All other movements around the site which facilitate the SRF/RDF treatment process**

    Reason: *Indicative BAT no4a requires that waste is stored in such a way so as to eliminate or minimise unnecessary handling of wastes. The Technical Requirements and FPP documents do not explain how the storage arrangements for the pre-treatment prior to incineration operations meet BAT, for example, it does not explicitly state prior to the shredding and drying operations where or how wastes are stored or where they are stored once treated. Section 4.9.2 of the Technical Requirements document does however state that wastes will soak up clean surface waters on site but does not explain what these wastes are. If this includes wastes that will be dried to produce RDF/SRF, the storage of those wastes would not be in accordance with BAT as additional drying would be required beyond what would normally be expected to improve the calorific value of the waste, due the waste being exposed to the elements.*

35. **Submit a site plan annotated with the maximum storage capacity for each individual waste storage area at the installation.**

    Reason: *Indicative BAT no 9 in section 2.1.3 of SGN5.06 states that the maximum waste storage capacity and volumetric calculations must be clearly stated in writing and set out in the site plan. Whilst you have referred to section 4.8 of the Technical Requirements document and the Fire Prevention Plan, neither of these documents show the maximum storage capacity and volumetric calculations for* ***all wastes*** *at the installation (and not just combustible wastes as shown in the current fire prevention plan). The site layout plan ECL.041.01.01-02 also does not show the storage location or storage capacity of RDF and SRF.*

36. **In regards to inspection and maintenance of storage areas and site infrastructure, demonstrate that bunds, tanks, storage vessels/containers will form part of the inspection regime and that they will be regularity inspected and maintained to ensure good condition**

    Reason: *Indicative BAT no 12 of section 2.1.3 of SGN 5.06 states that procedures must be in place for regular inspection and maintenance of storage areas including pavements, bunds, storage vessels, drums etc. Whilst section 4.9.4 of the Technical Requirements document states that a regime is in place to inspect impermeable hardstanding and the condition of side walls and fences, it does not include reference to the inspection of bunds, storage vessels/containers nor does it state how regularly those checks are carried out.*

37. Confirm that waste will not be held in the waste reception area for longer than 5 days.

Reason: Indicative BAT no 18 states that storage within the waste reception area must be for a maximum of 5 working days. You have referred to your Technical Requirements document and the fire prevention plan to address this but neither documents explains how you will utilise the waste reception area and any storage timescales.

38. Provide BAT justification for avoiding the accumulation of aged waste in containers at the installation as specified in indicative BAT no 24 of section 2.1.3 of SGN5.06

Reason: No BAT justification has been provided for the storage of aged waste which may be relevant to RDF and SRF storage. As SGN 5.06 is the relevant guidance for your sector you are required to go through each of the relevant BAT points and demonstrate how you will operate your installation activities in line with each of the requirements of this guidance.

Waste Treatment

39. Demonstrate how the stages of the pre-treatment prior to incineration activity including shredding, drying, blending and baling process as outlined in the flow diagram submitted to us on 28/11/18, have been designed and will be operated in line with the BAT principles and each indicative BAT point outlined in section 2.1.4 of SGN 5.

Reason: Your Technical Requirements document does not explain in detail how you have considered the installation waste treatment processes in accordance with Indicative BAT for waste treatment – general principles. As SGN 5.06 is the relevant guidance for your sector you are required to go through each of the relevant BAT points and demonstrate how you will operate your activities in line with each of the requirements of this guidance.

Point source emissions to air

40. Identify processes with significant odour risk at the installation and determine which odour abatement systems are appropriate.

You must take into the account the BAT conclusions for storage and treatment of odorous wastes in BAT 10, BAT 13 and BAT 14, including treatment of wastes with calorific value as per BAT 31 and BAT 45 in the BAT conclusions for waste treatment document (2010/75/EU) 2018. This must include shredding, drying and storage of wastes as a minimum.

You must provide extensive evidence and justification for not providing abatement for high risk odour sources. For the installation you must also provide a BAT justification as to why this is the most appropriate technology.

Reason: Your Technical Requirements document does not explain how odours will be contained and abated in accordance with BAT conclusions for storage and treatment of odorous wastes in BAT 10, BAT 13 and BAT 14, including treatment of wastes with calorific value as per BAT 31 and BAT 45 in the BAT conclusions for waste treatment document (2010/75/EU) 2018.

41. Identify processes with significant dust risk at the installation and determine which abatement systems are appropriate.

You must take into the account the BAT conclusions for mechanical and physico-chemical treatment of wastes in BAT 8, BAT 14, BAT 25 and BAT 31 in the BAT conclusions for waste treatment document (2010/75/EU) 2018. This must include shredding and drying of wastes as a minimum.

You must provide extensive evidence and justification for not providing abatement for high risk sources. For the installation you must also provide a BAT justification as to why this is the most appropriate technology.

Reason: Your Technical Requirements document does not explain how dusts will be contained and abated in accordance with the BAT conclusions specified.

42. Where your responses to questions 40 and 41 above indicate that abatement is required for the control and treatment of dust and odour emissions to air you must demonstrate you can meet the indicative BAT requirements specified in section 2.2.1 of SGN5.06.

Reason: To demonstrate that the installation can meet the Indicative BAT requirements for emissions to air from abatement plant.

Fugitive emissions to water

43. Demonstrate that the IBC's referred to in section 9.4.3 and 9.4.4 of the Technical Requirements document are served by secondary containment which a suitable type, size and standard. Please refer to CIRIA C736 for guidance.

Reason: You have stated that the IBC's containing Adblue and Hydrodotr are appropriately bunded but you have not confirmed what type of bunding is in place and that is at least 110% of the capacity of the IBC's.

44. Demonstrate that the secondary containment bunding in place for the diesel tank is designed to a suitable type, size and standard to contain 110% of the tank contents.

Reason: Section 9.4.2 confirms that the diesel tank is bunded to 110% of the tanks capacity but it does not confirm what type of bunding is in place. Please refer to CIRIA guidance C736 for appropriate types of bunding.

Raw materials

45. In accordance with section 2.4.1 of SGN5.06 provide a full list of all the raw materials used at the installation and for each material confirm the following:

- **the quantities used**
- **chemical composition**
- **fate of the material within the installation**
- **environmental impact**
- **reasonably practical alternatives considered**
- **justification for the use of the material where less hazardous alternatives are available**

Reason: A number of raw materials are identified in Section 9.4 of the Technical Requirements document but this list is not exhaustive, for example it does not include oils or lubricants which would be required to maintain plan or materials such as baling wrap etc. The raw materials justification also does not include the detail as set out in SGN5.06 which is required to explain why those materials were chosen above others.

Waste minimisation audit

46. In line with Section 2.4.2 of SGN5.06 describe the methods in place to minimise not only wastes being treated at the installation but also wastes generated at the installation through the use of raw materials and other substances as part of your operations

Reason: Section 2.4.2 of SGN5.06 requires that you have a systematic approach to look for waste minimisation opportunities. In section 9.5 of your Technical Requirements document you address

only a number of the potential waste minimisation opportunities that may arise at the installation. For example, you have not addressed raw material use, water, baling wrap etc.

Water use

47. In accordance with Section 2.4.3 of SGN5.06 on water use, demonstrate how your water use at the installation complies with all indicative BAT specified in that section.

Reason: You have not included an assessment of water use at the installation. Although you do not have emissions to water, you are still required to demonstrate how you will minimise water use for those operations which require water such as the boilers, dust suppression techniques, float/sink tank etc.

Disposal and recovery

48. In line with section 2.6 of SGN5.06, for all wastes generated or produced at the installation that are destined for disposal, explain why recovery is technically and economically unfeasible and describe the measures planned to avoid or reduce any impact on the environment. You must include the following wastes as a minimum:

- **Waste outputs produced following treatment at the installation**
- **Waste waters generated**
- **Wastes generated through the use of plant/equipment/abatement.**

Reason: Section 9.5 of the Technical Requirements document addresses waste minimisation and identifies biomass boiler ash and 1% of the annual throughput of waste being destined for landfill. However, it does not explain in detail what recovery options have been considered for these wastes, nor does it explore all of the wastes that may be produced at the facility such as waste oils, waste waters etc and their final destinations.

Energy efficiency

49. Demonstrate that the installation can meet the Indicative BAT requirements in section 2.7 of SGN5.06 and BAT no 23 of the BAT conclusions for waste treatment (2010/75/EU) 2018. You must provide the following as a minimum in accordance with BAT:

- **A breakdown of the energy consumption and generation by individual source and the associated environmental emissions – see section 2.7.1 of SGN5.06**
- **The proposed measures for improvement of energy efficiency – see section 2.7.2 of SGN5.06**
- **Demonstrate the degree to which the further energy-efficiency measures identified in the implementation plan have been taken into consideration and justify where they have not – see section 2.7.3 of SGN5.06.**

Reason: Section 9.1 of the Technical Requirements document addresses the energy efficiency measures at the installation, however it does not provide the level of detail or documentation required to demonstrate that the installation will be operated in accordance with BAT.

50. Specifically demonstrate why 63 <1MWth biomass boilers are more efficient than one or two larger boilers for drying waste.

You must compare the following:

- **The energy consumption and associated emissions**
- **The energy efficiency**
- **Which engine technology is the best option**

Reason: You propose to use 9 sets of 7 Angus Orland Super 130kw biomass boilers, resulting in 63

boilers being used on site. The total net rated thermal input for the plant equates to 8.19MW, which could be achieved using larger, more efficient plant. No justification has been provided to explain why a large number of smaller boilers are the most efficient in accordance with indicative BAT energy efficiency measures, and that other larger boilers have been considered before opting for the proposed technology.

Accidents

51. **Provide a copy of the Accident Management Plan (AMP) referenced in section 3.5.12 of the Technical Requirements document and demonstrate the plan complies with Indicative BAT in section 2.8 of SGN5.06.**

    Reason: You have stated that the AMP forms part of the EMS and will be updated but you have not provided a copy with the application and demonstrated that the plan meets Indicative BAT standards.

Pest management plan

We will require a revised pest management plan amended to address the question outlined below. For assistance refer to our Fly Management Guidance (Version 3 15 June 2018) and our online guidance 'Control and monitor emissions for your environmental permit' on gov.uk (updated 8 November 2018).

52. **Provide the plans referenced in sections 2.1.1 and 4.1.3 of the pest management plan (PMP)**

    Reason: Amenity Management plans are standalone operational documents that outline all relevant information and include all site plans required to enable site operatives to implement effective monitoring control measures in specified locations.

53. **Provide a detailed assessment of the potential sources of pests at the facility. As a minimum you must look at the following:**

    - **The potential sources of pests at each stage of the process from the pre-acceptance stage right through to final off site dispatch.**
    - **Identify specific wastes that are likely to attract pests**
    - **Identify specific activities that are likely to attract pests**

    Reason: Section 3.1 of the PMP identifies generic sources of pests but this not specific to the site operations and does not include enough detail. The assessment must be exhaustive to identify all potential sources of pests on site so that a thorough risk assessment and monitoring and management regime can be established.

54. **Provide a detailed assessment of the type of pests likely to be present on site and the problems that those pests can cause.**

    Reason: The PMP briefly mentions flies and rodents in section 3.1.1 of the plan but there is no detailed assessment of the pests likely to be present on site based on the wastes accepted and the operations carried out.

55. **Identify potential sensitive receptors based on the behaviour of the different type of pests and how far those pests could disperse off site. Where additional receptors are identified, you must also submit an amended sensitive receptor plan (drawing ref: ECL.041.01.01-03).**

    Reason: There is no description of the behaviour of the pests identified and the risks they may pose to sensitive receptors off site due to the nature of their behaviour.

56. **Taking into account the potential sources of pests identified above, provide a detailed explanation of how the presence of pests will be prevented and managed on site. This must include at least one control measure for each individual source and each type of pest.**

For flies, please refer to section 5.1.5 and 5.2 of the fly management guidance. For other pests please refer to our online guidance.

Reason: Section 5 of the PMP provides a brief overview of the prevention and control of pests on site, but this does not provide enough specific detail about the site operations to demonstrate a full understanding of the potential for pests to arise and how they will be controlled. For example there is a general reference to waste and site operations, but no reference to specific waste streams or conditions for their control. There is mention of quarantining waste, but no specific detail about how the waste should be successfully quarantined or where. You must provide a detailed explanation of how pests will be prevented looking at high risk wastes and activities and demonstrate the appropriate measures that will need to be employed to control them.

57. **Provide a site specific monitoring regime, which includes:**

    - **Locations and activities where monitoring will take place**
    - **Signs of pests that will trigger operatives to take action**
    - **For each pest identified above, the actions to then be taken to resolve any issues identified.**

    Reason: The daily monitoring check sheet provided in Appendix I of the PMP is a generic monitoring checklist for the wider site. It does not focus on the specifics of monitoring for pests, triggers for action and the actions to then be taken. A pest specific monitoring regime must be established and implemented through the PMP.

58. **For each source of pests identify emergency scenario contingency measures that will be implemented on site to manage pests in the event of an accident/unexpected incidents such as fire, flooding, breakdown and staff absences.**

    Reason: The PMP does not consider how the risk of pests might be impacted in the event of emergencies, incidents, change in markets etc. As unexpected events may affect how source materials or operations are managed on site, contingency arrangements must be clearly stated and in place.

59. **Confirm what actions will be taken in the event of a complaint/s regarding pests. You must include the following as a minimum:**

    - **a full description of how you will respond to complaints**
    - **timescales for completing any investigation and any follow up actions**
    - **Reporting of complaints**
    - **Providing feedback to the complainant**
    - **How you will escalate complaints when a number of complaints are received.**
    - **At what point you will cease operations if numerous complaints are received.**

    Reason: Section 6 of the PMP describes the complaints procedure. In section 6.1.1 it states that a complaint will be fully investigated and then goes on to list a small number of actions that will be carried out to investigate the complaint. The complaints procedure must clearly set out how you will investigate the complaint, follow up any actions, report it, escalate it, and engage with the complainant and how you will deal with numerous complaints such as ceasing operations.

60. **Explain how you will take proactive steps to engage with the community following a complaint and to prevent complaints in the first instance.**

    Reason: In section 6 of the PMP you have stated how you will respond to complaints which includes investigation and substantiation of the compliant. However, you have not explained how you will engage with the community following a complaint and the steps that will be taken to pro-actively engage the community to prevent complaints in the first instance.

61. **Confirm that in addition to the annual review, the PMP will be reviewed in the event that pest control measures fail.**

    Reason: *In section 7 of the PMP you state that the PMP will be reviewed annually, however a review must also be undertaken if it is clear that pest control measures are not working.*

62. **Confirm who is responsible for ensuring the PMP is implemented and complied with.**

    Reason: *There is no reference in the PMP to a competent person overseeing the implementation of the plan.*

Odour management plan

We require a revised odour management plan, which has been amended to address the requirements of the questions below.

For assistance refer to our H4 Odour Management guidance dated March 2011 and for the installation refer to Indicative BAT requirements for odour control in Section 2.2.6 of SGN5.06 and Best Available Techniques (BAT) conclusions for waste treatment dated August 2018.

63. **Provide a detailed assessment of the potential odour sources at the facility and assign a level of risk in accordance with the odour descriptions in our H4 guidance.**

    The assessment must include the following as a minimum:

    - **The potential sources of odour at each stage of the process from the pre-acceptance stage right through to final off site dispatch.**
    - **Identification of the level of risk for each waste type**
    - **The quantities present on site for each waste type**
    - **The high odour risk activities such as drying, shredding, storage and seasonal variations.**

    Reason: *Whilst levels of odour have been stated in Section 3 of the OMP, these have not been applied to the inventory of wastes in Table 4, so it is not clear that an individual assessment of the odour risk for each type of waste has been carried out. Further to this, the OMP does not identify other sources of odour on site such as those arising from treatment and storage.*

64. **Provide an assessment of the potential sensitive receptors which could be impacted by the site. This must include:**

    a) Identification of all sensitive receptors individually. This could be submitted on a map which includes directions and distances. Examples of relevant receptors are available on our website https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#identify-receptors

    b) Assign a risk based on the type of receptor, location in relation to the site, proximity to high risk odour sources and predominant wind direction.

    Reason: *Section 2 of the OMP identifies the sensitive receptors in Table 1 but this is not a detailed description or assessment based on the risk of odours at the site or the site setting.*

65. **For each individual odour source, taking into account the level of associated risk, identify and describe the control and mitigation measures you will implement to manage odour.**

    This must not include any vague terminology e.g. 'regular', 'if appropriate'. You must state exact timescales and frequencies.

    Please note where control and mitigation is proposed via a building, you must explain how the building has been designed to control odours, including any specific features such as negative aeration, fast action doors and abatement.

Reason: *Your current procedures are too generic for example you mention that where possible waste will be stored within a building and the doors will be closed when not in use. Also it is not adequate to simply state 'where possible'. You must provide specific detail for each individual odour source to demonstrate how they will be controlled and managed to prevent odours off site.*

66. **Provide a clear monitoring plan to demonstrate how you will monitor all odour sources to ensure emissions remain under control. This must include:**

    - **Defined triggers to indicate when operatives must take action to bring odour emissions back under control.**
    - **Identification of monitoring points and justification as to why these are appropriate taking into account high risk sources and receptors.**
    - **Monitoring technique/s, frequency and time of monitoring accounting for high risk operating periods.**
    - **Monitoring check sheet in line with H4 odour management guidance.**

    Reason: *Table 5 of the OMP identifies that olfactory monitoring will be carried out and a site monitoring check sheet is provided in Appendix I, however, there is no detail about triggers to indicate when action is needed, where and exactly how monitoring will be carried out and how this monitoring will be checked and logged accurately. You must provide a clear and detailed monitoring plan so that an operative knows exactly how to monitor and rectify any odours arising on site.*

67. **Describe the contingencies plans you will implement to bring odorous emissions back under control in the event day to day measures are failing and odorous emissions exceed triggers defined in the monitoring plan. This must identify and describe contingency measures for each individual odour source and define triggers for implementing and stopping the contingency measures once odour is deemed to be back under control.**

    Reason: *The OMP does not provide a contingency plan for the individual odour sources on site. Table 5 provides some very general contingency measures but it would not be possible for an operative to understand what actions they should take for individual sources to bring odorous emissions back under control.*

68. **Where your assessment has identified that an odour abatement system is needed to control odorous emissions at the facility, you must provide the following detail for each abatement system:**

    - **Gases input – full breakdown of the odorous components and properties of the air stream e.g. concentration, humidity, pH**
    - **Treatment mechanism – description and design**
    - **Process parameters for optimum treatment**
    - **Process monitoring**
    - **Maintenance of abatement and containment system**

    Reason: *The OMP does not describe how odours will be contained and abated and how the abatement system will be monitored and managed.*

69. **Identify emergency scenario contingency measures that will be implemented on site to manage odour in the event of an accident/unexpected incidents such as fire, flooding, breakdown and staff absences.**

    Reason: *The OMP does not consider how the risk of odour might be impacted in the event of emergencies, incidents, change in markets etc. As unexpected events may affect how potentially odorous materials are managed on site, contingency arrangements must be clearly stated and in place.*

70. **Confirm what actions will be taken in the event of a complaint/s. You must include the following as a minimum:**

    - **a full description of how you will respond to complaints**
    - **timescales for completing any investigation and any follow up actions**
    - **Reporting of complaints**
    - **Providing feedback to the complainant**
    - **How you will escalate complaints when a number of complaints are received.**
    - **At what point you will cease operations if numerous complaints are received.**

    *Reason: Section 6 of the OMP describes the complaints procedure. In section 6.2.1 it states that a complaint will be **fully** investigated and then goes on to list actions that **may** be taken to investigate the complaint. If investigating a complaint, at least all of the actions above must be taken as part of the investigation. The complaints procedure must clearly set out how you will investigate the complaint, follow up any actions, report it, escalate it, and engage with the complainant and how you will deal with numerous complaints such as ceasing operations.*

71. **Explain how you will take proactive steps to engage with the community as per section 4.6 of the H4 odour management guidance.**

    Reason: In section 6 of the OMP you have stated how you will respond to complaints but you have only briefly mentioned in section 6.2.3 that 'if required' you will attend resident liaison meetings to explain how the preventative and corrective measures have been addressed. This does not explain how you will take pro-active steps to engage with the community to prevent complaints in the first place.

72. **In additional to annually, confirm that the OMP will be reviewed in the event that odour control measures fail.**

    Reason: In section 7 of the OMP you state that the OMP will be reviewed annually, however a review must also be undertaken if it is clear that odour control measures are not working.

73. **Confirm who is responsible for ensuring the OMP is implemented and complied with.**

    Reason: There is no reference in the OMP to a competent person overseeing the implementation of the OMP.

Emissions management plan

We require a revised emissions management plan which has been amended to address the requirements of the questions below.

Please refer to our online emissions management plan guidance https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#emissions-management-plan (updated November 2018).

74. **Provide an assessment of the potential receptors which could be impacted by the site. This must include:**

    a) Identification of all sensitive receptors individually. This could be submitted on a map which includes directions and distances. Examples of relevant receptors are available on our website https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit#identify-receptors

    b) Assign a risk based on the type of receptor, location in relation to the site, proximity to high risk fugitive emission sources and predominant wind direction.

Reason: *Section 2 of the Emissions management plan (EMP) identifies the sensitive receptors in Table 1 and refers to the site location plan in the application, but this is not a detailed description or assessment based on the risk of dust and litter at the site and the site setting.*

75. **Provide a detailed assessment of the potential emission sources at the facility and assign a level of risk of causing adverse emissions e.g. high, medium or low.**

    The assessment must include the following considerations as a minimum:

    - **The potential sources of fugitive emissions at each stage of the process from the pre-acceptance stage right through to final off site dispatch.**
    - **The physical nature of wastes accepted**
    - **How each waste type is accepted into and dispatched from the site e.g. enclosed lorry/skip etc**
    - **How each waste type is stored**
    - **The quantities of each waste type present on site**
    - **The activities each waste is subjected to i.e. drying, screening, shredding and storage conditions.**

    Reason: *Whilst potential dust and litter sources have been stated in Section 3 of the EMP, the list does not provide a detailed breakdown of the sources to demonstrate why those sources are high risk, nor does it identify specific high risk waste types so that operatives referring to the EMP understand which sources are a risk and why.*

76. **Submit a site layout plan showing the following. This must be accompanied by a detailed explanation to demonstrate how the layout has been designed to minimise emissions:**

    - **Site infrastructure**
    - **Buildings**
    - **Loading and unloading/tipping areas**
    - **Storage areas, containers and bays**
    - **Fixed plant location such as trommels, conveyors, shredders**
    - **Mobile plant location**
    - **Location of dust and litter suppression equipment such as bowsers (including the coverage area), nets, wheel washes etc**
    - **Site surfacing**
    - **Dust monitoring locations**

    Reason: *The EMP does not provide a description of the layout of the site or include a site layout plan to show how the site has been designed to* ***minimise litter and dust emissions from site****.*

77. **Identify and describe the control and mitigation measures for each individual fugitive emission source taking into account the level of risk associated with the source.**

    You must demonstrate how appropriate measures are in place for the waste operation and for the installation demonstrate how each of your proposals represent BAT through utilisation of our online guidance, Indicative BAT in Section 2.2.4 of SGN 5.06 – control of fugitive emissions to air and BAT 8, BAT 14, BAT 25 and BAT 31 in the BAT conclusions for waste treatment document (2010/75/EU) 2018.

    You must as a minimum provide:

    - **A clear and detailed description of each mitigation measure proposed and how it will be effectively implemented. Please note, where there is progressive installation of**

measures (such as nets) you must be able to demonstrate that they will be in place before high risk operations commence in that area.

- **Demonstration of the availability of any raw materials and the volumes needed to carry out those mitigation measures such as water for the bowsers**
- **How you will control any run-off or emissions arising as a result of the mitigation in place.**
- **Abatement/control of emissions arising in buildings such as dust extraction systems and how you will operate them**

*Reason: For **each source** of fugitive emissions, the EMP must specifically identify how the sources will be managed and controlled to prevent emissions off site. Whilst Section 5.2 and table 3 provide an assessment of risk and control measures for some sources, it is not a detailed breakdown and contains some generic statements for control, for example 'drop heights will be controlled' but there is no mention of what the drop height should be; 'all main activities will be undertaken within the confines of the installation and **whenever possible** inside the existing and proposed new building', but it must clearly state which activities **will be** carried out within the building. Also there is reference to a good house-keeping regime, but what does the housekeeping entail? Other statements refer to routine spraying of stockpiles depending on weather conditions, but there is no description of exactly which weather conditions would trigger the action and there is no demonstration of water supply availability. The assessment must clearly identify all sources and set out in specific detail the appropriate measures and triggers to control those emissions so that any operatives using the plan are clear about what actions to perform and when.*

78. **Where your assessment has identified that an abatement system is needed to control dust emissions at the facility you must provide the following detail in the EMP for each abatement system:**

    - **Emission input content and concentrations**
    - **Treatment mechanism – description and design**
    - **Process parameters for optimum treatment**
    - **Process monitoring**
    - **Maintenance of abatement and containment system**

    Reason: The EMP does not describe how dusts will be contained and abated in accordance with the BAT conclusions, nor does it explain how the abatement system will be designed, maintained and monitored.

79. **Provide a clear monitoring plan to demonstrate how you will monitor all sources to ensure emissions remain under control. This must include:**

    - **Defined triggers to indicate when action must be taken to bring fugitive emissions back under control.**
    - **Identification of monitoring points and justification as to why these are appropriate taking into account high risk receptors.**
    - **Monitoring technique, frequency and time of monitoring accounting for high risk operating periods.**
    - **Monitoring check sheet.**

    Reason: Table 3 of the EMP identifies that a daily visual inspection will be carried out which may need to be increased during high risk operations/during prolonged dry/windy conditions and a site monitoring check sheet is provided in Appendix I. The check sheet does not provide any specific detail about what should be monitored, where monitoring will take place and when, nor does it identify the triggers for taking any specific actions. You must provide a clear and detailed monitoring

plan so that an operative knows exactly how and when to monitor and the actions needed to rectify any emissions arising on site.

80. **Describe the contingency plans you will put in place to bring fugitive emissions back under control in the event day to day measures are failing and emissions exceed triggers defined in the monitoring plan.**

    You must identify and describe a contingency measure for each individual source and define triggers for implementing and stopping the contingency measures once the emission is deemed to be back under control.

    Reason: The EMP does not provide a detailed contingency plan for the individual sources on site. Table 3 and Section 6 provides some very general contingency measures but it would not be possible for an operative to understand what actions they must take for individual sources to bring emissions back under control.

81. **Identify emergency scenario contingency measures that will be implemented on site to manage emissions in the event of an accident/unexpected incidents such as fire, flooding, breakdown and staff absences.**

    Reason: The EMP does not consider how the risk of fugitive emissions might be impacted in the event of emergencies, incidents, change in markets etc. As unexpected events may affect how materials are managed on site, contingency arrangements must be clearly stated and in place.

82. **Confirm what actions will be taken in the event of a complaint/s. You must include the following as a minimum:**

    - **a full description of how you will respond to complaints**
    - **timescales for completing any investigation and any follow up actions**
    - **Reporting of complaints**
    - **Providing feedback to the complainant**
    - **How you will escalate complaints when a number of complaints are received.**
    - **At what point you will cease operations if numerous complaints are received.**

    *Reason: Section 6 of the EMP describes the complaints procedure. In section 6.1.1 it states that a complaint will be **fully** investigated and then goes on to list actions that **may** be taken to investigate the complaint. If investigating a complaint, at least all of the actions must be taken as part of the investigation. The complaints procedure must clearly set out how you will investigate the complaint, follow up any actions, report it, escalate it, and engage with the complainant and how you will deal with numerous complaints such as ceasing operations.*

83. **Explain how you will take proactive steps to engage with the community.**

    Reason: In section 6 of the EMP you have stated how you will respond to complaints but you have only briefly mentioned in section 6.1.3 that 'if required' you will attend resident liaison meetings to explain how the preventative and corrective measures have been addressed. This does not explain how you will take pro-active steps to engage with the community to prevent complaints in the first place.

84. **In addition to annually, confirm that the EMP will be reviewed in the event that control measures fail.**

    Reason: In section 7 of the EMP you state that the EMP will be reviewed annually, however a review must also be undertaken if it is clear that emission control measures are not working.

85. **Confirm who is responsible for ensuring the EMP is followed and complied with.**

    Reason: Table 3 identifies that tipping activities are supervised by an Attero competent person but you have not identified who the key responsible people are on site for ensuring the plan is followed and complied with.

General

86. **Explain how the railroad will be used as part of the proposed site expansion. You must confirm what waste types will be transported via these means and how the site will accept/ reject and unload material delivered via this method.**

    Reason: Section 4.8.3.2 of the Technical Requirements (and other documents submitted with the application), state that only materials excavated from the former Bolland Skip Hire permit boundary will be transported by rail, however, the Doncaster Metropolitan Borough Council Planning Committee report dated 19th October 2018, in section 2.10 refers to the rail loading area potentially being used to transport waste from site in larger quantities and reducing the number of HGV's in the future. It is not clear if the intention is to remove only existing excavated wastes via the rail loading area or to remove waste outputs generated from the installation.

87. **Confirm the following about the electrical generators referred to in section 9.2.1 and 9.4.2 of the EPTR document:**

    - **The number of generators**
    - **Whether the generators are fixed or mobile**
    - **The net rated thermal input of each generator**
    - **When the generators were first put into operation**
    - **That the electricity generated is used only on site.**

    Reason: In order to understand if the generators fall within the scope of the Specified Generators regulations as referred to in Schedule 25B of the Environmental Permitting Regulations (2018).

88. **Confirm which of the sites processes produce 'compost like outputs'.**

    Reason: Section 4.8.2.10 of the Technical Requirements document refers to compost like outputs (CLO) being stored in area 2 and these are also shown on the site layout plan ECL.041.01.01-02. There is no explanation as to where the CLO arises from and justification that this is the correct description of the waste. Compost like outputs are generally produced following mechanical sorting and separation of waste into biodegradable and non-biodegradable fractions followed by a biological treatment process to further treat the organic fractions in waste. As the facility does not carry out biological treatment it is not clear how any of the waste outputs can be classified as CLO.

89. **Provide a programme of works to demonstrate how you will manage operations and construction to bring the site up to BAT standards and ensure you do not cause pollution.**

    You must include the following:

    - **Identify the improvements necessary to meet BAT at the installation**
    - **Demonstrate how you will bring your containment and surface drainage infrastructure up to standards in line with BAT.**
    - **How and when you intend to implement the necessary improvements**
    - **How you intend to manage day to day site operations during construction so that you do not cause pollution.**

- **How you intend to carry out the construction works so that you do not cause pollution i.e. how you will manage infrastructure changes so that they do not lead to pollution from your permitted activities.**

Reason: *You are currently operating as a waste facility which involves the processing and storage of large volumes of waste outside. You are proposing to expand your operations and the area and layout of your site. To do this, construction and improvement works will be carried out which are likely to disrupt the day to day operations of your waste facility. So that you can operate an installation facility, BAT will require that you also make a number of significant changes to bring your site infrastructure and operations up to a standard that you have not currently accounted for. It is important that the construction works are managed effectively so that pollution does not occur whilst you operate and whilst the necessary improvements are being made on site.*