

Permitting Decisions- Bespoke Permit

We have decided to grant the permit for LYC 10 Data Centre operated by SOF-11 Docklands DC UK BIDCO Limited.

The permit number is EPR/QP3108ST.

The application is for:

A Data Centre which consists of a Schedule 1 Part A(1) 1.1(a) activity under the Environmental Permitting Regulations for the burning of any fuel in an appliance with a rated thermal input of 50 or more megawatts (MW).

The combustion plant comprises 9 standby diesel generators, with aggregated total combustion capacity on-site of approximately 74.3 MWth. The diesel generators are solely used to provide standby electricity generation capacity to power the data centre in the event of a grid power failure.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It:

- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- highlights key issues in the determination
- shows how we have considered the consultation responses

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit.

Key issues of the decision

BAT assessment

Choice of Fuel

Low sulphur gas oil is to be used onsite. Fuel will periodically undergo fuel polishing to help remove suspended solids and impurities. This helps ensure efficient combustion and it also increases the expected life of the fuel.

The Applicant is investigating the option of using HVO (hydrotreated vegetable oil) as an alternative fuel. Consequently, we have specified the fuel to be burned in the engines to consist of gas oil or equivalent substitute to be agreed in writing with the Environment Agency with a sulphur concentration of 0.001% w/w. We are in the process of developing our position on the use of gas oil substitute fuels such as HVO, therefore we have required, in table S2.1, that if any of these fuels are proposed, written agreement is sought by the Operator from the Environment Agency's regulatory officer.

Assessment against BAT for engines

We reviewed the application against our "Data Centre FAQ Headline Approach" document as part of our assessment of BAT.

The Applicant assessed the options for standby generators and concluded that although gas generators outperform diesel generators on air emissions, they are inferior when comparing their cold start capability and their reliability in providing an uninterrupted power supply, due to the reliance on an off-site supply of natural gas. We accept that oil fired diesel generators are presently the default technology for standby generators in data centres, and accept this conclusion.

The Environment Agency considers that the default engine specification as a minimum for new plant to minimise the impacts of emissions to air (NO_x) is 2g TA-Luft (or equivalent standard). The Applicant has confirmed they will be using this standard of engine.

Minimising Outages

The Applicant has confirmed that there will be separate power supply routes to minimise the likelihood of an outage should one supply route fail. Consequently, a site wide failure is considered to be extremely rare as it would require a catastrophic regional failure on the grid, or at the supplying power station, and would likely impact not only the site but the majority, if not all of, London city.

The Grid power supply to the site is highly reliable. The overall reliability of supply for the National Grid Electricity Transmission (NGET) System during 2019-20 was >99.999974%. Thus, outages are considered to be highly rare; 1 in 10 if not a 1 in 20 year event

Emissions to air

Human Health

The Air quality assessment (AQA) considered the following four operating scenarios:

- **Scenario 1:** Monthly test – this will be offload (0% load) tests for 30 minutes on a weekend with only 1 generator operating concurrently;
- **Scenario 2:** Annual test – this will be onload (75% load) for 3 hours on a weekend with only 1 generator operating concurrently (this is inclusive of Scenario 1 with the annual test replacing one of the monthly tests);
- **Scenario 3:** Emergency power outage – at a worst-case this will be onload (75% load) for 5 hours with all 9 generators operating cumulatively (In general only the generators required to carry site load would operate); and
- **Scenario 4:** Power outage –this will be onload (75% load) for 72 hours with all 9 generators operating cumulatively. This scenario is extremely unlikely and was undertaken at the request of the Environment Agency

The Applicant calculated the annual mean process contributions (PCs) for all scenarios using appropriate factors to represent the annual operational hours for each scenario based on 54 hours, 76.5 hours, 5 hours and 72 hours for Scenarios 1 to 4, respectively. Scenario 2 represents the Long Term PCs for normal operation during a year where no emergency power outage events occurred as it includes the 11 monthly tests and 1 annual test.

The Applicant used ADMS 5.2 air dispersion modelling software to predict impacts of emissions from the facility. They used five years of meteorological data observed at London City Airport station (located approximately 4 km east of the installation) from years 2015 to 2019. The meteorological conditions observed at this station are likely to be representative.

The Environment Agency carried out detailed dispersion modelling to check the Applicants conclusions, and we calculated values are below the mass emission rates used by the Applicant. Our checks indicate that the Applicant has made an error in calculating the emission rates from the pollutant concentrations reported in the specification sheet. Our calculated values are approximately 33% to 45% of those reported by the Applicant for the majority of pollutant emissions. Therefore, the Applicant's modelling assessment is based on worst-case, but unrealistic, pollutant emission rates. We tested sensitivity to more realistic emission rates in our check modelling.

The Applicants PCs and predicted environmental concentrations (PECs) at human receptors are summarised in section 5 of the revised AQA.

Scenario 1

For Scenario 1, the Applicant has used statistical analysis (hypergeometric probability distribution) to determine the probability of the 1-hour NO₂ PEC exceeding the 1-hour NO₂ ES. The results in Table 26 of the revised AQA shows that the probability of exceedance at all receptors is <0.1%.

The Applicant does not predict exceedances of the Environmental Quality Standards (EQSs) for any other pollutant during Scenario 1.

Scenario 2

For Scenario 2, the Applicant does not predict exceedances of the EQSs for any pollutant. As for Scenario 1, the Applicant presents the results of statistical analysis to determine the probability of exceedance of the 1-hour NO₂ EQS. The results in Table 36 of the AQA shows that the probability of exceedance at all receptors is <0.1%, except for R16 (City Reach, the adjacent commercial building to the south of the installation) which is 0.5%. As this is less than 5%, the Applicant concludes that operation of the diesel generators under Scenario 2 is acceptable.

Scenario 3

For a 5-hour emergency power outage event, the Applicant predicts exceedances of the 1-hour NO₂ EQS should the event coincide with the worst-case meteorological conditions. They have used hypergeometric probability distribution to assess the likelihood of exceedances of 1-hour NO₂ EQS and they predict a greater than 5% chance of an exceedance at 17 human receptors. The Applicant also predicted an exceedance of the 24-hour PM₁₀ EQS at one receptor (R16, the adjacent office/commercial building). The Applicant considers that predicted concentrations are likely to be an overestimation of actual concentrations given that Scenario 3 is considered to be a highly rare event (1 every 10 years) and only the generators required to meet the electrical load will be operating for a maximum of 5 hours.

Our interpretation of the results for this scenario are that it would not be possible to exceed the 1-hour NO₂ EQS or 24-hour PM₁₀ EQS's given that the duration of the emissions in any year is only 5 hours. As the 1-hour NO₂ EQS permits 18 exceedances of 200 µg/m³ per year and the 24-hour PM₁₀ EQS permits 35 exceedances of 50 µg/m³ per year, an event which occurs for only 5 hours would not cause an exceedance of these ESs.

For a 5-hour emergency power outage event, the Applicant does not predict exceedances of the EQSs for any other pollutant.

Scenario 4

For a 72-hour emergency power outage event, The Applicant predicts exceedances of the 1-hour NO₂ EQS should the event coincide with the worst-case meteorological conditions. They have used hypergeometric probability distribution to assess the likelihood of exceedances of the EQS and they predict a greater than 5% chance of an exceedance at all human receptors (100% probability of exceedance at the majority of the receptors). The Applicant also predicted an exceedance of the 24-hour PM₁₀ EQS at one receptor (R16, the adjacent office/commercial building). The Applicant considers that predicted concentrations are likely to be an overestimation of actual concentrations given that Scenario 4 is considered to be a highly rare event (1 every 10 years) and only the generators required to meet the electrical load will be operating. The Applicant

also states that the modelling results for Scenario 4 cannot determine the significance of impacts of the development site.

For a 72-hour emergency power outage event, the Applicant does not predict exceedances of the EQS's for any other pollutant.

Environment Agency check modelling

We carried out detailed check dispersion modelling and sensitivity analysis based on the Applicants modelling files using ADMS 5.2 for Scenarios 1 to 4:

Scenario 1 (monthly test scenario), we agree that there is unlikely to be an exceedance of any EQS at all receptors.

Scenario 2 (annual service test scenario), we agree that there is unlikely to be an exceedance of the short-term NO₂ EQS at all receptors. However, we consider that there is likely to be an exceedance of the non-statutory NO₂ Acute Exposure Guideline Level (AEGL-1) and 1-hour mean NO EAL at receptor R16 (City Reach Building).

The Applicant modelled a receptor point on the closest part of the City Reach building roof to the nearest diesel generator exhaust stacks as a conservative approach to represent possible location for the HVAC air inlets for this building. Based on aerial images of the office building roof, the air inlets are likely to be further south of the modelled receptor location and, therefore, further from the diesel generator exhaust stacks.

Consequently, we have set pre-operating condition (PO1) requiring the operator to:

- Review the AQA with regards to the location of the City Reach building HVAC air inlets to determine if the NO₂ AEGL-1 and 1-hour mean NO EAL are likely to be breached and/or
- Provide a copy of annual test operating procedure that demonstrates that the annual test will not occur when the wind direction is towards the city reach building, thereby eliminating the risk of a breach of the NO₂ AEGL-1 and 1-hour mean NO EAL.

Scenario 3 (5-hour emergency power outage event) we found that:

- There are no modelled exceedances of the EQSs at human receptors for any pollutants, except for 1-hour NO₂ concentrations. However, based on the 5-hour duration of Scenario 3, there is unlikely to be an exceedance of the 1-hour NO₂ EQS (as the EQS permits 18 exceedances per year).
- There is likely to be an exceedance of the non-statutory NO₂ 10 minute Acute Exposure Guideline Level, level 1 (AEGL-1) and 1-hour mean NO EAL at receptor R16 (City Reach) should an emergency power outage occur, even for a short period of up to 1 hour.

Scenario 4 (72-hour emergency power outage event) we found that:

- There are no modelled exceedances of the EQSs at human receptors for any pollutants, except for 1-hour NO₂ concentrations. However, based on our check modelling and statistical analysis (hypergeometric probability distribution), exceedances of the 1-hour NO₂ EQS are unlikely provided emergency power outage events do not occur for more than 39 hours per year.

There is likely to be an exceedance of the non-statutory NO₂ AEGL-1 and 1-hour mean NO EAL at receptor R16 (City Reach) should an emergency power outage occur, even for a short period of up to 1 hour.

As described above, there is likely to be a breach of the EQS's as a result of the scenarios 3 and 4. Whilst these scenarios are considered extremely unlikely to occur for the durations modelled, we have set an improvement condition (IC1) in table S1.3 of the permit requiring that an Air Quality Management Plan (AQMP) will be prepared. The aim of this will be to minimise the impact on local air quality during emergency operation of the diesel generators onsite.

Habitats assessment

Using Environment Agency guidance distance criteria, the Applicant assessed 25 ecological receptors identified within 10 km for SACs, SPAs and Ramsar sites; and 2 km for Sites of Special Scientific Interest (SSSI) and local nature sites.

The Applicant assessed impacts against annual and daily mean NO_x critical levels and used AQTAG06 guidance to assess impacts against nutrient nitrogen and acid deposition critical loads for all operating scenarios. They selected critical load values using data from the APIS website (Air Pollution Information System www.apis.ac.uk). Our checks confirm they selected the correct values.

Results

Scenario 1 and 2 (monthly and annual testing)

The consultant's modelled PCs for NO_x, SO₂, nitrogen and acid deposition are not significant for these two scenarios, and our check modelling supports this conclusion

Scenario 3 and 4 (5-hour & 72-hour emergency power outage events)

The Applicant predicts that the annual mean NO_x PCs are less than 1% of the critical level for both scenarios, except for one local nature site (Mudchute Park and Farm SINC/LNR) where the PC is 2.8% of the critical load which is lower than the 100% criteria for local sites.

For emergency power outage events coinciding with the worst-case meteorological conditions, the daily mean NO_x PCs exceed the critical level of 75 µg/m³ for all local nature sites and are greater than 10% of the critical level for the 2 European designated sites (Epping Forest SAC, and Lee Valley SPA/Ramsar) . However, Applicant has not made any adjustment to the PCs for Scenario 3 to account for the 5-hour duration of emissions.

The nutrient nitrogen and acid deposition PCs are reported by the Applicant to be less than 1% of the critical loads at all ecological receptors, except for Mudchute Park and Farm SINC/LNR where the nutrient nitrogen deposition is 2.4% which, again, is lower than the 100% criteria for local sites.

The Applicant does not predict exceedances of the annual mean SO₂ critical level and PCs are modelled to be insignificant.

The Applicant states that the modelling results for Scenario 3 and Scenario 4 cannot determine the significance of impacts of the development site. The Applicant considers that predicted concentrations for Scenario 3 and Scenario 4 are likely to be an overestimation of actual concentrations given that power outage events are considered to be a highly rare event (1 every 10 years) and only the generators required to meet the electrical load will be operating.

Our check modelling indicates that an exceedance is likely at only one local nature site (Mudchute Park and Farm SINC/LNR) for both power outage scenarios. Our statistical analysis indicates that exceedances are unlikely should an emergency power outage event last for less than two consecutive days. An outage of 72 hours is an extremely unlikely scenario (see section on minimising outages above) and was only modelled by the Applicant at our request.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

We consulted the local authority, Food Standards Agency, Health and Safety Executive, Director of Public health and Public Health England (now UK Health Security Agency).

A response from the UK Health Security Agency was received, and their comments are addressed in the consultation response section of this document.

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation', and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.

The operator has provided the grid reference for the emission points from the medium combustion plants.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided a plans which we consider to be satisfactory.

These show the extent of the site of the facility including the discharge points.

A plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations

identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

See key issues section of this document for further details.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

Noise

A noise impact assessment has been completed which identifies sensitive receptors and potential sources of noise from the installation. The primary noise sources are the diesel generators. This report identified that there were no significant impacts predicted from site operations under all scenarios, we have used our Qualitative Noise Screening Assessment Tool (v11) and agree with this conclusion .

Emissions to Air

The assessment shows that, applying the conservative criteria in our guidance on environmental risk assessment or similar methodology supplied by the operator and reviewed by ourselves, all emissions may be screened out as environmentally insignificant with the exception of emissions of oxides of nitrogen (see key issues section for more details).

General operating techniques

Discharge to Sewer

Under normal conditions there is no discharge to sewer other than surface water run-off and sanitary effluent.

Diesel Storage

The installation will generally store enough diesel to provide 72 hours' worth of electricity to the site. Bulk diesel tanks are stored above ground inside the main

building inside sealed rooms which significantly reduces the risk of spillages entering the environment. The bulk tanks are connected via pipes directly to the diesel generators.

To help prevent accidental release of fuel, bulk tanks are double skinned, located inside adequately sized secondary containment, with leak detection and overflow alarms in place. All fill points are inside the bunds and over drip trays to capture any spills.

Each bulk tank is fitted with an overflow alarm which will signal to the tanker operator to stop further filling. Also fitted is an overflow prevention valve, protecting against over filling of the bulk tank should the overflow alarm float switches fail. Regular visual checks for leaks / spills. Spill kits within close proximity of fuel storage and fill points. Surrounding area covered in good quality hardstanding.

Noise

The generators are provided with acoustic silencers at the air inlets and outlets of the rooms. The rooms will be lined with acoustic absorbent to aid in reducing the internal noise levels. Each generator has an exhaust flue that is ducted to the rooftop and vented 7.4m above the roof level.

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes: "Data Centre FAQ Headline Approach version 11", and "Control and monitor emissions for your environmental permit- leaks from containers" and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Operating techniques for emissions that do not screen out as insignificant

Emissions of NO_x to atmosphere cannot be screened out as insignificant. We have assessed whether the proposed techniques are Best Available Techniques (BAT).

The Environment Agency considers that the default engine specification, as a minimum, for new plant to minimise the impacts of emissions to air (NO_x) is the 2g TA-Luft (or equivalent) standard. The Applicant has confirmed they will be using this standard of engine.

Maintenance and testing is required to be limited to <50 hours per stack. In section 3.7 of the applicant's "Best Available Techniques Assessment" document, they state that each generator will be testing for 30mins monthly and 2-3 hours annually which adds up to a maximum of 9 hours per generator stack. This has been incorporated into the operating techniques table S1.2.

The proposed techniques/ emission levels for emissions that do not screen out as insignificant are in line with the techniques and benchmark levels contained in our “Data Centre FAQ Headline Approach” document and we consider them to represent appropriate techniques for the facility.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting operating limits in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Raw materials

We have specified limits and controls on the use of raw materials and fuels. See key issues section for further details.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included an improvement programme to ensure that:

IC1 –The operator produces an Air Quality Management Plan in conjunction with the Local Authority outlining response measures to be taken in the event of a grid failure. The reason for this is that there are potential air quality impacts for sustained outages, which are highly unlikely but we have required the operator to produce an Air Quality Management Plan for these unlikely scenarios.

IC2 - The operator will submit a monitoring plan for approval by the Environment Agency detailing the operator’s proposal for the implementation of the flue gas monitoring requirements specified in the permit.

Emission Limits

We have decided that emission limits are not required in the permit.

The Environment Agency takes the view that generation plant at a Data Centre used solely for back-up and emergency standby for potential grid outages (and on-site power failures) constitutes an emergency 500 hour plant under EPR/IED and MCPD too. Consequently, no emission limits are required to be set.

We have set permit condition 2.3.5 to limit operating hours to 500, for the installation as a whole i.e. as soon as one generator starts operating the hours count towards the 500 hours.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified. In particular:

We have specified monitoring of emissions of carbon monoxide from emission points EP1 to EP9 (new medium combustion plant), with a minimum frequency of once every 1500 hours of operation or every five years (whichever comes first). This monitoring has been included in the permit in order to comply with the requirements of Medium Combustion Plant Directive, which specifies the minimum requirements for monitoring of carbon monoxide emissions, regardless of the reduced operating hours of the plant.

We have also specified monitoring of emissions of nitrogen oxides from emission points EP1 to EP9 (new medium combustion plant), with the same frequency specified for the monitoring of carbon monoxide emissions. In setting out this requirement, we have applied our regulatory discretion, as we consider that this limited monitoring, to happen in concurrence with the carbon monoxide monitoring, is proportionate to the risk associated with the emissions of NO_x from the installation.

Taking into account the limited hours of operation of the engines operating at the installation, and the fact that we are not setting emission limits for NO_x and carbon monoxide, we consider this monitoring can be carried out in line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 16 February 2021 (formerly known as TGN M5).

We have set an improvement condition (IC2) requesting the operator to submit a monitoring plan for approval by the Environment Agency detailing the operator's proposal for the implementation of the flue gas monitoring requirements specified in the permit.

We have set a requirement for the first monitoring to happen within 4 months of the issue date of the permit or the date when each new medium combustion plant is first put into operation, whichever is later.

Reporting

We have specified reporting in the permit.

We made these decisions in order to comply with the monitoring requirements of Medium Combustion Plant Directive.

Management System

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section:

Response received from UKHSA.

Brief summary of issues raised:

UKHSA have several recommendations. These include:

1. Improved clarity/justification around the parameters/inputs used to describe the worst case scenarios.
2. Designing appropriate ambient air monitoring to verify the NO₂ emission concentrations from the standby generators that have been predicted by the dispersion modelling.
3. The applicant states that an Air Quality Management Plan (AQMP) will be prepared once the site is operational. We would recommend that this is prepared in conjunction with the local authority and the regulator and outlines the response measures to be taken in the event of a National Grid failure.
4. That all plans and environmental management systems are reviewed and updated to reflect this application

Summary of actions taken:

1. We requested clarity on the worst case emergency scenario as the environment agency considers 72 hours a more appropriate worse case, rather than 5 hours. The applicant resubmitted their air dispersion modelling with the 72 hour scenario as scenario 4. There are more diesel engines than needed to supply the power to the data centre, this is normal practice to have built in redundancy to ensure the data centre will be fully supplied with power even if a diesel engine fails to operate. In the unlikely event of a loss of grid power to the data centre only a portion of the diesel generators will operate in order to carry the site load. Consequently, scenario 4 running all 9 generators at 75% for 72 hours is an extremely overly conservative assessment, and considered the worst case.
2. We do not require ambient monitoring to verify modelling predictions, as we do check modelling ourselves. However, improvement condition IC01 has been set in table S1.3 of the permit to require the

operator to produce an Air Quality Management Plan, which may include ambient monitoring if necessary.

3. Improvement condition IC01 has been set in table S1.3 of the permit to require the operator to produce an Air Quality Management Plan in conjunction with the Local Authority.

4. This installation is not yet operational. As such the management system has not yet been developed and implemented. Current plans are to install a management system that will be certified to ISO 14001. Once operational the management system will be subject to compliance inspection by Environment Agency officers.