

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

WTI/EFW HOLDINGS LIMITED

Wheelabrator Kemsley North Energy from Waste Facility
Kemsley Paper Mill
Kemsley
Sittingbourne
Kent
ME10 2TD

Permit number

EPR/SP3206ST

Wheelabrator Kemsley North Energy from Waste Facility

Permit number EPR/SP3206ST

Introductory note

This introductory note does not form a part of the permit

This permit controls the operation of a waste incineration plant. The relevant listed activity is:

Section 5.1 Part A(1)(b) – incineration of non-hazardous waste in a waste incineration plant or waste co-incineration plant with a capacity of 3 tonnes or more per hour.

The permit implements the requirements of the EU Directives on Industrial Emissions and Waste.

The main features of the permit are as follows:

The facility will be located at national grid reference TQ 92160 66730, on land immediately north of the permitted Kemsley Generating Station (GS) (permit number EPR/JP3135DK). To the west of the site is the Kemsley Paper Mill (permit number EPR/BJ74681C).

The facility will comprise a single line capable of processing up to 390,000 tonnes of non-hazardous waste per annum. All waste will be delivered by road to the waste bunker following waste acceptance procedures. The waste bunker has a capacity equating to approximately 8,000 tonnes of waste material.

The materials to be burned will comprise treated non-hazardous waste materials namely: Municipal solid waste (MSW), commercial and industrial waste (C & I) which includes solid residues from the paper mill and solid recovered fuel (SRF). Waste material is transferred from the bunker via an overhead gantry crane into the waste charging hopper. The charging hopper connects into a feed chute from where a hydraulically driven ram feeder is used to evenly distribute the charge along its extent and transport it to the grate area. Moving grate technology will be used for burning waste material.

The combustion stage will be automatically controlled to ensure optimum destruction of pollutants and minimum waste generation. Primary combustion air will be fed into the furnace through the underside of the grates and secondary air will be injected at high velocity through nozzles positioned in the walls of the combustion chamber above the level of the waste.

Back-up burners using fuel-oil will be located above the grate. The burners will be automatically triggered to ensure that the minimum temperature of 850°C is maintained.

Energy is recovered from the hot flue gases within the steam boiler. Hot gases from the furnace will pass into the boiler section where steam will be raised. Steam raised in the 135 MWth boiler will usually be passed to a single steam turbine to generate electricity which will be used on-site (up to 5 MWe) and exported to the National Grid (up to 37 MWe) with a generating capacity of up to 42 MWe. Occasionally, some steam (at intermediate pressure) will be exported via the steam supply system to Kemsley GS and then to the Paper Mill. This will happen when Kemsley GS cannot provide the required steam demand.

Abatement and controls are in place to ensure that releases to air are controlled below the limits specified within the IED and the incineration Best Available Techniques (BAT) conclusions. These are selective non-catalytic reduction (SNCR), dry sorption reactor with hydrated lime and activated carbon injection, fabric bag filter and boiler design. Flue gases exiting the abatement system will be discharged through a 90 m stack.

The facility has been designed to minimise fresh water consumption by maximising the re-use of process waters and through the collection of rainwaters.

The main solid residues will be bottom ash and air pollution control (APC) residues. Both will be transferred off-site by a third party for treatment or disposal in accordance with duty of care requirements.

An environmental management system will be established and certified in accordance with the requirements of the ISO14001 standard.

The facility is within the screening distance of a number of statutory and non-statutory ecological sites which include:

The Swale Special Protection Area (SPA), Ramsar and Site of Special Scientific Interest (SSSI), Medway estuary and marshes SPA and Ramsar, Thames estuary and marshes SPA and Ramsar, Outer Thames estuary SPA, Queendown Warren Special Area of Conservation (SAC) and two local wildlife sites.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application EPR/SP3206ST/A001	08/10/2020	Duly made Application for an incinerator processing up to 390,000 tonnes of non-hazardous waste per annum.
Additional information received	13/10/2020	Waste throughput and basis of impact assessments.
Request for further information (Schedule 5 Notice) dated 21/10/2020	05/11/2020	Air quality (human health & habitats), abnormal operation, SNCR vs SCR and energy efficiency.
Request for further information by email sent 26/10/2020	05/11/2020	Noise
Request for further information by email sent 10/11/2020	25/11/2020	Schedule 5 Notice response clarification and storage arrangements.
	27/11/2020	Energy Efficiency Directive
Request for further information (Schedule 5 Notice) dated 09/12/2020	17/12/2020	Impact on The Swale SPA, Ramsar and SSSI.
Additional information received	13/01/2021	Mercury monitoring frequency
Updated permit application report, version 5 dated 28/01/2021	28/01/2021	Replaces previous submission dated 30 July 2020
Permit EPR/SP3206ST/A001 determined	23/02/2021	Permit issued to WTI/EFW HOLDINGS LIMITED

Other Part A installation permits relating to this installation		
Operator	Permit number	Date of issue
K3 CHP Operations Limited (Kemsley GS)	EPR/JP3135DK	05/08/2016
DS Smith Paper Limited (Kemsley Paper Mill)	EPR/BJ7468IC	22/03/2002

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/SP3206ST

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

WTI/EFW HOLDINGS LIMITED (“the operator”),

whose registered office is

**Cannon Place
78 Cannon Street
London
EC4N 6AF**

company registration number **07593865**

to operate an installation at

**Wheelabrator Kemsley North Energy from Waste Facility
Kemsley Paper Mill
Kemsley
Sittingbourne
Kent
ME10 2TD**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Anne Lloyd	23/02/2021

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is recovered with a high level of energy efficiency and energy is used efficiently in the activities.
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.
- 1.2.2 The operator shall provide and maintain steam and/or hot water pass-outs such that opportunities for the further use of waste heat may be capitalised upon should they become practicable.
- 1.2.3 The operator shall review the viability of Combined Heat and Power (CHP) implementation at least every 4 years, or in response to any of the following factors, whichever comes sooner:
- (a) new plans for significant developments within 15 km of the installation;
 - (b) changes to the Local Plan;
 - (c) changes to the UK CHP Development Map or similar; and
 - (d) new financial or fiscal incentives for CHP.

The results shall be reported to the Environment Agency within 2 months of each review, including where there has been no change to the original assessment in respect of the above factors.

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities;
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.
- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

1.5 Climate change

- 1.5.1 The operator shall review and if appropriate update, at least every 4 years, the climate change adaptation risk assessment submitted with the permit application, and shall update the written management system as appropriate.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.2;
 - (b) it conforms to the description in the documentation supplied by the producer or holder; and
 - (c) it having been separately collected for recycling, it is subsequently unsuitable for recovery by recycling.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.6 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.
- 2.3.7 Waste shall not be charged, or shall cease to be charged, if:
- (a) the combustion chamber temperature is below, or falls below 850°C; or
 - (b) any continuous emission limit value in schedule 3 table S3.1(a) is exceeded; or
 - (c) any continuous emission limit value in schedule 3 table S3.1 is exceeded, other than during abnormal operation or periods of OTNOC; or
 - (d) any continuous emission limit value in schedule 3 table S3.1(b) is exceeded other than during abnormal operation; or
 - (e) monitoring results required to demonstrate compliance with any continuous emission limit value in schedule 3 table S3.1 are unavailable other than during abnormal operation; or
 - (f) there is a stoppage, disturbance or failure of the activated carbon abatement system other than during abnormal operation.
- 2.3.8 The operator shall have at least one auxiliary burner in each line which shall be operated at start-up, shut-down and as required during operation to ensure that the operating temperature specified in condition 2.3.7 is maintained as long as incompletely burned waste is present in the combustion chamber. Unless the temperature specified in condition 2.3.7 is maintained in the combustion chamber, such burner(s) shall be fed only with fuels which result in emissions no higher than those arising from the use of gas-oil, liquefied gas or natural gas.
- 2.3.9 The operator shall record the beginning and end of each period of “abnormal operation”.
- 2.3.10 During a period of “abnormal operation” or OTNOC, the operator shall restore normal operation of the failed equipment or replace the failed equipment as rapidly as possible.
- 2.3.11 Where, during “abnormal operation”, on an incineration line, any of the following situations arise, waste shall cease to be charged on that line until normal operation can be restored:
- (a) continuous measurement shows that an emission exceeds any emission limit value in schedule 3 table S3.1 due to stoppages, disturbances or failures of the abatement plant, or continuous emission monitor(s) are out of service, as the case may be, for a total of 4 hours uninterrupted duration;
 - (b) there is a technically unavoidable stoppage, disturbance or failure of the activated carbon abatement system for a total of 4 hours uninterrupted duration;
 - (c) the cumulative duration of “abnormal operation” periods over 1 calendar year has reached 60 hours;

- (d) continuous measurement shows that an emission exceeds any emission limit value in schedule 3 table S3.1(a).
- (e) continuous emission monitors or alternative techniques to demonstrate compliance with the emission limit value(s) for particulates, TOC and / or CO in schedule 3 table S3.1(a), as detailed in the application or as agreed in writing with the Environment Agency, are unavailable.

2.3.12 The operator shall interpret the end of the period of “abnormal operation” as the earliest of the following:

- (a) when the failed equipment is repaired and brought back into normal operation;
- (b) when the operator initiates a shut-down of the waste combustion activity, as described in the application or as agreed in writing with the Environment Agency;
- (c) when a period of four hours has elapsed from the start of the “abnormal operation”; and
- (d) when, in any calendar year, an aggregated period of 60 hours “abnormal operation” has been reached on an incineration line.

2.3.13 Bottom ash and APC residues shall not be mixed.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

2.5 Pre-operational conditions

2.5.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.4 have been completed.

Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.

3.1.2 The limits given in schedule 3, subject to condition 3.2.1, shall not be exceeded.

3.1.3 Wastes produced at the site shall, as a minimum, be sampled and analysed in accordance with schedule 3 table S3.4. Additional samples shall be taken and tested and appropriate action taken, whenever:

- (a) disposal or recovery routes change; or
- (b) it is suspected that the nature or composition of the waste has changed such that the route currently selected may no longer be appropriate.

3.2 Emissions limits and monitoring for emission to air for incineration plant

3.2.1 The limits for emissions to air apply as follows:

- (a) The limits in table S3.1 shall not be exceeded except during periods of abnormal operation or OTNOC.
- (b) The limits in table S3.1(a) shall not be exceeded.
- (c) The limits in table S3.1(b) shall not be exceeded except during abnormal operation.

3.2.2 Where Continuous Emission Monitors are installed to comply with the monitoring requirements in schedule 3 table S3.1, S3.1(a) and S3.1(b); the Continuous Emission Monitors shall be used such that;

- (a) the values of the 95% confidence intervals of a single measured result at the daily emission limit value shall not exceed the following percentages of the emission limit values:
 - Carbon monoxide 10%
 - Sulphur dioxide 20%
 - Oxides of nitrogen (NO & NO₂ expressed as NO₂) 20%
 - Particulate matter 30%
 - Total organic carbon (TOC) 30%
 - Hydrogen chloride 40%
 - Ammonia 40%
- (b) valid half-hourly average values or 10-minute averages shall be determined within the effective operating time (excluding the start-up and shut-down periods) from the measured values after having subtracted the value of the confidence intervals in condition 3.2.2 (a).
- (c) where it is necessary to calibrate or maintain the monitor and this means that data are not available for a complete half-hour or 10 minute period, the half-hourly average or 10-minute average shall in any case be considered valid if measurements are available for a minimum of 20 minutes or 7 minutes during the half-hour or 10-minute period respectively. The number of half-hourly or 10-minute averages so validated shall not exceed 5 or 15 respectively per day;
- (d) daily average values shall be calculated as follows:
 - (i) for the daily average values in table S3.1, the average of valid half hourly averages or 10 minute averages over a calendar day excluding half hourly averages or 10 minute averages during periods of abnormal operation and OTNOC. The daily average value shall be considered valid if no more than five half-hourly average or fifteen 10-minute average values in any day have been determined not to be valid;
 - (ii) for the daily average values in table S3.1(b), the average of valid half hourly averages or 10 minute averages over a calendar day excluding half hourly averages or 10 minute averages during periods of abnormal operation. The daily average value shall be considered valid if no more than five half-hourly average or fifteen 10-minute average values in any day have been determined not to be valid;
- (e) no more than ten daily average values per year shall be determined not to be valid.

3.3 Emissions of substances not controlled by emission limits

- 3.3.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.3.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.
- 3.3.4 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.4 Odour

- 3.4.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Noise and vibration

- 3.5.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.5.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.6 Monitoring

- 3.6.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1, S3.1(a), S3.1(b) and S3.2;
 - (b) process monitoring specified in table S3.3; and
 - (c) residue quality in table S3.4.
- 3.6.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.6.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.6.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate) unless otherwise agreed in writing by the Environment Agency. Newly installed continuous emissions monitors (CEMs), or CEMs replacing existing CEMs, shall have MCERTS certification and have an MCERTS certified range which is not greater than 1.5 times the daily emission limit value (ELV) specified in schedule 3 table S3.1. The CEM shall also be able to measure instantaneous values over the ranges which are to be expected during all operating conditions. If it is necessary to use more than one range setting of the CEM to achieve this requirement, the CEM shall be verified for monitoring supplementary, higher ranges.
- 3.6.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.1(a) and S3.1(b), unless otherwise agreed in writing by the Environment Agency.

3.7 Pests

- 3.7.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.7.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.8 Fire prevention

- 3.8.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.8.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
 - (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year using the annual report form specified in schedule 4, table S4.4 or otherwise in a format agreed with the Environment Agency. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production /treatment data set out in schedule 4 table S4.2;
- (c) the performance parameters set out in schedule 4 table S4.3; and
- (d) the functioning and monitoring of the incineration plant in a format agreed with the Environment Agency. The report shall, as a minimum requirement (as required by Chapter IV of the Industrial Emissions Directive) give an account of the running of the process and the emissions into air and water compared with the emission standards in the IED.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

4.3 Notifications

- 4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.

- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “immediately”, in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 5.1 Part A(1)(b)	The incineration of non-hazardous waste in a waste incineration plant with a capacity of 3 tonnes per hour or more.	From receipt of waste to emission of exhaust gas and removal of residues from site. Waste types and quantities as specified in table S2.2 of this permit.
Directly Associated Activities			
AR2	Electricity generation	Generation of electrical power using a steam turbine from energy recovered from the flue gases.	-
AR3	Back-up fuel-oil fired electrical generator	For providing emergency electrical power to the plant in the event of supply interruption.	Emergency firing, operating less than 500 hours/year.
AR4	Surface water management	Management of uncontaminated surface water drainage.	From collection of surface water including reuse by the facility through to discharge from the installation.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/SP3206ST/A001	Response to question 3 of application form B3 including technical standards. Response to question 3 (IED Chapter IV compliance) of the duly making questions, revision 2 dated 08 October 2020.	08/10/2020
Response to Schedule 5 Notice dated 22/10/2020	Response to question 3 – Monitoring under abnormal operations/failure of the CEMs (duplicate CEMs).	05/11/2020
Application EPR/SP3206ST/A001	Updated Wheelabrator Kemsley North (WKN) Energy from Waste Facility Permit application document, dated 28 January 2021, version 5: Sections 1.1, 1.5, 2.1 to 2.5, 3.1, 3.2, 3.4, 3.5, 3.8 to 3.11, 4.1 to 4.5, 4.7 and Waste Incineration BAT Conclusions 2019.	28/01/2021

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The Operator shall submit a written report to the Environment Agency on the implementation of its Environmental Management System (EMS) and the progress made in the certification of the system by an external body or if appropriate submit a schedule by which the EMS will be certified.	Within 12 months of the completion of commissioning
IC2	The Operator shall submit a written proposal to the Environment Agency to carry out tests to determine the size distribution of the particulate matter in the exhaust gas emissions to air from emission point A1, identifying the fractions within the PM ₁₀ , and PM _{2.5} ranges. On receipt of written approval from the Environment Agency to the proposal and the timetable, the Operator shall carry out the tests and submit to the Environment Agency a report on the results.	Within 6 months of the completion of commissioning
IC3	The Operator shall submit a written report to the Environment Agency on the commissioning of the installation. The report shall summarise the environmental performance of the plant as installed against the design parameters set out in the Application. The report shall also include a review of the performance of the facility against the conditions of this permit and details of procedures developed during commissioning for achieving and demonstrating compliance with permit conditions and confirm that the EMS has been updated accordingly.	Within 4 months of the completion of commissioning
IC4	The Operator shall notify the Environment Agency of the proposed date(s) that validation testing is planned for.	Notification at least 3 weeks prior to validation testing
	During commissioning the Operator shall carry out validation testing to validate the residence time, minimum temperature and oxygen content of the gases in the furnace whilst operating under normal load and most unfavourable operating conditions. The validation shall be to the methodology as approved through pre-operational condition PO8 in this permit.	Validation tests completed before the end of commissioning
	The Operator shall submit a written report to the Environment Agency on the validation of residence time, oxygen and temperature whilst operating under normal load, minimum turn down and overload conditions. The report shall identify the process controls used to ensure residence time and temperature requirements are complied with during operation of the incineration plant.	Report submitted within 2 months of the completion of commissioning
IC5	The Operator shall submit a written report to the Environment Agency describing the performance and optimisation of: <ul style="list-style-type: none"> • The Selective Non Catalytic Reduction (SNCR) system and combustion settings to minimise oxides of nitrogen (NO_x).The report shall include an assessment of the level of NO_x, N₂O and NH₃ emissions that can be achieved under optimum operating conditions. • The lime injection system for minimisation of acid gas emissions. • The carbon injection system for minimisation of dioxin and heavy metal emissions. 	Within 4 months of the completion of commissioning

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC6	<p>The Operator shall carry out an assessment of the impact of emissions to air of the following component metals subject to emission limit values: Cd, As, Pb, Cr (VI), Co, Mn and Ni.</p> <p>A report on the assessment shall be made to the Environment Agency.</p> <p>Emissions monitoring data obtained during the first year of operation shall be used to compare the actual emissions with those assumed in the impact assessment submitted with the Application. An assessment shall be made of the impact of each metal against the relevant environmental standard (ES). In the event that the assessment shows that an ES can be exceeded, the report shall include proposals for further investigative work.</p>	15 months from the completion of commissioning
IC7	<p>The Operator shall submit a written summary report to the Environment Agency to confirm that the performance of Continuous Emission Monitors for parameters as specified in tables S3.1 and S3.1(a) complies with the requirements of BS EN 14181, specifically the requirements of QAL1, QAL2 and QAL3. The report shall include the results of calibration and verification testing.</p>	<p>Initial calibration report to be submitted to the Agency within 3 months of completion of commissioning</p> <p>Full summary evidence compliance report to be submitted within 18 months of completion of commissioning</p>
IC8	<p>During commissioning, the Operator shall carry out tests to demonstrate whether the furnace combustion air will ensure that negative pressure is achieved throughout the reception hall. The tests shall demonstrate whether air is pulled through the reception hall and bunker area and into the furnace with dead spots minimised.</p> <p>The Operator shall also carry out tests of methods used to maintain negative pressure during shut-down periods to ensure that adequate extraction will be achieved.</p> <p>The Operator shall submit a report to the Environment Agency, for approval, summarising the findings along with any proposed improvements if required.</p>	Within 3 months of completion of commissioning
IC9	<p>The Operator shall carry out a programme of dioxin and dioxin like PCB monitoring over a period and frequency agreed with the Environment Agency.</p> <p>The Operator shall submit a report to the Environment Agency with an analysis of whether dioxin emissions can be considered to be stable.</p>	Within 3 months of completion of commissioning or as agreed in writing with the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC10	<p>The Operator shall carry out a programme of mercury monitoring over a period and frequency agreed with the Environment Agency.</p> <p>The Operator shall submit a report to the Environment Agency with an analysis of whether the waste feed to the plant can be proven to have a low and stable mercury content.</p>	<p>Within 3 months of completion of commissioning or as agreed in writing with the Environment Agency</p>
IC11	<p>The Operator shall submit a report to the Environment Agency for approval on start-up and shut-down conditions over the first 12 months of operation.</p> <p>The report shall identify any amendments to the start-up and shut-down definitions that were described in the application.</p>	<p>Within 15 months of completion of commissioning or as agreed in writing with the Environment Agency</p>

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO1	<p>Prior to the commencement of commissioning, the Operator shall send the following to the Environment Agency and obtain the Environment Agency's written approval to the EMS summary and the full OTNOC management plan:</p> <p>A summary of the site EMS.</p> <p>A copy of the full OTNOC management plan which shall be prepared in accordance with BAT 18 of the incineration BAT conclusions.</p> <p>The Operator shall make available for inspection all documents and procedures which form part of the EMS. The EMS shall be developed in line with the requirements set out in Environment Agency web guide on developing a management system for environmental permits (found on www.gov.uk) and BAT 1 of the incineration BAT conclusions. The EMS shall include the approved OTNOC management plan.</p> <p>The documents and procedures set out in the EMS shall form the written management system referenced in condition 1.1.1 (a) of the permit.</p>
PO2	<p>Prior to the commencement of commissioning, the Operator shall send a report to the Environment Agency, and obtain the Environment Agency's written approval to it, which will contain a comprehensive review of the options available for utilising the heat generated, including operating as CHP or supplying district heating, by the waste incineration process in order to ensure that it is recovered as far as practicable. The review shall detail any identified proposals for improving the recovery and utilisation of heat and shall provide a timetable for their implementation.</p>
PO3	<p>Prior to the commencement of commissioning, the Operator shall submit to the Environment Agency, and obtain the Environment Agency's written approval to it, a protocol for the sampling and testing of incinerator bottom ash for the purposes of assessing its hazard status. Sampling and testing shall be carried out in accordance with the protocol as approved.</p>

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO4	<p>Prior to the commencement of commissioning, the Operator shall submit to the Environment Agency, and obtain the Environment Agency's written approval to it, a written commissioning plan, including timelines for completion, for approval by the Environment Agency. The commissioning plan shall include the expected emissions to the environment during the different stages of commissioning, the expected durations of commissioning activities and the actions to be taken to protect the environment and report to the Environment Agency in the event that actual emissions exceed expected emissions. Commissioning shall be carried out in accordance with the commissioning plan as approved.</p>
PO5	<p>Prior to the commencement of commissioning, the Operator shall submit a written report to the Environment Agency, and obtain the Environment Agency's written approval to it, detailing the waste acceptance procedure to be used at the site. The waste acceptance procedure shall include the process and systems by which wastes unsuitable for incineration at the site will be controlled.</p> <p>The procedure shall be implemented in accordance with the written approval from the Environment Agency.</p>
PO6	<p>No later than one month after the final design of the furnace and combustion chamber, the Operator shall submit a written report to the Environment Agency, and obtain the Environment Agency's written approval to it, of the details of the computational fluid dynamic (CFD) modelling. The report shall explain how the furnace has been designed to comply with the residence time and temperature requirements as defined by Chapter IV and Annex VI of the IED whilst operating under normal load and the most unfavourable operating conditions (including minimum turn down and overload conditions), and that the design includes sufficient monitoring ports to support subsequent validation of these requirements during commissioning.</p>
PO7	<p>At least nine months before (or other date agreed in writing with the Environment Agency) the commencement of commissioning, the Operator shall submit a written report to the Environment Agency, and obtain the Environment Agency's written approval to it, specifying arrangements for continuous and periodic monitoring of emissions to air to comply with Environment Agency guidance notes on .gov.uk:</p> <ul style="list-style-type: none"> • Sampling requirements for stack emission monitoring. • Monitoring stack emissions. • Quality assurance of continuous emissions monitoring systems. <p>The report shall include the following:</p> <ul style="list-style-type: none"> • Plant and equipment details, including accreditation to MCERTS. • Methods and standards for sampling and analysis. • Details of monitoring locations, access and working platforms.

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO8	At least three months before the commencement of commissioning (or other date agreed in writing with the Environment Agency) the Operator shall submit, for approval by the Environment Agency, a methodology (having regard to Technical Report P4-100/TR Part 2 Validation of Combustion Conditions) to verify the residence time, minimum temperature and oxygen content of the gases in the furnace whilst operating under normal load, minimum turn down and overload conditions.
PO9	At least three months before (or other date agreed in writing with the Environment Agency) the commencement of commissioning, the Operator shall submit detailed drainage plans to the Environment Agency, and obtain the Environment Agency's written approval to them.
PO10	At least three months before the commencement of commissioning (or other date agreed in writing with the Environment Agency), the Operator shall submit an updated Fire Prevention Plan to the Environment Agency, and obtain the Environment Agency's written approval to it. The plan shall be written in accordance with the Environment Agency guidance notes on .gov.uk (Fire prevention plans: environmental permits) and our document 'Assessment of a Fire Prevention Plan' sent electronically 5 November 2020. The plan shall be implemented in accordance with the written approval from the Environment Agency.
PO11	<p>At least three months before the commencement of commissioning (or other date agreed in writing with the Environment Agency), the Operator shall submit a Noise Management Plan to the Environment Agency, and obtain the Environment Agency's written approval to it. The plan shall be written in accordance with the Environment Agency guidance notes on .gov.uk (Noise and vibration management plan). The plan shall also include the following:</p> <ul style="list-style-type: none"> • Mitigation of beat frequencies between the air-cooled condensers by employing controllable frequency fan motors. • Acoustically attenuated louvres. • Operation of the roller shutter doors. <p>The plan shall be implemented in accordance with the written approval from the Environment Agency.</p>
PO12	At least three months before (or other date agreed in writing with the Environment Agency) the commencement of commissioning, the Operator shall confirm the choice of reagent to be used for the SNCR system.

Schedule 2 – Waste types, raw materials and fuels

Raw materials and fuel description	Specification
Fuel-oil	< 0.1% sulphur content

Maximum quantity	Maximum capacity of plant 390,000 tonnes/year Maximum storage 8,000 tonnes
Waste code	Description
02	Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing
02 01	wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing
02 01 03	plant-tissue waste
02 01 04	waste plastics (except packaging)
02 01 07	wastes from forestry
02 03	wastes from fruit, vegetables, cereals, edible oils, cocoa, coffee, tea and tobacco preparation and processing; conserve production; yeast and yeast extract production, molasses preparation and fermentation
02 03 01	sludges from washing, cleaning, peeling, centrifuging and separation
02 03 02	wastes from preserving agents
02 03 03	wastes from solvent extraction
02 03 04	materials unsuitable for consumption or processing
02 03 05	sludges from on-site effluent treatment
02 05	wastes from the dairy products industry
02 05 01	materials unsuitable for consumption or processing
02 05 02	sludges from on-site effluent treatment
02 06	wastes from the baking and confectionery industry
02 06 01	materials unsuitable for consumption or processing
02 06 02	wastes from preserving agents
02 06 03	sludges from on-site effluent treatment
02 07	wastes from the production of alcoholic and non-alcoholic beverages (except coffee, tea and cocoa)
02 07 01	wastes from washing, cleaning and mechanical reduction of raw materials
02 07 02	wastes from spirits distillation
02 07 03	wastes from chemical treatment
02 07 04	materials unsuitable for consumption or processing
02 07 05	sludges from on-site effluent treatment
03	Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard

03 01	wastes from wood processing and the production of panels and furniture
03 01 01	waste bark and cork
03 01 05	sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04
03 03	wastes from pulp, paper and cardboard production and processing
03 03 01	waste bark and wood
03 03 02	green liquor sludge (from recovery of cooking liquor)
03 03 05	de-inking sludges from paper recycling
03 03 07	mechanically separated rejects from pulping of waste paper and cardboard
03 03 08	wastes from sorting of paper and cardboard destined for recycling
03 03 10	fibre rejects, fibre-, filler- and coating-sludges from mechanical separation
03 03 11	sludges from on-site effluent treatment other than those mentioned in 03 03 10
04	Wastes from the textile industry
04 02	wastes from the textile industry
04 02 15	wastes from finishing other than those mentioned in 04 02 14
04 02 21	wastes from unprocessed textile fibres
04 02 22	wastes from processed textile fibres
15	Waste packaging, absorbents, wiping cloths, filter materials and protective clothing not otherwise specified
15 01	packaging (including separately collected municipal packaging waste)
15 01 01	paper and cardboard packaging
15 01 02	plastic packaging
15 01 03	wooden packaging
15 01 06	mixed packaging
15 01 09	textile packaging
15 02	absorbents, filter materials, wiping cloths and protective clothing
15 02 03	absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 15 02 02
16	Wastes not otherwise specified in the list
16 01	end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)
16 01 03	end-of-life tyres
16 01 19	plastic
17	Construction and demolition wastes (including excavated soil from contaminated sites)
17 02	wood, glass and plastic
17 02 01	wood
17 02 03	plastic
17 09	other construction and demolition wastes
17 09 04	mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03

19	Wastes from waste management facilities, off-site waste water treatment plants and the preparation of water intended for human consumption and water for industrial use
19 02	wastes from physico/chemical treatments of waste
19 02 03	premixed wastes composed only of non-hazardous wastes
19 02 10	combustible wastes other than those mentioned in 19 02 08 and 19 02 09
19 05	wastes from aerobic treatment of solid wastes
19 05 01	non-composted fraction of municipal and similar wastes
19 05 02	non-composted fraction of animal and vegetable waste
19 05 03	off-specification compost
19 06	wastes from anaerobic treatment of waste
19 06 04	digestate from anaerobic treatment of municipal waste
19 06 06	digestate from anaerobic treatment of animal and vegetable waste
19 12	wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 01	paper and cardboard
19 12 04	plastic and rubber
19 12 07	wood other than that mentioned in 19 12 06
19 12 08	textiles
19 12 10	combustible waste (refuse derived fuel)
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
20	Municipal wastes (household waste and similar commercial, industrial and institutional wastes) including separately collected fractions
20 01	separately collected fractions (except 15 01)
20 01 01	paper and cardboard
20 01 08	biodegradable kitchen and canteen waste
20 01 10	clothes
20 01 11	textiles
20 01 25	edible oil and fat
20 01 28	paint, inks, adhesives and resins other than those mentioned in 20 01 27
20 01 38	wood other than that mentioned in 20 01 37
20 01 39	plastics
20 02	garden and park wastes (including cemetery waste)
20 02 01	biodegradable waste
20 03	other municipal wastes
20 03 01	mixed municipal waste
20 03 02	waste from markets
20 03 03	street-cleaning residues
20 03 04	septic tank sludge
20 03 06	waste from sewage cleaning
20 03 07	bulky waste

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1	Particulate matter	Incinerator stack	30 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Particulate matter	Incinerator stack	5 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Total organic carbon (TOC)	Incinerator stack	20 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Total organic carbon (TOC)	Incinerator stack	10 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Hydrogen chloride	Incinerator stack	60 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Hydrogen chloride	Incinerator stack	6 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Carbon monoxide	Incinerator stack	150 mg/m ³	95% of all 10-minute averages in any 24-hour period	Continuous measurement	BS EN 14181
A1	Carbon monoxide	Incinerator stack	50 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Sulphur dioxide	Incinerator stack	200 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Sulphur dioxide	Incinerator stack	30 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	Incinerator stack	400 mg/m ³	½-hr average	Continuous measurement	BS EN 14181

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	Incinerator stack	120 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Ammonia (NH ₃)	Incinerator stack	5 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Mercury and its compounds	Incinerator stack	0.02 mg/m ³ Limit does not apply if continuous monitoring has been specified by the Environment Agency after completion of IC10	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year and accelerated monitoring at frequency agreed through IC10 Then bi-annual Not required if continuous monitoring has been specified by the Environment Agency after completion of IC10	BS EN 13211
A1	Mercury and its compounds	Incinerator stack	0.02 mg/m ³	Daily average	Continuous Not required unless continuous monitoring has been specified by the Environment Agency after completion of IC10	BS EN 14181

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1	Cadmium & thallium and their compounds (total)	Incinerator stack	0.02 mg/m ³	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year. Then bi-annual	BS EN 14385
A1	Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V and their compounds (total)	Incinerator stack	0.3 mg/m ³	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year Then bi-annual	BS EN 14385
A1	Hydrogen fluoride	Incinerator stack	1 mg/m ³	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year Then bi-annual	BS ISO 15713 CEN TS 17340 ^{Note 2}
A1	Nitrous oxide (N ₂ O)	Incinerator stack	No limit set	Average of three consecutive measurements of at least 30 minutes each	Annually	BS EN ISO 21258
A1	Dioxins / furans (I-TEQ)	Incinerator stack	0.04 ng/m ³	periodic over minimum 6 hours, maximum 8 hour period	Monthly for first 6 months and accelerated monitoring as agreed through IC9, quarterly for following 6 months and then bi-annually	BS EN 1948 Parts 1, 2 and 3
A1	Dioxins / furans (I-TEQ)	Incinerator stack	0.06 ng/m ³ ^{Note 1}	Value over the sampling period of 2 to 4 weeks for long-term sampling	Long-term monitoring if specified by the Environment Agency after completion of IC9.	Long-term sampling method if specified by the Environment Agency after completion of IC9
A1	Dioxin-like PCBs (WHO-TEQ Humans / Mammals, Fish, Birds)	Incinerator stack	No limit set	periodic over minimum 6 hours,	Monthly for first 6 months and accelerated monitoring as agreed through IC9, quarterly for	BS EN 1948 Parts 1, 2 and 4

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
				maximum 8 hour period	following 6 months and then bi-annually No monitoring is required if emissions have been shown to be below 0.01 ng/m ³ as agreed with the Environment Agency.	
A1	Dioxins / furans (WHO-TEQ Humans / Mammals, Fish, Birds)	Incinerator stack	No limit set	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year Then bi-annual	BS EN 1948 Parts 1, 2 and 3
A1	Specific individual polycyclic aromatic hydrocarbons (PAHs), as specified in Schedule 6.	Incinerator stack	No limit set	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year Then annually	BS ISO 11338 Parts 1 and 2.
A2	No parameters set	IBA exhaust	-	-	-	-
A3	No parameters set	Boiler expansion flaps	-	-	-	-
A4	No parameters set	Discharge vent via activated charcoal filter	-	-	-	-
A5	Carbon monoxide	Back-up fuel-oil fired electrical generator	No limit set	Periodic	Every three years	MCERTs BS EN 15058
Note 1: Limit and monitoring requirements shall only apply where specified by the Environment Agency following completion of IC9 in this permit.						

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
Note 2: This standard shall replace BS ISO 15713 on 1 March 2022.						

Table S3.1(a) Point source emissions to air during abnormal operation of incineration plant – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1	Particulate matter	Incinerator stack	150 mg/m ³	½-hr average	Continuous measurement	BS EN 14181 during abatement plant failure
A1	Total organic carbon (TOC)	Incinerator stack	20 mg/m ³	½-hr average	Continuous measurement	BS EN 14181 during abatement plant failure
A1	Carbon monoxide	Incinerator stack	150 mg/m ³	95% of all 10-minute averages in any 24-hour period	Continuous measurement	BS EN 14181 during abatement plant failure

Table S3.1(b) Point source emissions to air during OTNOC – emission limits (IED Annex VI limits) and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1	As specified in the OTNOC management plan as approved after completion of pre-operational condition PO1	Incinerator stack		As specified in the OTNOC management plan as approved after completion of pre-operational condition PO1		
A1	Particulate matter	Incinerator stack	30 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Particulate matter	Incinerator stack	10 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Total organic carbon (TOC)	Incinerator stack	20 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Total organic carbon (TOC)	Incinerator stack	10 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Hydrogen chloride	Incinerator stack	60 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Hydrogen chloride	Incinerator stack	10 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Carbon monoxide	Incinerator stack	150 mg/m ³	95% of all 10-minute averages in any 24-hour period	Continuous measurement	BS EN 14181
A1	Carbon monoxide	Incinerator stack	50 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Sulphur dioxide	Incinerator stack	200 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Sulphur dioxide	Incinerator stack	50 mg/m ³	daily average	Continuous measurement	BS EN 14181

Table S3.1(b) Point source emissions to air during OTNOC – emission limits (IED Annex VI limits) and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	Incinerator stack	400 mg/m ³	½-hr average	Continuous measurement	BS EN 14181
A1	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)	Incinerator stack	200 mg/m ³	daily average	Continuous measurement	BS EN 14181
A1	Ammonia (NH ₃)	Incinerator stack	5 mg/m ³	½-hr average and / or daily average	Continuous measurement	BS EN 14181
A1	Hydrogen fluoride	Incinerator stack	2 mg/m ³	periodic over minimum 1-hour period	Quarterly in first year Then bi-annual	BS ISO 15713 CEN TS 17340 ^{Note 1}
A1	Cadmium & thallium and their compounds (total)	Incinerator stack	0.05 mg/m ³	periodic over minimum 30 minute, maximum 8 hour period	Quarterly in first year Then bi-annual	BS EN 14385
A1	Mercury and its compounds	Incinerator stack	0.05 mg/m ³	periodic over minimum 30 minute, maximum 8 hour period	Quarterly in first year Then bi-annual	BS EN 13211
A1	Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V and their compounds (total)	Incinerator stack	0.5 mg/m ³	periodic over minimum 30 minute, maximum 8 hour period	Quarterly in first year Then bi-annual	BS EN 14385
A1	Nitrous oxide (N ₂ O)	Incinerator stack	No limit set	periodic over minimum 1-hour period	Quarterly in the first year Then bi-annual	BS EN ISO 21258

Table S3.1(b) Point source emissions to air during OTNOC – emission limits (IED Annex VI limits) and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1	Dioxins / furans (I-TEQ)	Incinerator stack	0.1 ng/m ³	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year Then bi-annual	BS EN 1948 Parts 1, 2 and 3
Note 1: This standard shall replace BS ISO 15713 on 1 March 2022.						

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1	Uncontaminated surface water run-off via oil interceptor and attenuation pond	Oil and grease	None visible	Instantaneous	Note 1	Visual inspection
Note 1: Daily monitoring is required when W1 discharges into The Swale.						

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
As agreed in writing with the Environment Agency	Wind speed and direction	Continuous	Anemometer	-
Location close to the Combustion Chamber inner wall or as identified and justified in Application.	Temperature (° C)	Continuous	Traceable to national standards	As agreed in writing with the Environment Agency
A1	Exhaust gas temperature	Continuous	Traceable to national standards	As agreed in writing with the Environment Agency
A1	Exhaust gas pressure	Continuous	Traceable to national standards	As agreed in writing with the Environment Agency
A1	Exhaust gas flow	Continuous	Traceable to national standards	As agreed in writing with the Environment Agency
A1	Exhaust gas oxygen content	Continuous	BS EN 15267-3 BS EN 14181	-
A1	Exhaust gas water vapour content	Continuous	BS EN 15267-3 BS EN 14181	Unless gas is dried before analysis of emissions.
Incineration plant	Gross electrical efficiency	Within 6 months of first operation and then within 6 months of any modification that significantly affects energy efficiency	Performance test at full load	No lower than 31.1%

Table S3.4 Residue quality					
Emission point reference or source or description of point of measurement	Parameter	Limit	Monitoring frequency	Monitoring standard or method ^{Note 1}	Other specifications
Bottom ash	TOC	<3%	Monthly in the first year of operation Then quarterly	BS EN 14899 and either BS EN 13137 or BS EN 15936	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'
Bottom ash	Metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) and their compounds, dioxins/furans and dioxin-like PCBs	No limits set	Monthly in the first year of operation Then quarterly	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	-
Bottom ash	Total soluble fraction and metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) soluble fractions	No limits set	Before use of a new disposal or recycling route	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	-
APC residues	Metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) and their compounds, dioxins/furans and dioxin-like PCBs	No limits set	Monthly in the first year of operation Then quarterly	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	-
APC residues	Total soluble fraction and metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) soluble fractions	No limits set	Before use of a new disposal or recycling route	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	-
Note 1: Or other equivalent standard as agreed in writing with the Environment Agency.					

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1. Reporting of the daily average parameters in table S3.1(b) is only required if a period of OTNOC has occurred during that day	A1	Quarterly	1 Jan, 1 Apr, 1 Jul and 1 Oct
TOC Parameters as required by condition 3.5.1	Bottom ash	Quarterly (but monthly for the first year of operation)	1 Jan, 1 Apr, 1 Jul and 1 Oct
Metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) and their compounds, dioxins/furans and dioxin-like PCBs Parameters as required by condition 3.5.1	Bottom ash	Quarterly (but monthly for the first year of operation)	1 Jan, 1 Apr, 1 Jul and 1 Oct
Total soluble fraction and metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) soluble fractions Parameters as required by condition 3.5.1	Bottom ash	Before use of a new disposal or recycling route	-
Metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) and their compounds, dioxins/furans and dioxin-like PCBs Parameters as required by condition 3.5.1	APC residues	Quarterly (but monthly for the first year of operation)	1 Jan, 1 Apr, 1 Jul and 1 Oct
Total soluble fraction and metals (antimony, cadmium, thallium, mercury, lead, chromium, copper, manganese, nickel, arsenic, cobalt, vanadium, zinc) soluble fractions Parameters as required by condition 3.5.1	APC residues	Before use of a new disposal or recycling route	-
Functioning and monitoring of the incineration plant as required by condition 4.2.2	-	Annually	1 Jan

Parameter	Units
Total municipal waste incinerated	tonnes
Total commercial waste incinerated	tonnes
Electrical energy produced	KWh
Thermal energy produced e.g. steam for export	KWh
Electrical energy exported	KWh
Electrical energy used on installation	KWh
Waste heat utilised by the installation	KWh

Parameter	Frequency of assessment	Units
Annual Report as required by condition 4.2.2	Annually	-
Electrical energy exported, imported and used at the installation	Annually	KWh / tonne of waste incinerated
Fuel-oil consumption	Annually	Kg / tonne of waste incinerated
Bottom ash residue	Annually	Route, tonnes and tonnes / tonne of waste incinerated
APC residue	Annually	Route, tonnes and tonnes / tonne of waste incinerated
Ammonia / urea consumption	Annually	Kg / tonne of waste incinerated
Activated carbon consumption	Annually	Kg / tonne of waste incinerated
Lime consumption	Annually	Kg / tonne of waste incinerated
Water consumption	Annually	m ³ / tonne of waste incinerated
Periods of abnormal operation	Annually	No of occasions and cumulative hours for current calendar year

Media/parameter	Reporting format	Date of form
Annual report required by condition 4.2.2	Annual performance report template	2021
Air	Forms air 1-9 or other forms as agreed in writing by the Environment Agency	2021
Water	Form water 1 or other form as agreed in writing by the Environment Agency	2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit number	EPR/SP3206ST
Name of operator	WTI/EFW HOLDINGS LIMITED
Location of facility	Kemsley, Sittingbourne, Kent
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“abatement equipment” means that equipment dedicated to the removal of polluting substances from releases from the installation to air or water media.

“abnormal operation” means any technically unavoidable stoppages, disturbances, or failures of the abatement plant or the measurement devices, during which the emissions into the air may exceed the prescribed emission limit values for the pollutant(s) affected.

“accident” means an accident that may result in pollution.

“APC residues” means air pollution control residues.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“BAT conclusions” means Best Available Techniques (BAT) Conclusions published by the European Commission.

“bottom ash” means ash falling through the grate or transported by the grate.

“CEM” Continuous emission monitor.

“CEN” means Comité Européen de Normalisation.

“bi-annual” means twice per year with at least five months between tests;

“commissioning” means testing of the new incineration plant that involves any operation of the furnace or as agreed with the Environment Agency.

“daily average” means average over a period of one day based on valid half-hourly averages.

“dioxin and furans” means polychlorinated dibenzo-p-dioxins and polychlorinated dibenzofurans.

“disposal”. Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“half-hourly average” means average value over a period of 30 minutes.

“incineration line” means all of the incineration equipment related to a common discharge to air location.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“ISO” means International Standards Organisation.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time

“LOI” means loss on ignition a technique used to determine the combustible material by heating the ash residue to a high temperature

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“OTNOC” means operation other than normal operating conditions, excluding start-up and shut-down and periods of abnormal operation, as defined in the OTNOC management plan approved through pre-operational condition PO1 or otherwise as agreed in writing with the Environment Agency.

“PAH” means Poly-cyclic aromatic hydrocarbon, and comprises anthanthrene, benzo[a]anthracene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[b]naph(2,1-d)thiophene, benzo[c]phenanthrene, benzo[ghi]perylene, benzo[a]pyrene, cholanthrene, chrysene, cyclopenta[c,d]pyrene, dibenzo[ah]anthracene, Dibenzo[a,i]pyrene fluoranthene, indo[1,2,3-cd]pyrene, naphthalene.

“PCB” means polychlorinated biphenyl dioxin-like PCBs are the non-ortho and mono-ortho PCBs listed in the table below.

“pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“start-up” is any period, where the plant has been non-operational, after igniting the auxiliary burner until waste has been fed to the plant in sufficient quantity to cover the grate and] to initiate steady-state conditions as described in the application or agreed in writing with the Environment Agency.

“shut-down” is any period where the plant is being returned to a non-operational state and there is no waste being burned as described in the application or agreed in writing with the Environment Agency.

“TOC” means total organic carbon. In respect of releases to air, this means the gaseous and vaporous organic substances, expressed as TOC. In respect of bottom ash, this means the total carbon content of all organic species present in the ash (excluding carbon in elemental form).

“waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“year” means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

(a) in relation to gases from incineration plants other than those burning waste oil, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 11% dry.

For dioxins/furans and dioxin-like PCBs the determination of the toxic equivalence concentration (I-TEQ, & WHO-TEQ for dioxins/furans, WHO-TEQ for dioxin-like PCBs) stated as a release limit and/ or reporting requirement, the mass concentrations of the following congeners have to be multiplied with their respective toxic equivalence factors before summing. When reporting on measurements of dioxins/furans and dioxin-like PCBs, the toxic equivalence concentrations should be reported as a range based on: all congeners less than the detection limit assumed to be zero as a minimum, and all congeners less than the detection limit

assumed to be at the detection limit as a maximum. However the minimum value should be used when assessing compliance with the emission limit value in table S3.1.

TEF schemes for dioxins and furans				
Congener	I-TEF	WHO-TEF		
	1990	2005	1997/8	
		Humans / Mammals	Fish	Birds
Dioxins				
2,3,7,8-TCDD	1	1	1	1
1,2,3,7,8-PeCDD	0.5	1	1	1
1,2,3,4,7,8-HxCDD	0.1	0.1	0.5	0.05
1,2,3,6,7,8-HxCDD	0.1	0.1	0.01	0.01
1,2,3,7,8,9-HxCDD	0.1	0.1	0.01	0.1
1,2,3,4,6,7,8-HpCDD	0.01	0.01	0.001	<0.001
OCDD	0.001	0.0003	-	-
Furans				
2,3,7,8-TCDF	0.1	0.1	0.05	1
1,2,3,7,8-PeCDF	0.05	0.03	0.05	0.1
2,3,4,7,8-PeCDF	0.5	0.3	0.5	1
1,2,3,4,7,8-HxCDF	0.1	0.1	0.1	0.1
1,2,3,7,8,9-HxCDF	0.1	0.1	0.1	0.1
1,2,3,6,7,8-HxCDF	0.1	0.1	0.1	0.1
2,3,4,6,7,8-HxCDF	0.1	0.1	0.1	0.1
1,2,3,4,6,7,8-HpCDF	0.01	0.01	0.01	0.01
1,2,3,4,7,8,9-HpCDF	0.01	0.01	0.01	0.01
OCDF	0.001	0.0003	0.0001	0.0001

TEF schemes for dioxin-like PCBs			
Congener	WHO-TEF		
	2005	1997/8	
	Humans / mammals	Fish	Birds
Non-ortho PCBs			
3,4,4',5-TCB (81)	0.0001	0.0005	0.1
3,3',4,4'-TCB (77)	0.0003	0.0001	0.05
3,3',4,4',5 - PeCB (126)	0.1	0.005	0.1
3,3',4,4',5,5'-HxCB(169)	0.03	0.00005	0.001
Mono-ortho PCBs			

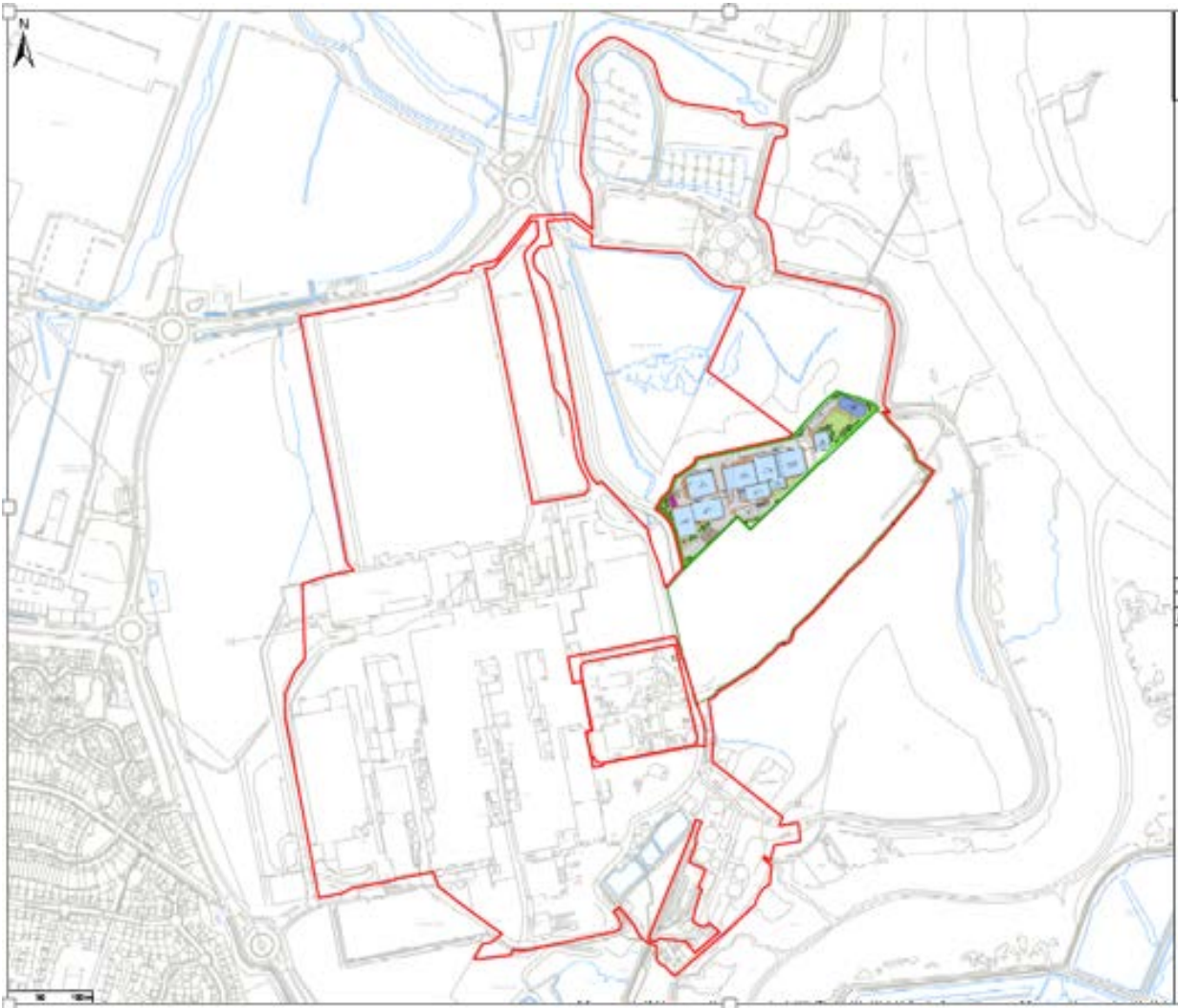
TEF schemes for dioxin-like PCBs			
Congener	WHO-TEF		
	2005	1997/8	
	Humans / mammals	Fish	Birds
2,3,3',4,4'-PeCB (105)	0.00003	<0.000005	0.0001
2,3,4,4',5-PeCB (114)	0.00003	<0.000005	0.0001
2,3',4,4',5-PeCB (118)	0.00003	<0.000005	0.00001
2',3,4,4',5-PeCB (123)	0.00003	<0.000005	0.00001
2,3,3',4,4',5-HxCB (156)	0.00003	<0.000005	0.0001
2,3,3',4,4',5'-HxCB (157)	0.00003	<0.000005	0.0001
2,3',4,4',5,5'-HxCB (167)	0.00003	<0.000005	0.00001
2,3,3',4,4',5,5'-HpCB (189)	0.00003	<0.000005	0.00001

Schedule 7 – Site plan

Site boundary and emission points



General site setting



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END OF PERMIT