

Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2016 (as amended)

Decision document recording our decision-making process following review of a permit

The Permit number is: EPR/HP3398CY
The operator is: MF Bennion Limited
The Installation is: Rose Hill Farm
This Variation Notice number is: EPR/HP3398CY/V007

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication by the European Commission of updated decisions on BAT Conclusions.

We have reviewed the permit for this installation against the revised BAT Conclusions for the Waste Treatment industry sector published on 10 August 2018 in the Official Journal of the European Union. In this decision document, we set out the reasoning for the consolidated variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the operator in the operation and control of the plant and activities of the installation. This review has been undertaken with reference to the decision made by the European Commission establishing Best Available Techniques (BAT) Conclusions (BATc) for Waste Treatment as detailed in document reference C(2018) 5070. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position. It also provides a justification for the inclusion of any specific conditions in the permit that are in addition to those included in our generic permit template.

As well as considering the review of the operating techniques used by the operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and with other permits issued to Installations in this sector. Although the wording of some conditions has changed, while others have been deleted because of the new regulatory approach, it does not reduce the level of environmental

protection achieved by the Permit in any way. In this document, we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future.

How this document is structured

1. Our decision
2. How we reached our decision
3. The legal framework
4. Annex 1 – Review of operating techniques within the Installation against BAT Conclusions.
5. Annex 2 – Review and assessment of changes that are not part of the BAT Conclusions derived permit review
6. Annex 3 – Improvement Conditions

1 Our decision

We have decided to issue the Variation Notice to the operator. This will allow the operator to continue to operate the Installation, subject to the conditions in the Consolidated Variation Notice that updates the whole permit.

We consider that, in reaching our decision, we have taken into account all relevant considerations and legal requirements and that the varied permit will ensure that a high level of protection is provided for the environment and human health.

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of “tailor-made” or installation-specific conditions, or where our Permit template provides two or more options.

2 How we reached our decision

2.1 Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 21/10/2019 requiring the operator to provide information to demonstrate where the operation of their installation currently meets, or how it will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Notice required that where the revised standards are not currently met, the operator should provide information that:

- describes the techniques that will be implemented before 17 August 2022, which will then ensure that operations meet the revised standards, or
- justifies why standards will not be met by 17 August 2022, and confirmation of the date when the operation of those processes will cease within the Installation or an explanation of why the revised BAT standards are not applicable to those processes, or
- justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised BAT standards described in the BAT Conclusions.

Where the operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT-AEL) described in the BAT Conclusions Document, the Regulation 61 Notice required that the operator make a formal request for derogation from compliance with that BAT-AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 61 Notice response from the operator was received on 20/04/2021.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review, but not that it necessarily contained all the information we would need to complete that determination.

The operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 61 Notice response that appears to be confidential in relation to any party.

2.2 Review of our own information in respect to the capability of the Installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous experience in the regulation of the installation we consider that the operator will be able to comply with the techniques and standards described in the BAT Conclusions other than for those techniques and requirements described in BAT Conclusions 1, 2, 3, 4, 8, 10, 12, 13, 14, 19, 21, 22, 23, 24, 33, 34, 35, 36, 37 and 38. In relation to these BAT Conclusions, we do not fully agree with the operator in respect of their current stated capability as recorded in their response to the Regulation 61 Notice. We have therefore included Improvement Conditions 4 and 5 in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusions are delivered before 17 August 2022.

3 The legal framework

The Consolidated Variation Notice will be issued under Regulations 18 and 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Consolidated Variation Notice, it will ensure that the operation of the Installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusions for the Waste Treatment sector, were published by the European Commission on 10 August 2018. There are 53 BAT Conclusions. This annex provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (within 4 years of publication of BAT conclusions)

NC – Not Compliant

BAT Conclusion No	Summary of BAT Conclusion requirement for Waste Treatment	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
1	<p>In order to improve the overall environmental performance, BAT is to implement and adhere to an environmental management system (EMS) that incorporates all of the following features:</p> <ul style="list-style-type: none"> I. commitment of the management, including senior management; II. definition, by the management, of an environmental policy that includes the continuous improvement of the environmental performance of the installation; III. planning and establishing the necessary procedures, objectives and targets, in conjunction with financial planning and investment; IV. implementation of procedures paying particular attention to: <ul style="list-style-type: none"> (a) structure and responsibility, (b) recruitment, training, awareness and competence, (c) communication, (d) employee involvement, (e) documentation, (f) effective process control, (g) maintenance programmes, (h) emergency preparedness and response, (i) safeguarding compliance with environmental legislation; V. checking performance and taking corrective action, paying particular attention to: <ul style="list-style-type: none"> (a) monitoring and measurement (see also the JRC Reference Report on Monitoring of emissions to air and water from IED installations – ROM), (b) corrective and preventive action, recruitment, training, awareness and competence, (c) maintenance of records, (d) independent (where practicable) internal or external auditing in order to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained VI. review, by senior management, of the EMS and its continuing suitability, adequacy and effectiveness; VII. following the development of cleaner technologies; 	FC	<p>The operator has provided information to support compliance with BATc 1. We have assessed the information provided and reviewed the site compliance report dated May 2021. We are not satisfied that the operator has demonstrated compliance with certain aspects of BATc 1.</p> <p>Only limited information was provided by the operator. The operator has stated in their Regulation 61 response that the EMS was reviewed as part of the 2018 permit variation. This is incorrect due to the assessment of the EMS not being part of the permit application process.</p> <p>We have concerns that the over the maintenance and written schemes of examination demonstrating continued suitability of infrastructure onsite. And there are additional concerns over the contingency plan which requires improvement.</p> <p>The EMS is currently being reviewed as part of permit compliance. We consider that the operator will be future compliant with BATc 1. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>

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	<p>VIII. consideration for the environmental impacts from the eventual decommissioning of the plant at the stage of designing a new plant, and throughout its operating life;</p> <p>IX. application of sectoral benchmarking on a regular basis;</p> <p>X. waste stream management (see BAT 2);</p> <p>XI. an inventory of waste water and waste gas streams (see BAT 3);</p> <p>XII. residues management plan (see description in Section 6.5);</p> <p>XIII. accident management plan (see description in Section 6.5);</p> <p>XIV. odour management plan (see BAT 12)</p> <p>XV. noise and vibration management plan (see BAT 17).</p>		
2	<p>In order to improve the overall environmental performance of the plant, BAT is to use all of the techniques listed below:</p> <p>(a) Set up and implement waste characterisation and pre-acceptance procedures;</p> <p>(b) Set up and implement waste acceptance procedures;</p> <p>(c) Set up and implement a waste tracking system and inventory;</p> <p>(d) Set up and implement an output quality management system;</p> <p>(e) Ensure waste segregation;</p> <p>(f) Ensure waste compatibility prior to mixing or blending of waste;</p> <p>(g) Sort incoming solid waste</p>	FC	<p>The operator has provided information to support compliance with BATc 2. The information provided included references to PAS 100 and PAS 110 standard operating procedures (SOP), and an Odour Management Plan (OMP) submitted as part of the 2018 permit variation.</p> <p>The site has SOPs and quality management systems under PAS/QP for compost and digestate. The compost has recently been audited for compliance, and it was concluded that the system had been set up for operations but was not kept live, and there was no detail on what pre-acceptance or acceptance procedures would be followed for new or novel waste streams that may be accepted onto site. Waste streams were also identified as having been accepted which were not listed within the documents.</p> <p>The referenced waste acceptance and pre-acceptance SOP were not submitted with the Regulation 61 response, and have not been fully audited through compliance. The OMP does reference some acceptance criteria, but this mainly relates to odour controls.</p>

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			<p>Through compliance reviews, we are satisfied that the site has sufficient measures to meet BAT 2 (c), (e) and (f). We are also satisfied that the site works towards a recognised quality standard for waste outputs (d)</p> <p>We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 2 (a), (b) and (g). The operator can satisfy this requirement through submitting the waste acceptance and pre-acceptance procedures through compliance.</p> <p>We consider that the operator will be future compliant with BATc 2. Improvement condition 5 (has been included in the permit to achieve compliance (see Annex 3).</p>
3	<p>In order to facilitate the reduction of emissions to water and air, BAT is to establish and to maintain an inventory of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the following features:</p> <p>(i) information about the characteristics of the waste to be treated and the waste treatment processes, including: (a) simplified process flow sheets that show the origin of the emissions; (b) descriptions of process-integrated techniques and waste water/waste gas treatment at source including their performances;</p> <p>(ii) information about the characteristics of the waste water streams, such as: (a) average values and variability of flow, pH, temperature, and conductivity; (b) average concentration and load values of relevant substances and their variability (e.g. COD/TOC, nitrogen species, phosphorus, metals, priority substances /micropollutants); (c) data on bioeliminability (e.g. BOD, BOD to COD ratio, Zahn-Wellens test, biological inhibition potential (e.g. inhibition of activated sludge)) (see BAT 52);</p>	FC	<p>The operator has provided information to support compliance with BATc 3. The information provided included references to an Odour Management Plan (OMP) submitted as part of the 2018 permit variation.</p> <p>We have assessed the information provided. We are not satisfied that the operator has demonstrated compliance with BATc 3. We could not identify clear characterisation information (as listed by BATc 3) of all waste water and waste gas streams.</p> <p>We consider that the operator will be future compliant with BATc 3. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>

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	<p>(iii) information about the characteristics of the waste gas streams, such as:</p> <p>(a) average values and variability of flow and temperature;</p> <p>(b) average concentration and load values of relevant substances and their variability (e.g. organic compounds, POPs such as PCBs);</p> <p>(c) flammability, lower and higher explosive limits, reactivity;</p> <p>(d) presence of other substances that may affect the waste gas treatment system or plant safety (e.g. oxygen, nitrogen, water vapour, dust).</p>		
4	<p>In order to reduce the environmental risk associated with the storage of waste, BAT is to use all of the techniques given below:</p> <p>(a) Optimised storage location;</p> <p>(b) Adequate storage capacity;</p> <p>(c) Safe storage operation;</p> <p>(d) Separate area for storage and handling of packaged hazardous waste.</p>	FC	<p>The operator has provided information to support compliance with BATc 4. This includes the OMP submitted for the 2018 permit variation, and the Fire Prevention Plan.</p> <p>We have assessed the information provided. We are satisfied that BATc 4a is satisfied as this is an existing site. We are also satisfied that BATc 4(d) is not applicable to this site.</p> <p>We are not satisfied that the operator has demonstrated compliance with BATc 4 (b) and (c).</p> <p>BATc 4(b) compliance reviews has shown that digestate and dirty water storage have occasionally been insufficient. A review of capacity for digestate and dirty water has not been identified.</p> <p>BATc 4(c) we are not satisfied that the operator has demonstrated sufficient separation distances within composting operations to allow access for emergency services.</p> <p>We therefore consider that the operator will be future compliant with BATc 4. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>

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5	<p>In order to reduce the environmental risk associated with the handling and transfer of waste, BAT is to set up and implement handling and transfer procedures.</p> <p>Handling and transfer procedures aim to ensure that wastes are safely handled and transferred to the respective storage or treatment. They include the following elements:</p> <ul style="list-style-type: none"> • handling and transfer of waste are carried out by competent staff; • handling and transfer of waste are duly documented, validated prior to execution and verified after execution; • measures are taken to prevent, detect and mitigate spills; • operation and design precautions are taken when mixing or blending wastes (e.g. vacuuming dusty/powdery wastes). <p>Handling and transfer procedures are risk-based considering the likelihood of accidents and incidents and their environmental impact.</p>	CC	The operator has provided information to support compliance with BATc 5. We have assessed the information provided and reviewed the site compliance report. We are satisfied that the operator has demonstrated compliance with BATc 5.
6	For relevant emissions to water as identified by the inventory of waste water streams (see BAT 3), BAT is to monitor key process parameters (e.g. waste water flow, pH, temperature, conductivity, BOD) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation).	NA	We are satisfied that BATc 6 is not applicable to this Installation.
7	BAT is to monitor emissions to water with at least the frequency given in BATc 7, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	NA	We are satisfied that BATc 7 is not applicable to this Installation.
8	BAT is to monitor channelled emissions to air with at least the frequency given in BATc 8, and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.	FC	We consider that the operator will be future compliant with BATc 8, as the permit will stipulate frequency and standards of monitoring for channelled emissions to air, in accordance with BATc 8.
10	<p>BAT is to periodically monitor odour emissions.</p> <p>Odour emissions can be monitored using:</p>	FC	Please see BAT 8 above. The permit will stipulate 6 monthly monitoring of odour. We note that odour emissions are also currently periodically monitored.

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	<ul style="list-style-type: none"> EN standards (e.g. dynamic olfactometry according to EN 13725 in order to determine the odour concentration or EN 16841-1 or -2 in order to determine the odour exposure); when applying alternative methods for which no EN standards are available (e.g. estimation of odour impact), ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality. <p>The monitoring frequency is determined in the odour management plan (see BAT 12).</p>		We are satisfied the operation is will be compliant with BAT 10 in the future.
11	<p>BAT is to monitor the annual consumption of water, energy and raw materials as well as the annual generation of residues and waste water, with a frequency of at least once per year.</p> <p>Monitoring includes direct measurements, calculation or recording, e.g. using suitable meters or invoices. The monitoring is broken down at the most appropriate level (e.g. at process or plant/installation level) and considers any significant changes in the plant/installation.</p>	CC	<p>The operator has provided information to support compliance with BATc 11. We have assessed the information provided and reviewed the site compliance report. We are satisfied that the operator has demonstrated compliance with BATc 11.</p> <p>Limited information was provided as part of the Regulation 61 response. However we are satisfied based on the history of submitted information to the Environment Agency, that the operator currently meets the requirements for BAT 11. The permit requires regular reporting of these parameters.</p>
12	<p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> a protocol containing actions and timelines; a protocol for conducting odour monitoring as set out in BAT 10; a protocol for response to identified odour incidents, e.g. complaints; an odour prevention and reduction programme designed to identify the source(s); to characterise the contributions of the sources; and to implement prevention and/or reduction measures. 	FC	<p>The operator has provided information to support compliance with BATc 12. We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 12.</p> <p>We have reviewed the OMP which was submitted as part of the 2018 variation application. This was not approved by the Environment Agency due to it needing it updating, and was subsequently not included as an operating technique for the operator (Table S1.2 of the permit).</p>

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			<p>We have determined that there are outdated aspects to the operator's Odour Management Plan, and it therefore requires updating.</p> <p>We consider that the operator will be future compliant with BATc 12. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
13	<p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to use one or a combination of the techniques given below:</p> <p>(a) Minimising residence times; (b) Using chemical treatment; (c) Optimising aerobic treatment</p>	CC	<p>The operator has provided information to support compliance with BATc 13. We have assessed the information.</p> <p>We are satisfied that BATc 13 (b) is not applicable as the operator has confirmed it would hamper the desired quality output.</p> <p>We are satisfied that BATc 13 (c) is not applicable as the operator does not carry out aerobic treatment of liquid waste.</p> <p>We are satisfied that the measures stated within the OMP meet the requirements of BAT 13 (a). This includes seasonal management of peak volumes of waste.</p>
14	<p>In order to prevent or, where that is not practicable, to reduce diffuse emissions to air, in particular of dust, organic compounds and odour, BAT is to use an appropriate combination of the techniques given below:</p> <p>(a) Minimising the number of potential diffuse emission sources; (b) Selection and use of high-integrity equipment; (c) Corrosion prevention; (d) Containment, collection and treatment of diffuse emissions; (e) Dampening; (f) Maintenance;</p>	FC	<p>The operator has provided information to support compliance with BATc 14. We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 14.</p> <p>Only limited information was provided by the operator. More detail is required to identify how the techniques listed meet</p>

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	(g) Cleaning of waste treatment and storage areas; (h) Leak detection and repair (LDAR) programme		BAT, and whether there are any additional measures that contribute to meeting BAT. We consider that the operator will be future compliant with BATc 14. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).
15	BAT is to use flaring only for safety reasons or for non-routine operating conditions (e.g. start-ups, shutdowns) by using both of the techniques given below: (a) Correct plant design; (b) Plant management	NA	We are satisfied that BATc 15 is not applicable to this Installation.
16	In order to reduce emissions to air from flares when flaring is unavoidable, BAT is to use both of the techniques given below: (a) Correct design of flaring devices; (b) Monitoring and recording as part of flare management	NA	We are satisfied that BATc 16 is not applicable to this Installation.
17	In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to set up, implement and regularly review a noise and vibration management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements: I. a protocol containing appropriate actions and timelines; II. a protocol for conducting noise and vibration monitoring; III. a protocol for response to identified noise and vibration events, e.g. complaints; IV. a noise and vibration reduction programme designed to identify the source(s), to measure /estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and /or reduction measures.	NA	The operator has provided information to support compliance with BATc 17. We have assessed the information provided and reviewed the site compliance report. However, the applicability for BATc 17 is restricted to cases where a noise or vibration nuisance at sensitive receptors is expected and/or been substantiated. We consider that BATc 17 is not currently applicable. However condition 3.4 in the permit means that a noise and vibration management plan can be required should noise become an issue in the future.
18	In order to prevent or, where that is not practicable, to reduce noise and vibration emissions, BAT is to use one or a combination of the techniques given below: (a) Appropriate location of equipment and buildings;	CC	The operator has provided information to support compliance with BATc 18. We have assessed the information provided and reviewed the site compliance

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	(b) Operational measures; (c) Low noise-equipment; (d) Noise and vibration equipment; (e) Noise attenuation		report. We are satisfied that the operator has demonstrated compliance with BATc 18. Limited information was provided as part of the Regulation 61 response, however we are satisfied based on the history of submitted information to the Environment Agency, that the operator currently meets the requirements for BAT 18.
19	In order to optimise water consumption, to reduce the volume of waste water generated and to prevent or, where that is not practicable, to reduce emissions to soil and water, BAT is to use an appropriate combination of the techniques given below: (a) Water management; (b) Water recirculation; (c) Impermeable surface; (d) Techniques to reduce the likelihood and impact of overflows and failures from tanks and vessels; (e) Roofing of waste storage and treatment areas; (f) Segregation of water streams (g) Adequate drainage infrastructure; (h) Design and maintenance provisions to allow detection and repair of leaks (i) Appropriate buffer storage capacity	FC	The operator has provided information to support compliance with BATc 19. We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 19. Only limited information was provided by the operator. The information was insufficient to demonstrate that BATc 19 was met. We consider that the operator will be future compliant with BATc 19. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).
20	In order to reduce emissions to water, BAT is to treat waste water using an appropriate combination of the techniques given below: Preliminary and primary treatment, e.g. (a) Equalisation (b) Neutralisation (c) Physical separation, e.g. screens, sieves, grit separators, grease separators, oil-water separation or primary settlement tanks Physico-chemical treatment, e.g. (d) Adsorption (e) Distillation /rectification	NA	We are satisfied that BATc 20 is not applicable to this Installation. There are no permitted emissions to water, and treatment of water is not required for the current waste water outlet for use in agriculture.

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	<p>(f) Precipitation (g) Chemical oxidation (h) Chemical reduction (i) Evaporation (j) Ion exchange (k) Stripping</p> <p>Biological treatment, e.g. (l) Activated sludge process (m) Membrane bioreactor (n) Nitrification / denitrification when the treatment includes a biological treatment</p> <p>Solids removal, e.g. (o) Coagulation and flocculation (p) Sedimentation (q) Filtration (e.g. sand filtration, microfiltration, ultrafiltration) (r) Flotation</p> <p>See also: Table 6.1: BAT-associated emission levels (BAT-AELs) for direct discharges to a receiving water body</p> <p>See also: Table 6.2: BAT-associated emission levels (BAT-AELs) for indirect discharges to a receiving water body</p>		
21	<p>In order to prevent or limit the environmental consequences of accidents and incidents, BAT is to use all of the techniques given below, as part of the accident management plan (see BAT 1):</p> <p>(a) Protection measures; (b) Management of incidental /accidental emissions; (c) Incident /accident registration and assessment system</p>	CC	<p>The operator has provided information to support compliance with BATc 21. We have not been provided with all the documents referenced (EMS, OMP dated 2020). We have reviewed the OMP and Fire Prevention Plan submitted for the 2018 variation as part of this determination.</p>

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			<p>We are satisfied that the measures stated in the FPP and OMP demonstrate BATc 21.</p> <p>We further consider that the future review of the EMS, (BATc 1, Improvement condition 5) shall provide further evidence that BATc 21 has been met.</p>
22	<p>In order to use materials efficiently, BAT is to substitute materials with waste.</p> <p>Waste is used instead of other materials for the treatment of wastes (e.g. waste alkalis or waste acids are used for pH adjustment, fly ashes are used as binders).</p>	FC	<p>The operator did not provided information to support compliance with BATc 22.</p> <p>The operator states in their Regulation 61 response “processing converts waste materials into products with significant positive balance.” The statement is insufficient to demonstrate that BATc 22 was met. The use of raw materials such as ferric chloride have not been reviewed.</p> <p>We consider that the operator will be future compliant with BATc 22. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
23	<p>In order to use energy efficiently, BAT is to use both of the techniques given below:</p> <p>(a) Energy efficiency plan; (b) Energy balance record</p>	FC	<p>The operator did not provided evidence to support compliance with BATc 23. We are not satisfied that the operator has demonstrated compliance with BATc 23.</p> <p>We consider that the operator will be future compliant with BATc 23. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
24	<p>In order to reduce the quantity of waste sent for disposal, BAT is to maximise the reuse of packaging, as part of the residues management plan (see BAT 1).</p> <p>Packaging (drums, containers, IBCs, pallets, etc.) is reused for containing waste, when it is in good condition and sufficiently clean, depending on a compatibility check between</p>	FC	<p>The operator has provided information to support compliance with BATc 24. We have assessed the information provided and reviewed the site compliance</p>

BAT Conclusio n No	Summary of BAT Conclusion requirement for Waste Treatment	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	the substances contained (in consecutive uses). If necessary, packaging is sent for appropriate treatment prior to reuse (e.g. reconditioning, cleaning).		<p>report. We are not satisfied that the operator has demonstrated compliance with BATc 24.</p> <p>The operator stated that BATc 24 was not applicable as packaging wasn't used, and subsequently did not provide further information. We have determined that packaging is present on site, and therefore further evidence is required from the operator.</p> <p>We consider that the operator will be future compliant with BATc 24. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
33	<p>In order to reduce odour emissions and to improve the overall environmental performance, BAT is to select the waste input.</p> <p>The technique consists of carrying out the pre-acceptance, acceptance and sorting of the waste input (see BAT 2) so as to ensure the suitability of the waste input for the waste treatment, e.g. in terms of nutrient balance, moisture or toxic compounds which may reduce the biological activity.</p>	FC	<p>The operator has provided information to support compliance with BATc 33. We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 33.</p> <p>Only limited information was provided by the operator. The information was insufficient to demonstrate that BATc 33 was met. The operator's OMP submitted as part of the 2018 variation has a list of waste codes with an odour risk rating. This list of wastes needs to be updated to reflect the waste codes listed in the permit.</p> <p>We consider that the operator will be future compliant with BATc 33. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
34	In order to reduce channelled emissions to air of dust, organic compounds and odorous compounds, including H ₂ S and NH ₃ , BAT is to use one or a combination of the techniques given below:	BATc 34, Table 6.7 FC	<u>Environment Agency assessment</u>

BAT Conclusio n No	Summary of BAT Conclusion requirement for Waste Treatment	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	<p>(a) Adsorption; (b) Biofilter; (c) Fabric filter; (d) Thermal oxidation; (e) Wet scrubbing</p> <p>See also: Table 6.7: BAT-associated emission levels (BAT-AELs) for channelled NH₃, odour, dust and TVOC emissions to air from the biological treatment of waste.</p>		<p>The operator provided limited information to support compliance with BATc 34. Biofilters are installed at the facility on the AD building and IVC.</p> <p>We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 34. Further information is required to demonstrate the use of the abatement on site.</p> <p>We have set a BAT-AEL for ammonia as specified in the Waste Treatment BREF and BAT Conclusions.</p> <p>Improvement conditions (IC4 and IC5) have been included in the permit to achieve compliance. The operator is required to complete the improvement conditions and demonstrate compliance with the BAT-AEL by the compliance date, 17 August 2022.</p> <p>In addition to the BAT-AEL, we have inserted the requirement to monitor odour concentration, hydrogen sulphide and ammonia on a 6-monthly frequency in Table S3.3 (process monitoring).</p> <p>As part of the Environment Agency approach to reduce emissions in the biowaste treatment sector, we have included the following improvement conditions:</p> <p><u>Improvement condition for the review of effectiveness of abatement plant</u></p> <p>Improvement condition IC10 requires the operator to review abatement plant on site, in order to determine whether existing measures have been effective and adequate to prevent and /or minimise emissions released to air. Where</p>

BAT Conclusion No	Summary of BAT Conclusion requirement for Waste Treatment	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			<p>further improvements are identified, the operator is required to implement these measures.</p> <p><u>Improvement condition for the review of abatement plant design</u></p> <p>Improvement condition IC11 requires the operator to review the design of the site ventilation system and abatement plant in order to determine whether it is fit for purpose and effective in controlling odorous compounds in the air streams from site processes. Where further improvements are identified, the operator is required to implement these measures.</p>
35	<p>In order to reduce the generation of waste water and to reduce water usage, BAT is to use all of the techniques given below:</p> <p>(a) Segregation of water streams; (b) Water recirculation; (c) Minimisation of the generation of leachate</p>	FC	<p>The operator has provided information to support compliance with BATc 35. We have assessed the information provided and reviewed the site compliance report.</p> <p>We are not satisfied that the operator has demonstrated compliance with BATc 35 (a) or (c). The segregation of water streams has not been adequately described, and the methods to minimise leachate have not been described.</p> <p>We consider that the operator will be future compliant with BATc 35. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
36	<p>In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters. Monitoring and/or control of key waste and process parameters, including:</p> <ul style="list-style-type: none"> • waste input characteristics (e.g. C to N ratio, particle size); • temperature and moisture content at different points in the windrow; 	FC	<p>The operator has provided information to support compliance with BATc 36. We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 36.</p>

BAT Conclusion No	Summary of BAT Conclusion requirement for Waste Treatment	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	<ul style="list-style-type: none"> aeration of the windrow (e.g. via the windrow turning frequency, O₂ and/or CO₂ concentration in the windrow, temperature of air streams in the case of forced aeration); windrow porosity, height and width. 		<p>Only limited information was provided by the operator. The information was insufficient to demonstrate that BATc 36 was met.</p> <p>We consider that the operator will be future compliant with BATc 36, due to the monitoring requirements stated in the permit.</p>
37	<p>In order to reduce diffuse emissions to air of dust, odour and bioaerosols from open-air treatment steps, BAT is to use one or both of the techniques given below:</p> <p>(a) Use of semi permeable membrane covers; (b) Adaptation of operations to the meteorological conditions</p>	FC	<p>The operator has provided information to support compliance with BATc 37. We have assessed the information provided. We are not satisfied that the operator has demonstrated compliance with BATc 37 (a) or (b).</p> <p>Only limited information was provided by the operator. The information was insufficient to demonstrate that BATc 37 was met. We could not identify clear descriptions on the management of windrows to prevent diffuse emissions.</p> <p>We consider that the operator will be future compliant with BATc 37. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).</p>
38	<p>In order to reduce emissions to air and to improve the overall environmental performance, BAT is to monitor and/or control the key waste and process parameters.</p> <p>This includes monitoring and/or control of key waste and process parameters:</p> <ul style="list-style-type: none"> pH and alkalinity of the digester feed; digester operating temperature; hydraulic and organic loading rates of the digester feed; concentration of volatile fatty acids (VFA) and ammonia within the digester and digestate; biogas quantity, composition (e.g. H₂S) and pressure; liquid and foam levels in the digester. 	FC	<p>The operator has provided information to support compliance with BATc 38. We have assessed the information provided and reviewed the site compliance report. We are not satisfied that the operator has demonstrated compliance with BATc 38.</p> <p>Only limited information was provided by the operator. The information was insufficient to demonstrate that BATc 38 was met.</p>

BAT Conclusio n No	Summary of BAT Conclusion requirement for Waste Treatment	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			We consider that the operator will be future compliant with BATc 38. due to the monitoring requirements stated in the permit.
39	<p>In order to reduce emissions to air, BAT is to use both of the techniques given below:</p> <p>(a) Segregation of the waste gas streams; (b) Recirculation of waste gas</p>	NA	BATc 39 is applicable to mechanical biological treatment only. We are satisfied that BATc 39 is not applicable to this Installation.

Annex 2: Review and assessment of changes that are not part of the BAT Conclusions derived permit review

Existing Medium Combustion Plant

We asked the operator to provide information on all combustion plant on site in the Regulation 61 Notice as follows:

- Number of combustion plant (CHP engines, back-up generators, boilers);
- Size of combustion plant – rated thermal input (MWth)
- Date each combustion plant came into operation
- Confirmation as to whether or not the combustion plant is subject to a capacity market agreement (2014 or 2015 auction) or whether or not a Feed-in Tariff preliminary accreditation application was received prior to 1 December 2016

The operator provided the information in the table below:

Combined heat and power (CHP) engines

1. Rated thermal input (MW) of the medium combustion plant.	CHP engine 1 – 1.5 MWth CHP engine 2 – 1.5 MWth CHP engine 3 – 1.5 MWth Auxiliary Boiler – 1 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	CHP 1 – 3 Combined heat and power engines Auxiliary boiler
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Biogas
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	before 20 December 2018
5. Confirmation of capacity market agreement arising from 2014 or 2015 capacity auctions.	Not applicable
6. Confirmation of Feed-in Tariff preliminary accreditation application received by the Gas and Electric Markets Authority prior to 1 December 2016.	Not applicable

We have reviewed the information provided and we consider that the declared combustion plant qualify as “existing” medium combustion plant.

For existing MCP with a rated thermal input of less than or equal to 5 MW, the emission limit values set out in tables 1 and 3 of Part 1 of Annex II MCPD shall apply from 1 January 2030.

We have included the appropriate emission limit values for existing medium combustion plant as part of this permit review. See Table S3.1 in the permit.

Bioaerosols monitoring requirements

We asked the operator to confirm the following aspects regarding the site operations in the Regulation 61 Notice:

- Whether or not the operational processes of biodegradable waste are in open processes within 250 metres of human receptors.
- Whether or not there is a channelled or point source release within 250 metres that are open sources e.g. biofilters within 250 metres of human receptors; and
- The existing permit contains bioaerosols monitoring requirements, the microbiological markers, associated bioaerosols limits and the monitoring standards

The operator provided information regarding bioaerosols monitoring in their response to the Regulation 61 Notice. We carried out an assessment of the site location and the distance of site processes from sensitive receptors as part of this determination.

There are no external site operational processes and/or channelled point sources within 250 metres of a sensitive receptor. Monitoring of bioaerosols is not required at the Installation.

The only property within 250m of the site is owned and lived in by the operator. All residents within this property are operators of the site. This property is therefore not considered a sensitive receptor and a bioaerosol risk assessment is not required.

A statement has been provided by the operator (email reference: Application Variation - Statement regarding residents of the property, dated 14/06/18), that should the residents within this property change, and therefore the status of the property change to being a sensitive receptor, then the operator will notify the Environment Agency and will provide a bioaerosol risk assessment.

Soil & groundwater risk assessment (baseline report)

The IED requires that the operator of any IED installation using, producing or releasing “relevant hazardous substances” (RHS) shall, having regarded the possibility that they might cause pollution of soil and groundwater, submit a “baseline report” with its permit application. The baseline report is an important reference document in the assessment of contamination that might arise during the operational lifetime of the regulated facility and at cessation of activities. It must enable a quantified comparison to be made between the baseline and the state of the site at surrender.

At the definitive cessation of activities, the operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site’s current or approved future use. To do this, the operator has to submit a surrender application to us, which we will not grant unless and until we are satisfied that these requirements have been met.

The operator submitted a site condition report [reference - Site Condition Report received on 30/10/2017]. The site condition report included a report on the baseline conditions as required by Article 22. We reviewed that report and considered that it adequately described the condition of the soil and groundwater at that time.

The operator submitted a summary report which referenced the site condition report and baseline report. We have reviewed the information and we consider that that it adequately describes the condition of the soil and groundwater. Consequently, we are satisfied that the baseline condition has not changed.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility. The wastes are specified in Tables S2.3, S2.4, S2.5 and S2.6 in the permit.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate
- the environmental risk assessment is acceptable.

Other wastes (non-standard waste codes)

The following wastes in the current permit are not specified in the our revised biowaste treatment permit templates. We have retained these wastes in the current permit provided the operator undertakes a detailed characterisation of the wastes prior to acceptance for treatment at the site in accordance with BATc 2a.

Waste code	Description
02 01 02	animal-tissue waste
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 02	green liquor sludge
03 03 08	paper and cardboard – not allowed if any non-biodegradable coating or preserving substance is present
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 02 10	organic matter from natural products (un-dyed and untreated only)
17 02 01	wood
19 12 07	wood other than that mentioned in 19 12 06
20 01 38	untreated wood where no non-biodegradable coating or preserving substance is present

We consider that the operator will be future compliant with BATc 2a. Improvement condition 5 has been included in the permit to achieve compliance (see Annex 3).

We made this decision with respect to waste types in accordance with the Framework Guidance Note – *Framework for assessing suitability of wastes going to anaerobic digestion, composting and biological treatment* (July 2013).

Excluded wastes (99 waste codes)

We have excluded the following waste streams ending with “99” code(s) because more suitable waste codes are already in the European Waste Catalogue (EWC) that accommodate the waste described:

Waste code	Description
02 02 99	sludges from gelatine production, animal gut contents
02 07 99	spent grains, hops and whisky filter sheets/cloths, yeast and yeast-like residues, sludge from production process
19 05 99	liquor from aerobic treatment of source segregated biodegradable waste

Our technical guidance on waste classification WM3 specifically sets out clear instructions for the use of the European Waste Catalogue (EWC), particularly with regard to “99” codes.

The guidance specifies that the operator must:

- Identify the source generating the waste in chapters 01 to 12 or 17 to 20 and identify the appropriate six-digit code of the waste (excluding codes ending with 99 of these chapters).
- If no appropriate waste code can be found in chapters 01 to 12 or 17 to 20, the chapters 13, 14 and 15 must be examined to identify the waste.
- If none of these waste codes apply, the waste must be identified according to chapter 16.
- If the waste is not in chapter 16, the 99 code (wastes not otherwise specified) must be used in the section of the list corresponding to the activity identified in step one as a last resort.

We made this decision with respect to “99” codes in accordance with the Technical Guidance WM3: Waste Classification – Guidance on the classification and assessment of waste [1st Edition v1.1, May 2018].

Secondary containment and lagoon storage infrastructure design

We asked the operator via the Regulation 61 Notice to:

- describe any secondary containment and whether it currently meets the relevant standard in the “Containment systems for the prevention of pollution (C736)” report, where there are above-ground storage or primary containment on site; or
- explain why the current site infrastructure design and construction is fit for purpose, where it is concluded that secondary containment is not required or does not need to meet the standards in the C736 report, to enable a baseline standard so as to establish a quantified comparison; and

- describe how the construction of the lagoons meets the relevant standard in CIRIA C736 report, where there are storage lagoons used for the storage of digestate on site.

Assessment of existing secondary containment & lagoon storage design and construction

The operator did not provide a sufficient response to the Regulation 61 Notice with respect to the existing site secondary containment and lagoon storage infrastructure. We therefore were not able to assess the information. Limited information was given with regards to the secondary containment on site, including design information for 1 lagoon. A full review of all areas of secondary containment and all lagoons has not been provided.

We have set improvement conditions in the permit to address the deficiencies in the existing site secondary containment (IC7) and lagoon storage infrastructure (IC8). See Improvement conditions in Annex 3 of this decision document.

Primary containment infrastructure design (tanks /vessels used for storage and/or treatment activities)

We assessed primary containment as part of the permit review. This information was not requested in the Regulation 61 Notice issued to the operator, however, it was considered prudent to address this aspect as part of the permit review process. In this instance, the required information relating to the review of primary containment infrastructure against CIRIA C535 was not previously submitted to the Environment Agency, nor was it included in the supporting documentation submitted by the operator in their Regulation 61 response.

We have therefore set an Improvement Condition (IC6) in the permit to address this aspect of the permit review (see Annex 3).

Lagoon cover and digestate storage capacity

We asked the operator via the Regulation 61 Notice to:

- confirm if storage lagoons are covered to prevent emission loss; and
- confirm whether or not the operational lagoon storage capacity provides a minimum of two months storage

The operator provided insufficient information in response to lagoon cover arrangements and operational digestate storage capacity on site.

We have therefore set an Improvement Condition (IC9) in the permit to address this aspect of the permit review (see Annex 3).

Annex 3: Improvement Conditions

Based on the information in the operator's Regulation 61 Notice response and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the BAT Conclusions are achieved by the installation. These improvement conditions are set out below - justifications for them is provided at the relevant section of the decision document (Annex 1 or Annex 2).

If the consolidated permit contains existing improvement conditions that are not yet complete or the opportunity has been taken to delete completed improvement conditions then the numbering in the table below will not be consecutive as these are only the improvement conditions arising from this permit variation.

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The operator shall submit a revised odour management plan for the IVC and Windrow operations to the Environment Agency for written approval. The plan shall take into account the appropriate measures for odour control specified in section 2.2.6 of Sector Guidance Note IPPC S5.06 – <i>Guidance for the Treatment of Hazardous and Non Hazardous Waste</i> . The plan shall also incorporate all the required detailed information as specified in the Environment Agency's Horizontal Guidance H4 – <i>Odour Management</i> . The plan must contain dates for implementation of individual measures.	Completed
IC2	The operator shall develop and submit for the IVC and Windrow composting operations a fire prevention plan to the Environment Agency in writing. The plan shall take into account the required information as specified in the Environment Agency's technical guidance, Fire prevention plans (version 2, dated March 2015). The appropriate measures for fire prevention shall include: <ul style="list-style-type: none"> • the management of storage of feedstock, product and/or waste piles • measures to prevent, detect and contain fires; and • the management of firewaters. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the written proposals. The operator shall implement the procedures and measures in accordance with the Environment Agency's written approval.	Completed
IC3	The Operator shall produce, and submit for approval and subsequent implementation, an Accident Management Plan for the IVC and Windrow operations. The procedures must contain dates for implementation of individual measures.	Completed
Improvement condition for progress report to achieve BAT-AELs		

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC4	<p>The operator shall submit, for approval by the Environment Agency, a report setting out progress to achieving the Best Available Techniques Conclusion Associated Emission Levels (BAT-AELs) where BAT is currently not achieved, but will be achieved before 17 August 2022. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Current performance against the BAT-AEL. 2) Methodology for reaching the BAT-AEL. 3) Associated targets /timelines for reaching compliance by 17 August 2022. 4) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Waste Treatment with respect to the following:</p> <ul style="list-style-type: none"> • BAT 34 Table 6.7 (compliance with BAT-AEL for channelled NH₃, emissions to air from the biological treatment of waste) <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	<p>Progress report three monthly intervals from date of permit issue: 10/06/2022</p>
Improvement condition for progress report to achieve Narrative BAT		
IC5	<p>The operator shall submit, for approval by Environment Agency, a report setting out progress to achieving the 'Narrative' BAT where BAT is currently not achieved, but will be achieved before 17 August 2022. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Methodology for achieving BAT 2) Associated targets /timelines for reaching compliance by 17 August 2022 3) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Waste Treatment with respect to BAT 1, 2, 3, 4, 12, 14, 19, 22, 23, 24, 33, 34, 35, and 37.</p>	<p>Progress report three monthly intervals from date of permit issue: 10/06/2022</p>
Improvement condition for primary containment		
IC6	<p>The operator shall submit a written 'primary containment plan' and shall obtain the Environment Agency's written approval to it. The plan shall contain the results of an inspection and program of works undertaken by a qualified engineer, and shall assess the extent design specification and condition of primary containment systems where polluting liquids and solids are being stored, treated, and/or handled.</p> <p>The plan shall include:</p> <ul style="list-style-type: none"> • an assessment of the physical condition of all primary containment systems (storage and treatment vessels) using a Written Scheme of Examination and their suitability for providing primary containment when subjected to the dynamic and static loads caused by catastrophic tank failure; 	<p>17/08/2022 or other date as agreed in writing with the Environment Agency</p>

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ul style="list-style-type: none"> a program of works with timescales for the implementation of individual improvement measures necessary to demonstrate that the primary containment is fit for purpose or alternative appropriate measures to ensure all polluting materials will be contained on site; and a preventative maintenance and inspection regime <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>	
Improvement condition for secondary containment design		
IC7	<p>The operator shall submit a written 'secondary and tertiary containment plan' and shall obtain the Environment Agency's written approval to it. The plan shall contain the results of an inspection and program of works undertaken by a competent structural engineer, in accordance with the risk assessment methodology detailed within CIRIA C736 (2014) guidance, of the condition and extent of secondary and tertiary containment systems where all polluting liquids and solids are being stored, treated, and/or handled.</p> <p>The inspection shall consider, but not be limited to, the storage vessels, bunds, loading and unloading areas, transfer pipework/pumps, temporary storage areas, and liners underlying the site.</p> <p>The plan shall include:</p> <ul style="list-style-type: none"> an assessment of the physical condition of all secondary and/or tertiary containment systems, using a Written Scheme of Examination and their suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure; a program of works with timescales for the implementation of individual improvement measures necessary for the secondary and/or tertiary containment systems to comply with CIRIA C736 (2014) guidance, or equivalent. a preventative maintenance and inspection regime <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>	17/08/2022 or other date as agreed in writing with the Environment Agency
Improvement condition for storage lagoon design		
IC8	<p>The operator shall submit a written 'storage lagoon plan' and shall obtain the Environment Agency's written approval to it. The plan shall contain the results of an inspection and program of works undertaken by a competent structural engineer, in accordance with the risk assessment</p>	17/08/2022 or other date as agreed in writing with the

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>methodology detailed within CIRIA C736 (2014) guidance, of the condition and extent of the site lagoon(s) where digestate or compost leachate are being stored, treated, and/or handled.</p> <p>The inspection shall consider, but not be limited to, the transfer pipework/pumps, and liners underlying the storage lagoon.</p> <p>The plan shall include:</p> <ul style="list-style-type: none"> • an assessment of the physical condition of the storage lagoon, using a Written Scheme of Examination and the suitability for providing containment when subjected to the dynamic and static loads caused by the digestate or compost leachate; • a program of works with timescales for the implementation of individual improvement measures necessary for the storage lagoon to comply with CIRIA C736 (2014) guidance, or equivalent. • a preventative maintenance and inspection regime <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>	Environment Agency
Improvement condition for lagoon cover and operational storage capacity		
IC9	<p>The operator shall provide a written "digestate /compost liquor storage plan" and shall obtain the Environment Agency's written approval to it. The plan shall contain the results of a review of the current storage of digestate and/or compost liquor produced from site operations. The review shall examine site contingency arrangements in the event of closed landspreading periods, extreme weather conditions, site closure, disease outbreak etc.</p> <p>The storage plan shall include:</p> <ul style="list-style-type: none"> • Existing cover arrangements on storage lagoons used to store digestate and/or compost liquor to minimise odour, ammonia and methane emissions; • Additional storage capacity on-site (at least 2 months storage) and storage capacity off-site; • Identification of alternative outlets for digestate and/or compost liquor – identify companies /permitted waste facilities that would be able to manage the digestate and/or liquor output(s), taking into account their permits and capacity constraints. <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>	17/08/2022 or other date as agreed in writing with the Environment Agency
Improvement condition for review of effectiveness of abatement plant		

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC10	<p>The operator shall carry out a review of the abatement plant on site, in order to determine whether the measures have been effective and adequate to prevent and where not possible minimise emissions released to air including but not limited to odour and ammonia.</p> <p>The operator shall submit a written report to the Environment Agency following this review for assessment and approval.</p> <p>The report shall include but not limited to the following aspects:</p> <ul style="list-style-type: none"> • Full investigation and characterisation of the waste gas streams. • Abatement stack monitoring results (not limited to odour and ammonia) • Abatement process monitoring results (not limited to odour and ammonia) • Details of air quality quantitative impact assessment including modelling and a proposal for site-specific “action levels” (not limited to odour concentration, hydrogen sulphide and ammonia). • Odour monitoring results at the site boundary • Records of odour complaints and odour related incidents • Recommendations for improvement including the replacement or upgrading the abatement plant • Timescales for implementation of improvements to the abatement plant <p>The operator shall implement the improvements in line with the timescales as approved by the Environment Agency.</p>	17/08/2022 or other date as agreed in writing with the Environment Agency
Improvement condition for review of abatement plant design		
IC11	<p>The operator shall submit to the Environment Agency a written review report of the design details of the site ventilation system and abatement plant and obtain the Environment Agency's written approval to it.</p> <p>The report shall include but not limited to:</p> <ol style="list-style-type: none"> a) Ventilation design performance criteria for effective fugitive odorous emission control b) Design of the abatement systems that will ensure compliance with the odour condition 3.3. The report shall include a demonstration (whether by a detailed review of technical papers or by trial results) that all odorous chemical compounds and their loading rates expected in the relevant air streams have been considered in the design; and supporting evidence that the odorous compounds will be controlled and/or 	17/08/2022 or other date as agreed in writing with the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>abated either by operating techniques or by the proposed abatement systems.</p> <p>c) Design alarms and triggers for each relevant scenario to alert the operator to the malfunction of both ventilation and abatement systems. The report should further list all relevant contingency mitigation actions to minimise risk of elevated odour pollution from the installation linked to each malfunction scenario and detail the actions to restore systems to normal operating conditions for effective odour control.</p> <p>Ventilation and abatement systems should be designed by suitably qualified named engineers who can supervise and sign-off on construction quality assurance.</p>	
Improvement condition for assessment of methane slip		
IC12	<p>The operator shall establish the methane emissions in the exhaust gas from engines burning biogas and compare these to the manufacturer's specification and benchmark levels agreed in writing with the Environment Agency. The operator shall, as part of the methane leak detection and repair (LDAR) programme, develop proposals to assess the potential for methane slip and take corrective actions where emissions above the manufacturer's specification or appropriate benchmark levels are identified.</p>	<p>17/08/2022 or other date as agreed in writing with the Environment Agency</p>