

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Hoddesdon Energy Limited
Hoddesdon Energy from Waste Plant
Ratty's Lane
Hoddesdon
Hertfordshire
EN11 0RF

Variation application number

EPR/UP3038WA/V003

Permit number

EPR/UP3038WA

Hoddesdon Energy from Waste Plant

Permit number EPR/UP3038WA

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

This variation has been issued to update the permit following a statutory review of the permits in the industry sector for incineration. The opportunity has also been taken to consolidate the original permit and subsequent variations. The Industrial Emissions Directive (IED) came into force on 7th January 2014 with the requirement to implement all relevant Best Available Techniques (BAT) conclusions as described in the Commission Implementing Decision. The BAT conclusions for incineration were published on 03 December 2019 in the Official Journal of the European Union (L323) following a European Union wide review of BAT, implementing decision 2017/2117/EU of 21 November 2017.

The schedules specify the changes made to the permit. Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

Brief description of the process

This permit controls the operation of a waste incineration plant. The relevant listed activity is 5.1 A(1)(b). The permit implements the requirements of the EU Directives on Industrial Emissions and Waste.

The main features of the permit are as follows:

Furnace technology	Gasification
Number of lines	2
Principal waste type	Refuse derived fuel (RDF)
Stack height	40 m
Permitted plant capacity	112,915 tonnes per year
Electrical generation capacity	9.98 MWe

The plant is designed to generate electricity from pre-prepared waste feedstocks using gasification. The feedstock will be refuse derived fuel (RDF). All feedstock arrives on site pre-treated, no further treatment is carried out on site. The expected throughput of the waste plant is between 85,000 – 112,915 tonnes per annum, this variation will be dependent upon the calorific value of the feedstock. The typical calorific value of the waste feedstock is expected to be 15.5 MJ. The operator expects to have no more than 5 days RDF stored on site at any one time. The energy within the RDF will be recovered to generate steam and used to

power a steam turbine with a gross electrical output of 9.98MWe. Electricity from the plant will be exported to the Local Distribution Network.

The plant is comprised of two identical lines (line 1 linked to emission point A1 and line 2 linked to emission point A2), of a staged gasification/combustion unit, firstly the gasification unit produces a syngas and secondly the syngas is combusted. Heat from this process then goes to the heat recovery boiler, raising steam for the turbine and the generation of electricity.

The abatement of pollutants to air is via:

- bag filters for particulate matter
- selective non-catalytic reduction (SNCR) for oxides of nitrogen
- Sorbacal (a type of hydrated lime) dosing for acid gases
- PAC (powdered activated carbon) injection for dioxins and furans

The above techniques are well established and will allow the operator to meet the emission limit values (ELV) specified by this permit and the Industrial Emissions Directive (IED).

Monitoring of all releases will be carried out in line with the BAT conclusions and Chapter IV of the IED.

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

Status log of the permit		
Description	Date	Comments
Application EPR/UP3038WA/A001	Duly made 06/02/2015	Application for 9.98 MW thermal input Power Station.
Additional information received	06/02/2015	
Additional information received	29/06/2015	Schedule 5 response.
Permit determined	01/04/2016	Permit issued to Hoddesdon Energy Ltd.
Application EPR/UP3038WA/V003 (variation and consolidation)	Duly made 08/07/2020	Application to vary and update the permit to modern conditions. To include two emergency vents, to correctly describe surface water drainage arrangements and to review the Fire Prevention Plan.
Additional information received	13/08/2020	Response to Schedule 5 (17/07/2020) providing further information regarding the Fire Prevention Plan, clarification regarding the surface water drainage arrangements and further information in relation to the instances when syngas is vented and safety criteria in place.
Additional information received	23/10/2020 20/11/2020	Response to request for information #2 providing clarification on Schedule 5 questions with regards to the FPP and venting arrangements.
Additional information received	20/11/2020	Response to request for information #3 providing updated procedures for Operation of Syngas Emergency Vents and Surface Water Monitoring and Sampling.
Additional information received	11/01/2021	Response to request for information #4 providing information regarding operational hours in the air dispersion modelling, details regarding venting and number of grid outages.
Variation determined EPR/UP3038WA/V002	02/03/2021	Varied permit issued.

Status log of the permit		
Description	Date	Comments
Regulation 61 notice issued	31/08/2022	Regulation 61 Notice requiring information for Statutory review of permit. BAT Conclusions published 03 December 2019.
Regulation 61 notice response	29/11/2022 and 10/01/2023	
Variation issued EPR/UP3038WA/V003	07/03/2023	

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/UP3038WA

Issued to

Hoddesdon Energy Limited (“the operator”)

whose registered office is

1a Ratty's Lane

Hoddesdon

Hertfordshire

EN11 0RF

company registration number 08955328

to operate a regulated facility at

Hoddesdon Energy from Waste Plant

Ratty's Lane

Hoddesdon

Hertfordshire

EN11 0RF

to the extent set out in the schedules.

The notice shall take effect from 07/03/2023

Name	Date
Principal Permitting Team Leader	07/03/2023

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of an Environment Agency initiated variation.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/UP3038WA

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/UP3038WA/V003 authorising,

Hoddesdon Energy Limited (“the operator”),

whose registered office is

**1a Ratty's Lane
Hoddesdon
Hertfordshire
EN11 0RF**

company registration number 08955328

to operate an installation at

**Hoddesdon Energy from Waste Plant
Ratty's Lane
Hoddesdon
Hertfordshire
EN11 0RF**

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

Name	Date
Principal Permitting Team Leader	07/03/2023

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
 - (c) referenced in schedule 1, table S1.1 (AR1), from 03/12/2023, in accordance with a written other than normal operating conditions (OTNOC) management plan.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 The operator shall review the written management system at least every 3 years or otherwise as requested by the Environment Agency.
- 1.1.4 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

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

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

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;

- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

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

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

2 Operations

2.1 Permitted activities

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

2.2 The site

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

2.3 Operating techniques

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

- 2.3.4 Waste shall only be accepted if:
- (a) it is of a type and quantity listed in schedule 2 table S2.2; and
 - (b) it conforms to the description in the documentation supplied by the producer or holder.
- 2.3.5 Waste paper, metal, plastic or glass that has been separately collected for the purpose of preparing for re-use or recycling shall not be accepted. Waste from the treatment of these separately collected wastes shall only be accepted if incineration delivers the best environmental outcome in accordance with regulation 12 of the Waste (England and Wales) Regulations 2011.
- 2.3.6 Separately collected fractions other than those listed in condition 2.3.5 shall not be accepted unless they are unsuitable for recovery by recycling.
- 2.3.7 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.8 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.
- 2.3.9 Waste shall not be charged if:
- (a) the combustion chamber temperature is below 850 °C,
 - (b) any continuous emission limit value in schedule 3 table S3.1(a) is exceeded during abnormal operation; or
 - (c) any continuous emission limit value in schedule 3 table S3.1 is exceeded, other than during abnormal operation; or
 - (d) continuous emission monitors to demonstrate compliance with any continuous emission limit value in schedule 3 table S3.1 are unavailable other than during abnormal operation; or
 - (e) there is a stoppage, disturbance or failure of the activated carbon abatement system, other than during abnormal operation.
 - (f) continuous emission monitors to demonstrate compliance with the emission limit values for particulates, TOC or CO in schedule 3 are unavailable unless alternative techniques, as agreed in writing with the Environment Agency, are used to demonstrate compliance with those emission limit values.
- 2.3.10 The operator shall record the beginning and end of each period of “abnormal operation”.
- 2.3.11 During a period of “abnormal operation”, the operator shall restore normal operation of the failed equipment or replace the failed equipment as soon as possible.
- 2.3.12 The operator shall interpret the start of the period of “abnormal operation” as the earliest of the following:
- (a) a technically unavoidable stoppage, disturbance, or failure of continuous emission monitors.
 - (b) a technically unavoidable stoppage, disturbance, or failure of the activated carbon abatement system
 - (c) Any other technically unavoidable stoppage, disturbance, or failure of the plant which is causing or could lead to an exceedance of an emission limit value in table S3.1.

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

- (a) when the failed equipment is repaired and brought back into normal operation;
- (b) when the operator initiates a shut down of the waste combustion activity, as described in the application or as agreed in writing with the Environment Agency;
- (c) The failed equipment has not been repaired and brought back into normal operation and a single period of abnormal operation reaches a duration of 4 hours after the start of abnormal operation on an incineration line
- (d) Abnormal operation occurs on an incineration line and the cumulative duration of abnormal operation periods over 1 calendar year has reached 60 hours on that incineration line;

2.3.14 The operator shall have at least one auxiliary burner in each line which shall be operated at start up, shut down and as required during operation to ensure that the operating temperature specified in condition 2.3.9 is maintained as long as incompletely burned waste is present in the combustion chamber. Unless the temperature specified in condition 2.3.9 is maintained in the combustion chamber, such burner(s) shall be fed only with fuels which result in emissions no higher than those arising from the use of gas oil, liquefied gas or natural gas.

2.3.15 Bottom ash and APC residues shall not be mixed.

2.4 Improvement programme

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

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

2.5 Pre-operational conditions

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

3 Emissions and monitoring

3.1 Emissions to water, air or land

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

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

3.1.3 Wastes produced at the site shall, as a minimum, be sampled and analysed in accordance with schedule 3 table S3.5. Additional samples shall be taken and tested and appropriate action taken, whenever:

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

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

3.2.1 The limits for emissions to air apply as follows:

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

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

(a) the values of the 95% confidence intervals of a single measured result at the daily emission limit value shall not exceed the following percentages of the emission limit values:

• Carbon monoxide	10%
• Sulphur dioxide	20%
• Oxides of nitrogen (NO & NO ₂ expressed as NO ₂)	20%
• Particulate matter	30%
• Total organic carbon (TOC)	30%
• Hydrogen chloride	40%
• Ammonia	40%

(b) valid half-hourly average values or 10-minute averages shall be determined within the effective operating time (excluding the start-up and shut-down periods) from the measured values after having subtracted the value of the confidence intervals in condition 3.2.2 (a).

(c) where it is necessary to calibrate or maintain the monitor and this means that data are not available for a complete half-hour or 10 minute period, the half-hourly average or 10-minute average shall in any case be considered valid if measurements are available for a minimum of 20 minutes or 7 minutes during the half-hour or 10-minute period respectively. The number of half-hourly or 10-minute averages so validated shall not exceed 5 or 15 respectively per day;

(d) daily average values shall be calculated as follows:

- the average of valid half hourly averages or 10 minute averages over a calendar day excluding half hourly averages or 10 minute averages during periods of abnormal operation. The daily average value shall be considered valid if no more than five half-hourly average or fifteen 10-minute average values in any day have been determined not to be valid;

(e) no more than ten daily average values per year shall be determined not to be valid.

3.3 Emissions of substances not controlled by emission limits

3.3.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.

3.3.2 The operator shall:

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

3.4 Odour

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

3.5 Noise and vibration

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

3.6 Monitoring

- 3.6.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1, S3.1(a), S3.2 and S3.3;
 - (b) process monitoring specified in table S3.4;

(c) residue quality in table S3.5.

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

3.7 Pests

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

3.8 Fire prevention

- 3.8.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

- (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

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

4.2 Reporting

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

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

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

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

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

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

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

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately:
 - (i) inform the Environment Agency,

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

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

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

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

Where the operator is a registered company:

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

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

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

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	S5.1 A1 (b)	The incineration of non-hazardous waste in a waste incineration plant with a capacity of 3 tonnes per hour or more.	From receipt of waste to emission of exhaust gas and removal from site of waste arising. Waste types and quantities as specified in Table S2.2 of this permit. Maximum storage quantity of 3,380 tonnes
Directly Associated Activities			
AR2	Electricity Generation	Generation of 9.98 MWe electrical power using a steam turbine from energy recovered from the flue gases.	
AR3	Back up electrical generator	For providing emergency electrical power to the plant in the event of supply interruption.	Emergency use to a maximum of 500 hours operation per year. Maximum of 50 hours testing per year.
AR4	-	Firewater pump	For providing emergency fire water in the event of a fire and plant supply interruption.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	Responses to Part B and Appendix 6 of the application form and referenced supporting documents.	Duly Made 06/02/2015
Additional information dated 29/01/2015	All of response	06/02/2015, 06/05/2015
Response to Schedule 5 Notice dated 14/05/2015	All of document including Air Quality Assessment Revision 5, Human Health Risk Assessment July 2015, plus emails with follow up information.	29/06/2015, 27/07/2015, 22/09/2015
Additional information dated 10/07/2015	All of the email	10/07/2015
Additional information dated 05/08/2015	All of the email	02/09/2015
Additional information dated 28/08/2015	All of document plus follow up emails	15/10/2015, 13/11/2015
Application	Response to Parts C2 and C3 of the application forms and all referenced supporting information. Including:	Duly made 08/07/2020

Table S1.2 Operating techniques		
Description	Parts	Date Received
	- Hoddesdon ATT Drainage Plan – Aug 2018 (submitted 03/07/20) - Variation Supporting documents – SOL1911HE01	
Response to Schedule 5 Notice dated 17/07/2020	Response to Schedule 5 providing further information clarifying the surface water drainage arrangements and further information in relation to the instances when syngas is vented and the safety criteria in place.	13/08/2020
Additional information received	Response to request for information providing clarification on Schedule 5 questions with regards to the FPP and venting arrangements. - Updated version of the Fire Prevention Plan-SOL1907HE01	23/10/2020 20/11/2020
Additional information received	Response to request for information providing updated procedures. - Operation of Syngas Emergency Vents HATT-SOP-OPS-050. - Surface Water Monitoring and Sampling HATT-SOP-OPS-057.	20/11/2020
Additional information received	Response to request for information providing information regarding operational hours in the air dispersion modelling, details regarding venting and number of grid outages.	11/01/2021
Response to regulation 61 notice	Operating techniques as set out in the response to the regulation 61 notice.	29/11/22 and 10/01/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The operator shall submit a written report to the Environment Agency on the implementation of its Environment Management System and the progress made in the certification of the system by an external body or if appropriate submit a schedule by which the EMA will be certified.	Received
IC2	The operator shall submit a written proposal to the Environment Agency to carry out tests to determine the size distribution of the particulate matter in the exhaust gas emissions to air from emission point A1, identifying the fractions within the PM ₁₀ and PM _{2.5} ranges. The proposals shall include a timetable for approval by the Environment Agency to carry out such tests and produce a report on the results. On receipt of written agreement by the Environment Agency to the proposal and the timetable, the operator shall carry out the tests and submit to the Environment Agency a report on the results.	Received

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC3	The operator shall submit a written report to the Environment Agency on the commissioning of the installation. The report shall summarise the environmental performance of the plant as installed against the design parameters set out in the Application. The report shall also include a review of the performance of the facility against the conditions of this permit and details of procedures developed during commissioning for achieving and demonstrating compliance with permit conditions.	Received
IC4	The operator shall carry out checks to verify the residence time, minimum temperature oxygen content of the exhaust gases in the furnace whilst operating under the anticipated most unfavourable operating conditions. The results shall be submitted in writing to the Environment Agency.	31/07/2021 or otherwise as agreed in writing with the Environment Agency
IC5	The operator shall submit a written report to the Environment Agency describing the performance and optimisation of the Selective Non Catalytic Reduction (SNCR) system and combustion settings to minimise oxides of nitrogen (NO _x) emissions within the emission limit values described in this permit with the minimisation of nitrous oxide emissions. The report shall include as assessment of the level of NO _x and N ₂ O emissions that can be achieved under optimum operating conditions. The report shall also provide details of the optimisation (including dosing rates) for the control of acid gases and dioxins.	Received
IC6	The operator shall carry out an assessment of the impact of emissions to air of the following component metals subject to emission limit values: As and Cr. A report on the assessment shall be made to the Environment Agency. Emissions monitoring data obtained during the first year of operation shall be used to compare the actual emission with those assumed in the impact assessment submitted with the Application. An assessment shall be made of the impact of each metal against the relevant EQS/EAL. In the event that the assessment shows that an EQS/EAL can be exceeded, the report shall include proposals for further investigative work.	31/07/2021 or otherwise as agreed in writing with the Environment Agency
IC7	The Operator shall submit a written summary report to the Environment Agency to confirm that the performance of Continuous Emission Monitors for parameters as specified in Table S3.1 and Table S3.1(a) complies with the requirements of BS EN 14181, specifically the requirements of QAL1, QAL2 and QAL3. The report shall include the results of calibration and verification testing,	Initial calibration report to be submitted to the Agency within 3 months of completion of recommissioning Full summary evidence compliance report to be submitted within 18 months of completion of recommissioning

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC8	<p>Following the use of the emergency vents (emission points A3 and A4) that the Environment Agency are notified of in accordance with permit condition 4.3.1, the operator shall submit a report to the Environment Agency comparing the venting scenarios as described in the application against an actual event. The report shall include but is not limited to consideration of:</p> <ul style="list-style-type: none"> • The trigger for the use of the emergency vents. • Length of time the event occurred. • Assess the concentration of syngas released. • Explore opportunities to minimise/avoid the amount of syngas produced and released. • Describe how safety procedures were followed and highlight any issues that arose. • Compare and contrast the actual event with what was detailed in the application. • Based on your report set out any necessary changes to your procedures and if required upgrades/replacement of plant equipment. Set out the timescales for the delivery of these changes. <p>The operator shall submit the report in writing to the Environment Agency for approval. Any agreed proposals shall be implemented by the operator in line with the timescales agreed by the Environment Agency.</p>	Submission within 3 months of the emergency vents being used.
IC9	<p>The operator shall produce a review of options to prevent the exceedance of the 1 hour benzene EAL when using the emergency vents (emission points A3 and A4). This shall include but is not limited to:</p> <ul style="list-style-type: none"> • A feasibility study including a cost benefit analysis for potential upgrades or other changes to infrastructure or operational regimes on the site that could reduce emissions. The study should include consideration of any restrictions stipulated in the sites approved planning permission and planning conditions; • use of the above information to propose appropriate changes to stack height and/or stack orientation and/or any other potential options for minimising emissions or maximising dispersion, to ensure that emergency venting does not exceed acceptable maximum emissions levels specified in the relevant guidance (Environment agency web guidance '<i>Air emissions risk assessment for your environment permit</i>') at all sensitive receptors; • submission of a proposed timetable for the implementation of the proposed measure/s; • submission of revised air dispersion modelling to demonstrate that the proposed measures will not result in an exceedance of the 1 hour benzene EAL and all other relevant emissions standards for 1,3 butadiene and toluene. <p>The operator shall submit the review in writing to the Environment Agency for approval. Any agreed proposals shall be implemented by the operator in line with the timescales agreed by the Environment Agency.</p>	02/09/2021 or otherwise as agreed in writing with the Environment Agency

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC10	Submit a revised Fire Prevention Plan that includes a detailed site plan to the Environment Agency for approval. The site plan must be drawn to scale. It should include all of the following features: the layout of the buildings on the installation, the location of hazardous materials, access points, location of hydrants and water supplies, indicate where natural and unmade ground is, show fixed and mobile plant, show drainage arrangements, indicate how polluted surface water is managed, show how firewater is contained, show storage areas and fires walls, indicate the location of any waste quarantine areas, indicate the location of the nearest sensitive receptors (on a separate drawing if necessary), include a compass rose and show the direction of the prevailing wind.	02/09/2021 or otherwise as agreed in writing with the Environment Agency
IC11	<p>The operator shall perform a study to determine the extent to which the operation of the current systems in place at the plant to minimise NOx emissions can be further optimised such that emissions are reduced as far as possible below 180 mg/Nm³ as a daily average, without significantly increasing emissions of other pollutants or having a significant negative effect on plant operation, reliability or bottom ash quality. The study shall be based on the results of trials carried out at the installation and shall have regard to the recommendations for test conditions set out in Section 5.4.3 of report titled 'Establishing factors that influence NOx reduction at waste incineration plant to levels below the upper end of the BAT-AELs' (dated 14/01/2022), or other methodology agreed in writing with the Environment Agency. A written report of the study shall be submitted to the Environment Agency which shall include but not necessarily be limited to the following:</p> <ul style="list-style-type: none"> • A brief description of the currently installed measures at the installation to minimise NOx emissions, including details of how the reagent dosing system responds to emissions monitoring data and historic data which illustrates the current achievable level of daily NOx emissions. • The results of trials conducted to further reduce daily average NOx emissions using currently installed measures, including: <ul style="list-style-type: none"> ○ a description of the parameters that were varied during the trial e.g. ammonia or urea feed rates, physical form of urea injected, air flows, and the range over which they were varied ○ the levels of NOx achieved and associated levels of ammonia and nitrous oxide emissions and reagent consumption ○ observed effects and predicted long-term impacts on plant operation, reliability and maintenance regime ○ any changes to the composition of the bottom ash and boiler ash and the implications of those changes for the ability to process and use the ash, as well as for the pollution potential of the ash both during processing and its subsequent use as a secondary aggregate ○ any other relevant cross-media effects 	12 months from completion of recommissioning

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	The report shall also include a description of the extent to which current systems in place at the plant to minimise NOx emissions can be optimised on a permanent basis, including justification and an implementation plan where relevant.	
IC12	The operator shall submit a report to the Environment Agency on whether waste feed to the plant can be proven to have a low and stable mercury content. The report shall have regard to BAT 4 of the BAT conclusions, be based on historic mercury emissions monitoring data and have regard to the Environment Agency Mercury Monitoring Protocol.	12 months from completion of recommissioning
IC13	The operator shall submit a report to the Environment Agency on whether dioxin emissions to air are stable. The report shall have regard to BAT 4 of the BAT conclusions, be based on historic dioxin emissions monitoring data and have regard to the Environment Agency Dioxins Monitoring Protocol.	12 months from completion of recommissioning
IC14	<p>The operator shall calculate the gross electrical efficiency using the method set out in the general considerations section of the BAT conclusions and submit details of the calculation to the Environment Agency. The calculation shall use the R1 efficiency status, boiler efficiency determination guidance (or other methodology as agreed in writing with the Environment Agency) to calculate boiler efficiency which can then be used to calculate Qth.</p> <p>Where the calculated gross electrical efficiency is below the range specified in BAT 20 of the BAT conclusions, the operator shall carry out an assessment of the opportunities to increase the energy efficiency of the installation.</p> <p>The assessment shall include but not necessarily be limited to:</p> <ul style="list-style-type: none"> • Improvements that could be made to the furnace (including control systems) in order to increase the amount of thermal energy produced per unit of thermal energy in the waste. • Where relevant, improvements that could be made to the steam system and related components to allow a greater quantity of electricity to be generated per unit of thermal energy in the steam. • Improvements in the heat and electrical efficiency of the plant's ancillary systems that could be made in order to reduce the heat and electrical loads of the plant. • Where relevant, an implementation plan for the improvements identified, including the anticipated increase in the gross and/or net electrical efficiency of the plant which would be achieved. <p>A written copy of the assessment shall be submitted to the Environment Agency.</p>	12 months from completion of recommissioning

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
PO1	Prior to the commencement of commissioning, the operator shall send a summary of the site Environment Management System (EMS) to the Environment Agency and make available for inspection all documents and procedures which form part of the EMS. The EMS shall be developed in line with the requirements set out in Section 1 of How to comply with your environmental permit- Getting the basics right. The documents and procedures set out in the EMS shall form the written management system referenced in condition 1.1.1 (a) of the permit.
PO2	Prior to the commencement of commissioning, the operator shall send a report to the Environment Agency which will contain a comprehensive review of options available for utilising the heat generated by the waste incineration process in order to ensure that it is recovered as far as practicable. The review shall detail any identified proposals for improving the recovery and utilisation of waste heat and shall provide a timetable for their implementation.
PO3	Prior to the commencement of commissioning, the operator shall submit to the Environment Agency for approval a protocol for the sampling and testing of incinerator bottom ash, char and or liquor for the purposes of assessing its hazard status. Sampling and testing shall be carried out in accordance with the protocol as approved.
PO4	Prior to the commencement of commissioning; the operator shall provide a written commissioning plan, including timelines for completion, for approval by the Environment Agency. The commissioning plan shall include the expected emissions to the environment during the different stages of commissioning, the expected durations of commissioning activities and the actions to be taken to protect the environment and report to the Environment Agency in the event that actual emissions exceed expected emissions. Commissioning shall be carried out in accordance with the commissioning plan as approved.
PO5	<p>Prior to the commencement of commissioning, the operator shall submit a written report to the Agency detailing the waste acceptance procedures to be used at the site. The waste acceptance procedure shall include the process and systems by which wastes unsuitable for incineration at the site will be controlled.</p> <p>The procedure shall be implemented in accordance with the written approval from the Agency.</p>
PO6	After completion of furnace design and at least three calendar months before any furnace operation; the operator shall submit a written report to the Agency of the details of the computational fluid dynamic (CFD) modelling. The report shall demonstrate whether the design combustion conditions comply with the residence time and temperature requirements as designed by Chapter IV and Annex VI of the IED.
PO7	Prior to the commencement of commissioning, the operator shall submit a report on the baseline conditions of soil and groundwater at the installation. The report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided in Article 22(3) of the IED. The report shall contain information, supplementary to that already provide in application Site Condition Report, needed to meet the information requirements of Article 122(2) of the IED.
PO8	The operator shall submit the written protocol referenced in condition 3.2.4 for the monitoring of soil and groundwater for approval by the Environment Agency. The

Table S1.4 Pre-operational measures	
Reference	Pre-operational measures
	<p>protocol shall demonstrate how the operator will meet the requirements of Articles 14(1)(b), 14(1)€ and 16(2) of the IED.</p> <p>The procedure shall be implemented in accordance with the written approval from the Agency.</p>
PO9	<p>At least three months before operation, the operator shall submit a written report to the Environment Agency specifying arrangements for continuous and periodic monitoring of emissions to air to comply with Environment Agency guidance notes M1 and M2.</p> <p>The report shall include the following:</p> <ul style="list-style-type: none"> • Plant and equipment details, including accreditation to MCERTS • Methods and standards for sampling and analysis • Details of monitoring locations, access and working platforms

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
RDF	As detailed in the document SOL1409HE01 Section 3.5 Raw Materials, Table 3.2, submitted with application EPR/UP3038WA/A001

Table S2.2 Permitted waste types and quantities for incineration (gasification) plant	
Maximum quantity	112,915 tonnes per year
Waste code	Description
19	Wastes from Waste Management Facilities, Off-site Waste Water Treatment Plants and the Preparation of Water Intended for Human Consumption and Water for Industrial Use
19 02	Wastes from physico/chemical treatments of waste (including dechromatation, decyanidation, neutralisation)
19 02 10	Combustible wastes other than those mentioned in 19 02 02 and 19 02 09
19 12	Wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified
19 12 10	combustible waste (refuse derived fuel)

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1, A2 (shown on site plan in schedule 7)	Particulate matter	Gasification plant combustion exhaust gases	30 mg/m ³	½-hr average	Continuous	EN 14181
	Particulate matter		10 mg/m ³ Until 02/12/2023	daily average	Continuous	EN 14181
			5 mg/m ³ from 03/12/2023			
	Total Organic Carbon (TOC)		20 mg/m ³	½-hr average	Continuous	EN 14181
	Total Organic Carbon (TOC)		10 mg/m ³	daily average	Continuous	EN 14181
	Hydrogen chloride		60 mg/m ³	½-hr average	Continuous	EN 14181
	Hydrogen chloride		10 mg/m ³ Until 02/12/2023	daily average	Continuous	EN 14181
			8 mg/m ³ from 03/12/2023			

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.

Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1, A2 (shown on site plan in schedule 7)	Hydrogen fluoride	Gasification plant combustion exhaust gases	2 mg/m ³ until 02/12/2023	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year of operation then Bi-annually	CEN TS 17340
			1 mg/m ³ from 03/12/2023			
	Carbon monoxide		100 mg/m ³	½-hr average	Continuous	EN 14181
	Carbon monoxide		50 mg/m ³	daily average	Continuous	EN 14181
	Sulphur dioxide		200 mg/m ³	½-hr average	Continuous	EN 14181
	Sulphur dioxide		50 mg/m ³ Until 02/12/2023	daily average	Continuous	EN 14181
			40 mg/m ³ from 03/12/2023			
	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)		400 mg/m ³	½-hr average	Continuous	EN 14181
	Oxides of nitrogen (NO and NO ₂ expressed as NO ₂)		200 mg/m ³ Until 02/12/2023	daily average	Continuous	EN 14181
			180 mg/m ³ from 03/12/2023			
Cadmium & thallium and their compounds (total)		0.05 until 02/12/2023	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year of operation then bi-annually	BS EN 14385	
		0.02 mg/m ³ from 03/12/2023				

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1, A2 (shown on site plan in schedule 7)	Mercury and its compounds	Gasification plant combustion exhaust gases	0.05 mg/m ³ until 02/12/2023	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year then bi-annually until 02/12/2023	BS EN 13211
	Mercury and its compounds		0.02 mg/m ³ from 03/12/2023	Average of three consecutive measurements of at least 30 minutes each	Quarterly in first year of operation then bi-annually from 03/12/2023	BS EN 13211
			Limit does not apply if continuous monitoring has been specified by the Environment Agency		Not required if continuous monitoring has been specified by the Environment Agency	
	Mercury and its compounds		0.02 mg/m ³ from 03/12/2023	Daily average	Continuous from 03/12/2023 Not required unless continuous monitoring has been specified by the Environment Agency in line with sampling protocol	EN 14181
	Sb, As, Pb, Cr, Co, Cu, Mn, Ni and V and their compounds (total)		0.5 mg/m ³ Until 02/12/2023	Average of three consecutive measurements of at least 30 minutes each	0.3 mg/m ³ from 03/12/2023	Quarterly in first year of operation then bi-annually

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1, A2 (shown on site plan in schedule 7)	Exhaust gas temperature	Gasification plant combustion exhaust gases	No limit set	-	Continuous	Traceable to national standards
	Exhaust gas pressure		No limit set	-	Continuous	Traceable to national standards
	Exhaust gas flow		No limit set	-	Continuous	BS EN 16911-2
	Exhaust gas oxygen content		No limit set	-	Continuous	EN 14181
	Exhaust gas water vapour content		No limit set	-	Continuous	EN 14181
	Ammonia (NH ₃)		10 mg/m ³	Daily average	Continuous	EN 14181
	Nitrous oxide (N ₂ O)		No limit set	½-hr average and daily average from 01/01/2023	Continuous	EN 14181
	Carbon dioxide		No limit set	Continuous	Continuous	EN 14181

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1, A2 (shown on site plan in schedule 7)	Dioxins / furans (I-TEQ)	Gasification plant combustion exhaust gases	0.1 ng/m ³ Until 02/12/2023	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year of operation then bi-annually until 02/12/2023	BS EN 1948 Parts 1, 2 and 3
	Dioxins / furans (I-TEQ)		0.06 ng/m ³ from 03/12/2023	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year of operation then bi-annually from 03/12/2023	EN 1948 Parts 1, 2 and 3
			and 0.08 ng/m ³ if long term limit is specified by the Environment Agency in line with sampling protocol from 03/12/2023	and value over sampling period of 2 to 4 weeks for long term sampling	and long term sampling if specified by the Environment Agency in line with sampling protocol from 03/12/2023	and CEN TS 1948-5 if specified by the Environment Agency in line with sampling protocol
	Dioxin-like PCBs (WHO-TEQ Humans / Mammals, Fish, Birds)		No limit set	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year of operation then bi-annually	EN 1948 Parts 1, 2 and 4

Table S3.1 Point source emissions to air – emission limits and monitoring requirements.						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard(s) or method(s)
A1, A2 (shown on site plan in schedule 7)	Dioxins / furans (WHO-TEQ Humans / Mammals, Fish, Birds)	Gasification plant combustion exhaust gases	No limit set	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year of operation then bi-annually	BS EN 1948 Parts 1, 2 and 3
	Polybrominated dibenzodioxins and furans		No limit set	periodic over minimum 6 hours, maximum 8 hour period	Quarterly in first year of operation then bi-annually	Method based on procedural requirements of EN 1948
	Specific individual polycyclic aromatic hydrocarbons (PAHs), as specified in Schedule 6.		No limit set	periodic over minimum 6 hours, maximum 8 hour period	Annually	BS ISO 11338 Parts 1 and 2.
A3, A4 (as shown on site plan in schedule 7)	Raw syngas	Emergency Vents from gasifier	-	-	-	-
A5 (as shown on site plan received on 03/03/23)	Carbon monoxide	Back-up electrical generator	No limit set	In line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 16 February 2021 (formerly known as TGN M5)	Every 1500 hours of operation or once every five years (whichever comes first) from 01/01/2030	In line with web guide 'Monitoring stack emissions: low risk MCPs and specified generators' Published 16 February 2021 (formerly known as TGN M5)

Table S3.1(a) Point source emissions to air during abnormal operation of incineration plant – emission limits and monitoring requirements						
Emission point ref. & location	Parameter	Source	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1, A2 (shown on site plan in schedule 7)	Particulate matter	Gasification plant combustion exhaust gases	150 mg/m ³	½-hr average	Continuous	EN 14181 or alternative surrogate as agreed in writing with the environment agency during failure of the continuous emission monitor
	Total Organic Carbon (TOC)		20 mg/m ³	½-hr average	Continuous	
	Carbon monoxide		100 mg/m ³	½-hr average	Continuous	

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 on site plan in schedule 7. Discharge arrangements shown on 'Hoddesdon ATT Drainage Plan' submitted 08/07/20 with application EPR/UP3038WA/V002	Uncontaminated surface water: <ul style="list-style-type: none"> • western area of site via interceptor and then attenuation pond • eastern area of site not via attenuation pond (no interceptor, suitable alternative measures as per table S1.2) 	Oil and grease	None visible	-	-	-

Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 (shown on site plan in schedule 7)	Water treatment plant permeate, cooling waters and boiler blowdown	No parameters set	No limits set	-	-	-

Table S3.4 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
As identified in the Application	Wind Speed and Direction	Continuous	Anemometer	
Location close to the Combustion Chamber inner wall or as identified and justified in Application.	Temperature (° C)	Continuous	Traceable to national standards	As agreed in writing with the Agency.
Incineration plant	Gross electrical efficiency	within 6 months of any modification that	Performance test at full load or other method as	

Table S3.4 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
		significantly affects energy efficiency	agreed in writing with the Environment Agency	

Table S3.5 Residue quality					
Emission point reference or source or description of point of measurement	Parameter	Limit	Monitoring frequency	Monitoring standard or method *	Other specifications
Bottom Ash	TOC or otherwise as agreed in writing with the Environment Agency	3% or otherwise as agreed in writing with the Environment Agency	Monthly in the first year of operation then quarterly	EN 14899 and either EN 13137 or EN 15936 or otherwise as agreed in writing with the Environment Agency	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'
Bottom Ash	Metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs.		Monthly in the first year of operation then quarterly	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	
Bottom Ash	Total soluble fraction and metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions		Before use of a new disposal or recycling route	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	
APC Residues	Metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs.		Monthly in the first year of operation then quarterly	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	

Table S3.5 Residue quality					
Emission point reference or source or description of point of measurement	Parameter	Limit	Monitoring frequency	Monitoring standard or method *	Other specifications
APC Residues	Total soluble fraction and metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions		Before use of a new disposal or recycling route	Environment Agency Guidance, 'TGN M4 – Guidelines for Ash Sampling and Analysis'	

* Or other equivalent standard as agreed in writing with the Environment Agency.

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.6.1.	A1, A2	Quarterly	1 Jan, 1 Apr, 1 Jul and 1 Oct
TOC or otherwise as agreed in writing with the Environment Agency Parameters as required by condition 3.6.1	Bottom Ash	Quarterly (but monthly for the first year of operation)	1 Jan, 1 Apr, 1 Jul and 1 Oct
Metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs Parameters as required by condition 3.6.1	Bottom Ash	Quarterly (but monthly for the first year of operation)	1 Jan, 1 Apr, 1 Jul and 1 Oct
Total soluble fraction and metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions Parameters as required by condition 3.6.1	Bottom Ash	Before use of a new disposal or recycling route	
Metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) and their compounds, dioxins/furans and dioxin-like PCBs Parameters as required by condition 3.6.1	APC Residues	Quarterly (but monthly for the first year of operation)	1 Jan, 1 Apr, 1 Jul and 1 Oct
Total soluble fraction and metals (Antimony, Cadmium, Thallium, Mercury, Lead, Chromium, Copper, Manganese, Nickel, Arsenic, Cobalt, Vanadium, Zinc) soluble fractions Parameters as required by condition 3.6.1	APC Residues	Before use of a new disposal or recycling route	

Table S4.2: Annual production/treatment	
Parameter	Units
Total waste incinerated	tonnes
Electrical energy produced	kWh
Thermal energy produced e.g. steam for export	kWh
Electrical energy exported	kWh
Electrical energy used on installation	kWh
Waste heat utilised by the installation	kWh

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Annual Report as required by condition 4.2.2	Annually	-
Electrical energy exported, imported and used at the installation	Annually	kWh / tonne of waste incinerated
Natural gas consumption	Annually	kg / tonne of waste incinerated
Bottom Ash residue	Annually	Route, tonnes and tonnes / tonne of waste incinerated
APC residue	Annually	Route, tonnes and tonnes / tonne of waste incinerated
Urea consumption	Annually	kg / tonne of waste incinerated
Activated Carbon consumption	Annually	kg / tonne of waste incinerated
Lime consumption	Annually	kg / tonne of waste incinerated
Water consumption	Annually	kg / tonne of waste incinerated
Periods of abnormal operation	Annually	No of occasions and cumulative hours for current calendar year for each line.
Use of Emergency Vents A3 and and/or A4	Annually	No. of occasions and cumulative hours for current calendar year for the installation

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Annual report required by condition 4.2.2	Annual performance report template	-
Emissions to air until 02/12/2023	Forms air 1-9 or other forms as agreed in writing by the Environment Agency	26/02/21
Emissions to air from 03/12/2023	Forms air 1-9 or other forms as agreed in writing by the Environment Agency	07/03/23
Residue quality	Form residue 1 and 2 or other form as agreed in writing by the Environment Agency	07/03/23

Schedule 5 – Notification

These pages outline the information that the operator must provide.

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

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

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

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

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

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

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

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

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

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

“abnormal operation” means: any technically unavoidable stoppages, disturbances, or failures of the plant or the measurement devices. Abnormal operation starts as defined in condition 2.3.12 and ends as defined in condition 2.3.13. Abnormal operation is limited to 4 hours for a single occurrence and a total of 60 hours per year per line.

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

“APC residues” means air pollution control residues

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

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

“BAT conclusions” means Commission Implementing Decision (EU) 2019/2010 of 12 November 2019 establishing the best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for Waste Incineration

“bottom ash” means ash falling through the grate

“CEM” Continuous emission monitor

“CEN” means Comité Européen de Normalisation

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

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

Daily average emissions value means ‘the average of at least 43 valid half hourly averages or for CO the average of at least 43 valid half hourly averages or 129 valid 10 min averages’

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

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

“emissions to land” includes emissions to groundwater.

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

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

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

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive

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

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“ISO” means International Standards Organisation.

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

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

"MCERTS" means the Environment Agency's Monitoring Certification Scheme.

"PAH" means Poly-cyclic aromatic hydrocarbon, and comprises Anthanthrene, Benzo[a]anthracene, Benzo[b]fluoranthene, Benzo[k]fluoranthene, Benzo[b]naph(2,1-d)thiophene, Benzo[c]phenanthrene, Benzo[ghi]perylene, Benzo[a]pyrene, Cholanthrene, Chrysene, Cyclopenta[c,d]pyrene, Dibenz[ah]anthracene, Dibenz[a,i]pyrene Fluoranthene, Indo[1,2,3-cd]pyrene, Naphthalene

"PCB" means Polychlorinated Biphenyl. Dioxin-like PCBs are the non-ortho and mono-ortho PCBs listed in the table below.

"Pests" means Birds, Vermin and Insects.

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

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

"start up" is any period, where the plant has been non-operational, until waste has been fed to the plant in a sufficient quantity to initiate steady-state conditions as described in the application or as agreed in writing with the Environment Agency.

"shut down" is any period where the plant is being returned to a non-operational state as described in the application or as agreed in writing with the Environment Agency.

"TOC" means Total Organic Carbon. In respect of releases to air, this means the gaseous and vaporous organic substances, expressed as TOC. In respect of Bottom Ash, this means the total carbon content of all organic species present in the ash (excluding carbon in elemental form).

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

"Waste Framework Directive" or "WFD" means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste

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

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

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

For dioxins/furans and dioxin-like PCBs the determination of the toxic equivalence concentration (I-TEQ, & WHO-TEQ for dioxins/furans, WHO-TEQ for dioxin-like PCBs) stated as a release limit and/ or reporting requirement, the mass concentrations of the following congeners have to be multiplied with their respective toxic equivalence factors before summing. When reporting on measurements of dioxins/furans and dioxin-like PCBs, the toxic equivalence concentrations should be reported as a range based on: all congeners less than the detection limit assumed to be zero as a minimum, and all congeners less than the detection limit assumed to be at the detection limit as a maximum. However the minimum value should be used when assessing compliance with the emission limit value in table S3.1.

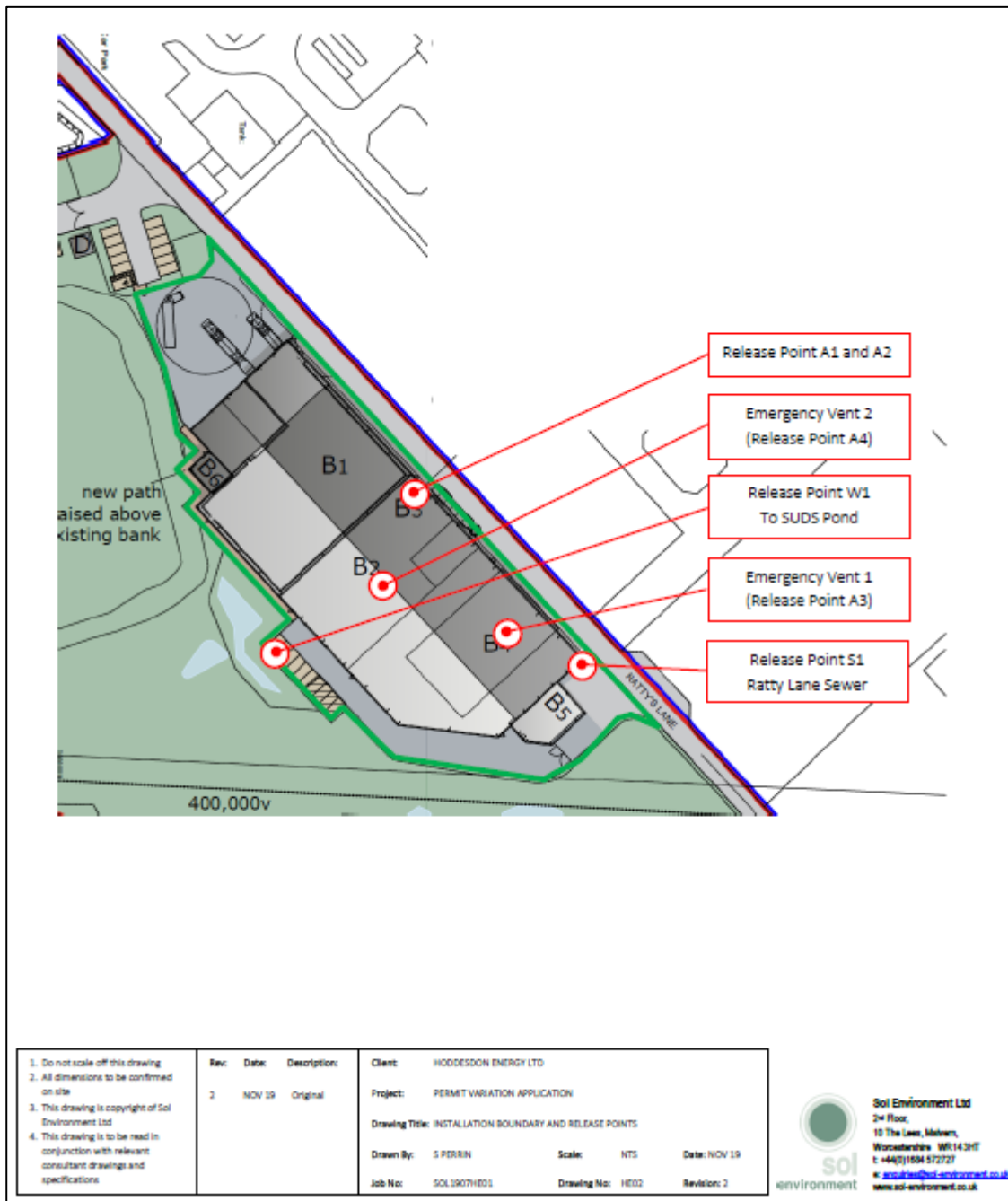
TEF schemes for dioxins and furans				
Congener	I-TEF	WHO-TEF		
	1990	2005	1997/8	
		Humans / Mammals	Fish	Birds
Dioxins				
2,3,7,8-TCDD	1	1	1	1
1,2,3,7,8-PeCDD	0.5	1	1	1
1,2,3,4,7,8-HxCDD	0.1	0.1	0.5	0.05
1,2,3,6,7,8-HxCDD	0.1	0.1	0.01	0.01
1,2,3,7,8,9-HxCDD	0.1	0.1	0.01	0.1
1,2,3,4,6,7,8-HpCDD	0.01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

TEF schemes for dioxin-like PCBs			
Congener	WHO-TEF		
	2005	1997/8	
	Humans / mammals	Fish	Birds
Non-ortho PCBs			
3,4,4',5-TCB (81)	0.0001	0.0005	0.1
3,3',4,4'-TCB (77)	0.0003	0.0001	0.05
3,3',4,4',5 - PeCB (126)	0.1	0.005	0.1
3,3',4,4',5,5'-HxCB(169)	0.03	0.00005	0.001
Mono-ortho PCBs			
2,3,3',4,4'-PeCB (105)	0.00003	<0.000005	0.0001
2,3,4,4',5-PeCB (114)	0.00003	<0.000005	0.0001

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

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



END OF PERMIT