

SKELTON GRANGE ENERGY FROM WASTE FACILITY ENVIRONMENTAL PERMIT APPLICATION

Non-Technical Summary

Prepared for: WTI EfW Holdings Limited

SLR Ref: 416.07232.00002
Version No: 1
August 2019



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Drawing 005	Site Drainage Layout

APPENDICES

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1.0 Introduction

WTI EfW Holdings Limited has instructed SLR Consulting Limited (SLR) to prepare a bespoke Environmental Permit (EP) application for the proposed Skelton Grange Energy from Waste (EfW) facility to be located at Skelton Grange near Leeds, under the Environmental Permitting (England and Wales) Regulations 2016 (as amended). The application is submitted in the name of WTI UK Ltd (WTI).

This document provides a Non-Technical Summary (NTS) of the proposed facility, including:

- an explanation of what is being applied for;
- a summary of the regulated facilities; and
- a summary of the key technical standards and control measures relating to the proposed changes.

1.1 The Site

The proposed EfW facility will be situated at Skelton Grange, Leeds, West Yorkshire, LS10 1RR at National Grid Reference (NGR) 433423, 431179. The Site is accessed via Skelton Grange Road to the southwest and lies within an area predominately occupied by commercial/industrial premises, sewage works, derelict ground and areas of woodland/open ground. Historically the site was occupied by Skelton Grange coal-fired Power Station which operated between 1951 and 1990. The site has since been cleared of all infrastructure and remained undeveloped.

The location of the site is shown on Drawing 001 and the permit boundary and detailed site layout is shown in Drawing 002. The surrounding land uses and local receptors within 500m and 1km are shown on Drawing 003 and cultural and natural heritage receptors within 2km are illustrated on Drawing 004.

A summary of the Site's immediate surrounding land uses is provided in Table 1 below.

Table 1
Surrounding Land Uses

Boundary	Description
North	Mix of commercial/industrial premises and derelict land. Beyond is Knostrop sewage works facility.
East	The majority of the land to the east is derelict ground with woodland/open ground beyond.
South	Adjacent to the south of the Site is woodland/open ground, the River Aire and Aire & Calder Navigation, with predominately commercial/industrial premises beyond.
West	To the west of the Site is commercial/industrial premises, a recreational/educational facility and areas of woodland/open ground.

1.2 Pre-Application Discussions

A pre-application meeting was held on Friday 7th June between SLR, WTI and the Environment Agency. Notes of the meeting are provided in Appendix NTS1.

2.0 Proposed Development

2.1 Process Overview

The proposed Skelton Grange EfW facility will process municipal solid waste, commercial, industrial, sewage sludge and non-infectious clinical waste at a capacity of up to 410,000 tonnes per annum. The facility will consist of two-lines, with technology based on conventional thermal incineration comprising moving grate furnace, steam boiler and turbine generator to produce electricity and with the potential to recover waste heat.

The twin boilers will comprise two combustion and steam generating units. In the combustion units, waste will undergo thermal treatment in line with the requirements specified in the Industrial Emissions Directive for the incineration of waste. The thermal energy released will be used to raise high pressure and high temperature steam to produce electricity in the turbine-generator and/or to provide heat/steam for export.

The combustion of waste will release flue gases which will be treated in order to comply with the requirements of the Industrial Emissions Directive. Selective non-catalytic reduction (SNCR) using urea or ammonia as the reagent will be used to reduce nitrogen oxides (NOx). A lime scrubber and powdered activated carbon (PAC) will be used within the flue gas treatment system to control emissions of acid gases, mercury and dioxins/furans. The by-products from both reactions are captured in the fabric filter as air pollution control residues (APCR). The treated flue gases then leave each boiler line through the two 90m stacks. Figure 1 illustrates the process:

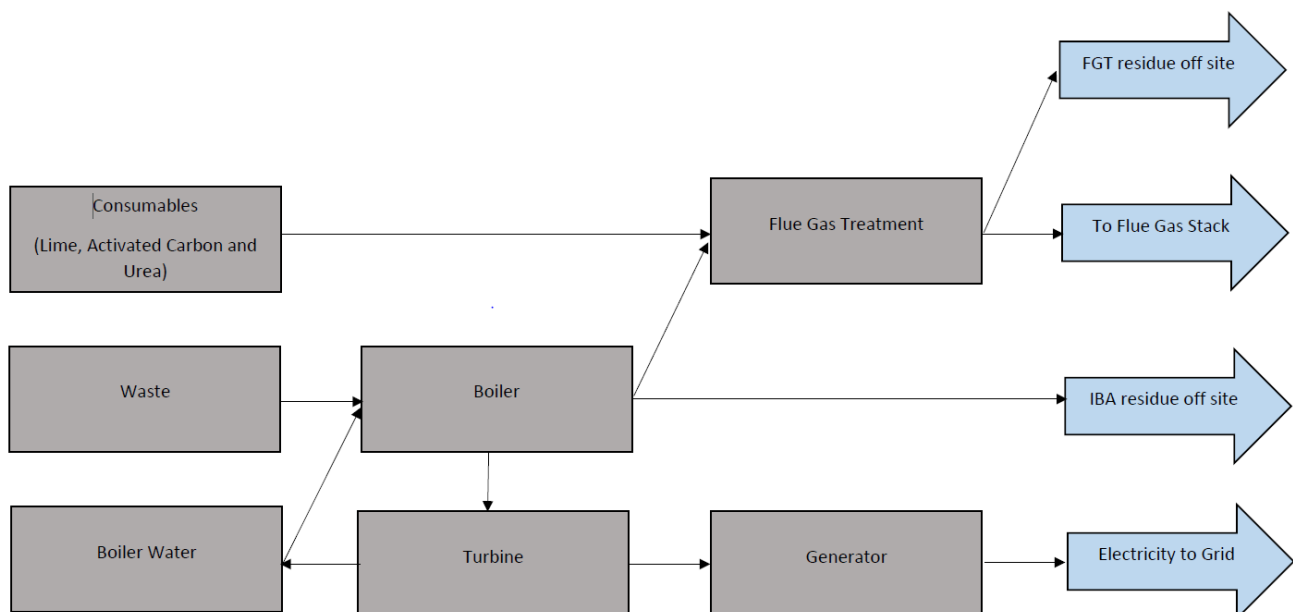


Figure 1
Process Flow Diagram

2.1.1 Waste Reception and Storage

Up to 410,000 tonnes per annum will be received in the waste reception hall where delivery vehicles will discharge loads into the waste storage bunker. The waste will be mixed in the bunker and then fed into the feed

hoppers by an overhead crane. The waste will travel down the feed chutes and be pushed onto the boiler grates by ram feeders.

The exception to this would be partially dried sludges from waste water treatment (dry solids content of approximately 20-25%). These would be delivered to the waste reception hall and unloaded in to a dedicated container for storage. From here they would be fed and metered into the feed chute separately to feedstock delivered from the bunker.

2.1.2 Energy Recovery Facility

The facility will process waste using an air cooled, moving grate technology. The energy recovered from the combustion of waste will be utilised (in the form of high-pressure steam) to produce electrical power through a steam turbine and generator unit. The facility will have the capability to provide combined heat and power (CHP) through a blanking flange and heat/steam export from the turbine.

Key components of the technology will include, but shall not be limited to:

- two-line furnace/boiler units incorporating moving grate technology and steam boiler with an energy recovery system;
- flue gas treatment (FGT) system comprising selective non-catalytic reduction (SNCR), acid gas scrubbing reactor, activated carbon injection and bag house filters;
- steam turbine/generator set with the capability for CHP operation;
- condensate system, including air cooled condensers (ACC);
- residue handling and storage facilities;
- electrical equipment associated with the facility and its connection to the national grid;
- continuous emissions monitoring system (CEMS); and
- auxiliary equipment.

The facility will be designed to generate approximately 41.6 MW and export approximately 38 MW of electricity. The facility will be capable of exporting heat, thereby having the potential to operate as a CHP facility if required.

2.1.3 Incinerator Bottom Ash (IBA) & Air Pollution Control Residues (APCR)

IBA remaining after the combustion of the waste will be discharged from the end of the combustion grate directly into an ash quench bath. Ash from the first to fifth boiler pass will also discharge to the IBA.

IBA will be exported off-site to a suitable re-processing facility for recovery as IBA aggregate (IBAA) and the Air Pollution Control Residues (APCR) will be conveyed to silos for storage and exported off site for treatment and disposal.

3.0 What Is Being Applied For

3.1 Regulated Facilities

The Environmental Permitting (England & Wales) (Amendment) Regulations (EPR) 2016 (as amended) require regulated facilities to be operated in accordance with an EP. WTI are applying for an EP to undertake the following activity listed in Schedule 1 of the EPR:

- Schedule 1 Part 2 Section 5.1 Part A (1) (b) – the incineration of non-hazardous waste in a waste incineration plant or waste co-incineration plant with a capacity exceeding 3 tonnes per hour.

This activity is regulated as an installation and requires a bespoke permit to operate.

3.2 Specified Waste Management Activities

The waste management activities to be carried out at the site are as follows:

- R1: Use principally as a fuel or other means to generate energy; and
- R13: Storage of wastes pending any of the operations numbered R1 to R12.

3.3 Directly Association Activities

The following directly associated activities will be undertaken at the Site:

- receipt, storage and handling of waste;
- discharge of clean surface run-off to controlled waters;
- emergency diesel generators;
- storage and handling of products and residues; and
- storage of raw materials and spent reagents.

3.4 Waste Types

The site will accept up to 410,000 tonnes per annum of residual municipal waste, commercial & industrial waste, sewage sludge and non-infectious clinical waste. Acceptance of sewage sludge would be limited to a maximum of 15% of this throughput.

A full list of waste types categorised according to the European Waste Catalogue (EWC) codes is available as Appendix B3_1 to the Application Forms in Section 2 of this application.

4.0 Application Contents

To support this application, the following documentation is submitted in addition to this NTS:

- Section 2: Application Forms;
- Section 3: Drawings;
- Section 4: Site Condition Report;
- Section 5: Environmental Risk Assessment;
- Section 6: Human Health Risk Assessment;
- Section 7: Best Available Techniques & Operating Techniques;
- Section 8: CHP-Ready Plan; and
- Section 9: Fire Prevention Plan.

4.1 Application Forms

Parts A, B2, B3 and F1 of the EA's EP application forms have been completed in support of this application and are enclosed as Section 2 of this EP application. The application forms also include the following additional information required by the forms:

- Appendix A_1: List of Directors;
- Appendix B2_1: Summary of Environmental Management System (EMS); and
- Appendix B3_1: List of Wastes.

4.1.1 Application Fee

Under the EA's Environmental Permitting (England) Charging Scheme 2019, the fee for a permit application for EfW facility (reference 1.6.2, section 5.1) is £20,384 which consists of the following:

- EfW permit application - £18,638;
- Odour Management Plan - £1,246; and
- Advertising Fee - £500.

4.2 Drawings

A suite of drawings has been produced to detail all characteristics of the Site relevant to the application and are enclosed as Section 3 of this EP application. The full list of drawings produced is as follows:

- 001 Site Location Plan
- 002 Environmental Permit Boundary & Site Layout
- 003 Sources, Pathways and Receptors
- 004 Cultural and natural Heritage
- 005 Site Drainage Layout

4.3 Site Condition Report

The Site Condition Report (SCR) provides details of the baseline soil and groundwater conditions within the proposed EP boundary, so that a comparison can be undertaken at ultimate cessation of the activities.

The SCR is enclosed as Section 4 of this EP Application.

4.4 Environmental Risk Assessment

The Environmental Risk Assessment (ERA) has considered the risks posed by the proposed new EfW installation to the environment. It includes detailed assessments for the more significant risks including emissions to air, global warming potential, odour and noise as well as risks to amenity. The ERA is enclosed as Section 5 of this EP application.

4.4.1 Amenity & Accidents Risk Assessment

The amenity and accidents risk assessment has considered the risks from fugitive emissions, dust, releases to water, litter, mud, pests and potential accidents and incidents.

Subject to the implementation of the stated management measures, the conclusion has been reached that the proposed activities are unlikely to result in a significant accident risk or risk to the amenity of the local environment.

4.4.2 Air Emissions Risk Assessment

An Air Emissions Risk Assessment has been carried out to determine the potential effect of emissions from the proposed EfW on the air quality environment by comparison to relevant guidelines for the protection of human health and the environment. The risk assessment has been undertaken on 'worst case' assumptions and includes assessment under abnormal operating conditions, cumulative impacts with other large emitters in the vicinity and a sensitivity analysis.

The conclusions of the detailed atmospheric dispersion modelling assessment of the emissions from the EfW facility are as follows:

- there are no predicted exceedances of short-term or long-term standards at the point of maximum ground level impact or at relevant exposure locations for any of the scenarios assessed;
- the predicted impact on designated sensitive habitats are considered insignificant and will cause '*no significant pollution*' according to EA/Natural England guidance; and
- the model sensitivity assessment indicates none of the variations in the parameters investigated lead to exceedances of the standards or any material change to the overall conclusions of the assessment.

The AERA is enclosed as appendix ERA 2 in section 5 of this EP application.

4.4.3 Odour Management Plan

An Odour Management Plan (OMP) has been prepared to assess, reduce and prevent potentially odorous emissions. The OMP considers sources, releases and impacts and identifies appropriate odour management measures.

The OMP is enclosed as appendix ERA 3 in Section 5 of this EP application.

4.4.4 Noise Impact Assessment

A noise impact assessment (NIA) has been undertaken in accordance with BS4142:2014, whereby the sound sources under investigation have been compared to the existing background levels.

The specific sound levels generated by the operation of the site have been predicted at the closest receptors and has indicated that there is only a 'negligible' risk of adverse impact. For most receptors, the predicted specific noise level is very low and is unlikely to be noticeable against the residual noise environment. The assessment also demonstrates compliance with the conditions imposed within the planning consent.

Furthermore, with respect to noise from HGVs and staff cars travelling in and out of the site and onto surrounding roads, there is again only a 'negligible' risk of adverse impact.

The NIA is enclosed as appendix ERA 4 in Section 5 of this application.

4.4.5 Solid Residue Management Plan

A Solids Residue Management Plan (RMP) has been prepared to demonstrate how residue management and minimisation is carried out to minimise environmental risks.

The RMP is enclosed as appendix ERA 5 in section 5 of this EP application.

4.4.6 Global Warming Potential Assessment

The Global Warming Potential Assessment (GWP) has assessed the relative emissions of greenhouse gases from different waste treatment technologies compare to overall efficiency of combustion as a waste treatment solution. The assessment finds that the combustion of waste in this case is an effective and efficient means of waste management as a solution to the treatment of residual wastes.

The GWP is enclosed as Appendix ERA 6 in Section 5 of this EP Application.

4.5 Human Health Risk Assessment

The Human Health Risk Assessment (HHRA) concludes that the predicted impacts as a consequence of emissions from the EfW are all within limits for the protection of human health as defined by the Environment Agency and intake of dioxins and PCBs at all receptors are well below the EA's adopted Tolerable Daily Intake value of 2pg I-TEQ/kg BW/day.

This conclusion is considered robust on the basis of the worst-case approach adopted in the characterisation of emissions, the safety factors incorporated into the US-EPA HHRA Protocol, and the hypothetical worst-case exposure scenario considered in the assessment.

The HHRA is enclosed as Section 6 of this EP application.

4.6 Best Available Techniques & Operating Techniques

The Best Available Techniques & Operating Techniques (BATOT) document describes how the site has been designed and will be operated in accordance with Best Available Techniques (BAT) as described in the revised Waste Incineration Bref (December 2018). The document includes an overview of the technical, operational and management measures that will be implemented on Site.

The BATOT is enclosed as Section 7 of this EP application.

4.6.1 Acid Gas Abatement Assessment

The Acid Gas Abatement (AGA) Assessment has appraised the costs and environmental performance of appropriate techniques for the abatement of acid gases at the facility, including wet, semi-dry and dry techniques using different reagents. The assessment will be used to select the appropriate technique and process controls.

The AGA is enclosed as Appendix BATOT 2 in Section 7 of this application.

4.6.2 NOx Abatement Assessment

A NOx Abatement Assessment has been devised as part of this application to present the cost-benefit and options appraisal that demonstrates the relative merits of primary measures, SNCR for NOx control at the installation. The NOx Abatement Assessment has been prepared in accordance with the EA guidance.

The NOx Abatement Assessment is enclosed as Appendix BATOT 3 in Section 7 of this EP Application.

4.7 CHP Ready Plan

The Combined Heat and Power (CHP) Plan provides a cost-benefit assessment of opportunities to supply heat to external users in accordance with Schedule 24 of the EPR and Article 14 of the Energy Efficiency Directive.

The CHP plan is enclosed as Section 8 of this application.

4.8 Fire Prevention Plan

The Fire Prevention Plan (FPP) has been prepared in accordance with EA's guidance to establish the required mitigation and management methods to prevent a fire of materials stored on Site.

The FPP is enclosed as Section 9 of this EP Application.

5.0 Technical Standards and Control Measures

The key technical standards laid out in the following documents govern the design and operation of the Site:

The key technical standards that will be followed for the Site are:

- European Commission Joint Research Centre – Best Available Techniques Reference document on Waste Incineration (Final Draft December 2018);
- Defra – Environmental Permitting Guidance: Waste Incineration (December 2015);
- Environment Agency - A1 installations: environmental permits (April 2018);
- Environment Agency - Legal operator and competence requirements: environmental permits (February 2016);
- Environment Agency - Develop a management system: environmental permits (April 2018);
- Environment Agency - Risk assessments for your environmental permit (May 2018);
- Environment Agency - Control and monitor emissions for your environmental permit (May 2018);
- Environment Agency - Best available techniques: environmental permits (February 2016);
- Environment Agency – How to comply with your environmental permit. Additional guidance for: The Incineration of Waste (EPR 5.01, March 2009);
- Environment Agency - Energy efficiency standards for industrial plants to get environmental permits (February 2016);
- Environment Agency - CHP Ready Guidance for Combustion and Energy from Waste Power Plants, (Version 1.0, February 2013); and
- Environment Agency – Fire Prevention Plans: Environmental Permit (May 2018).

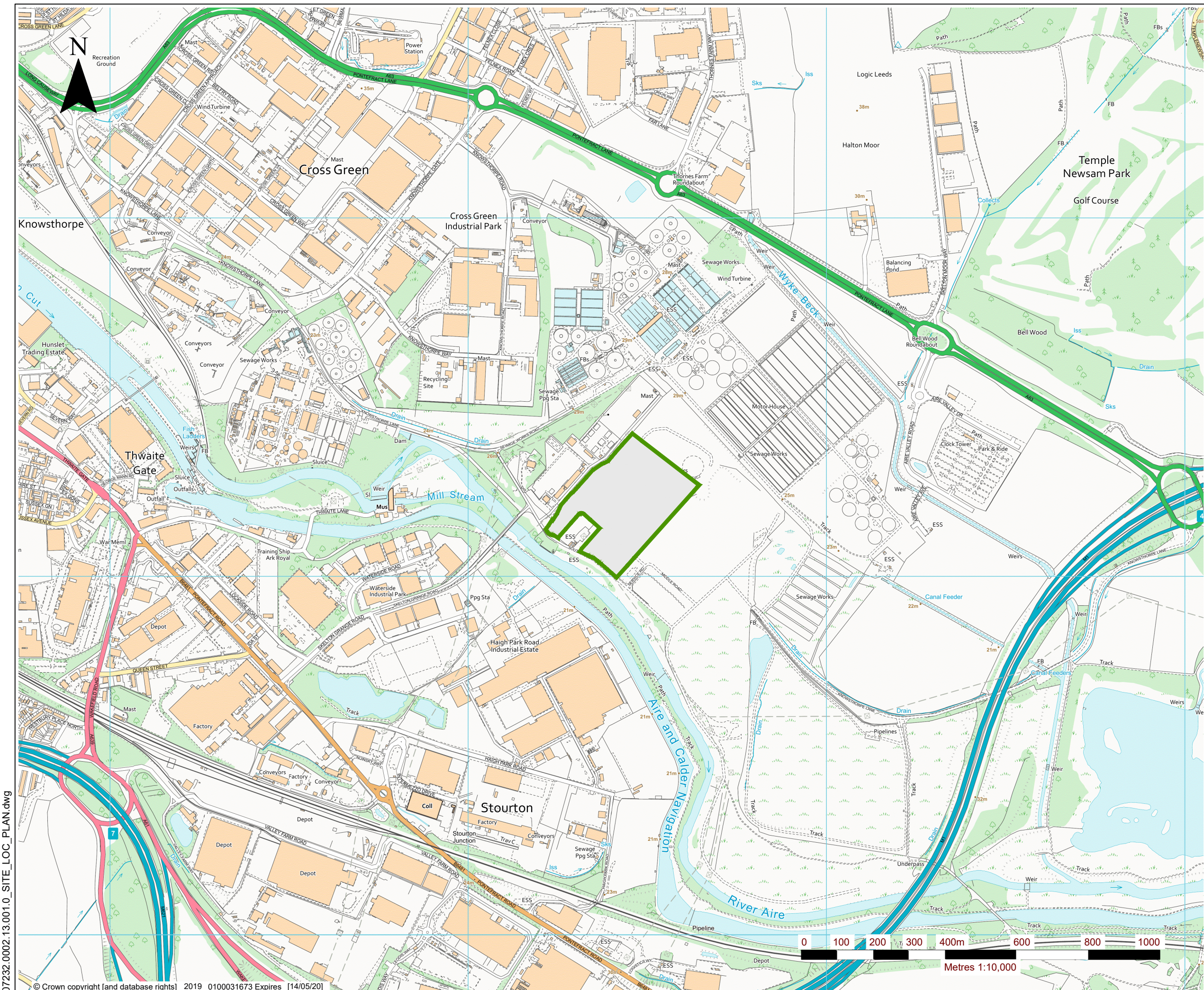
The control measures relevant to the proposed activities are described in the BAT-OT and ERA submitted with this application.

The proposals have been assessed against these standards and are all considered to meet the relevant technical standards.


The overall conclusion is that there is unlikely to be a significant environmental impact as a result of the proposed activities on Site.

WTI is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the Company's integrated EMS.

DRAWINGS



LEGEND

 ENVIRONMENTAL PERMIT BOUNDARY

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SKELTON GRANGE EFW ENVIRONMENTAL PERMIT APPLICATION SITE LOCATION PLAN DRAWING 001

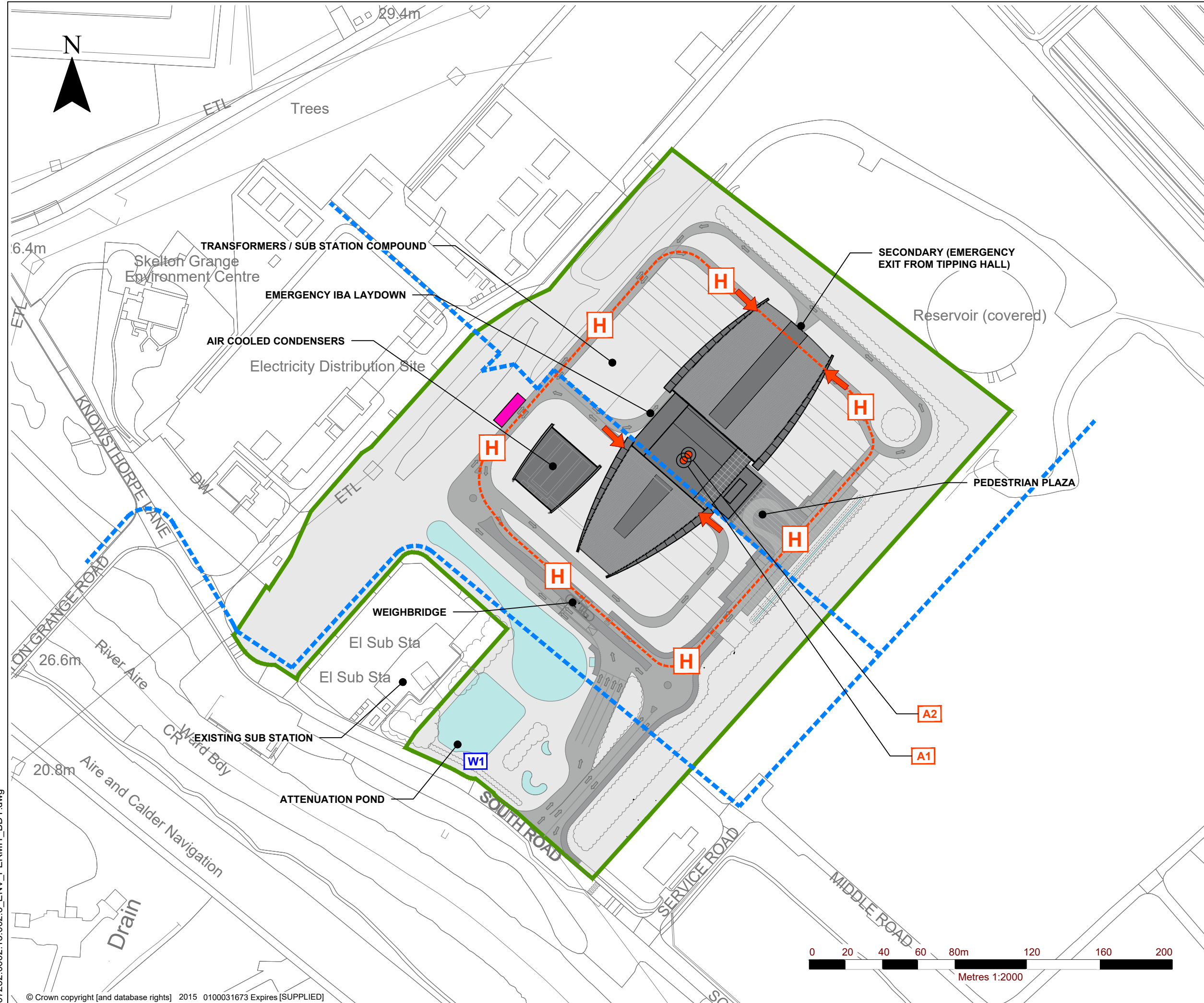
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NOTES

1. DRAWING IS BASED ON HARWORTH GROUP LAYOUT 1 DRAWING, REF: 018/LLE /NAR/A0, DATED: 08/02/19.

- LEGEND**
- ENVIRONMENTAL PERMIT BOUNDARY
 - ACCESS FOR FIRE AND RESCUE SERVICE
 - INDICATIVE LOCATION OF FIRE HYDRANTS
 - INDICATIVE LOCATION OF QUARANTINE AREA FOR HOT LOADS (20m x 6m)
 - WATER MAINS

- EMISSION POINTS**
- STACK EMISSIONS TO AIR
 - STACK EMISSIONS TO AIR
 - DISCHARGE TO SURFACE WATER

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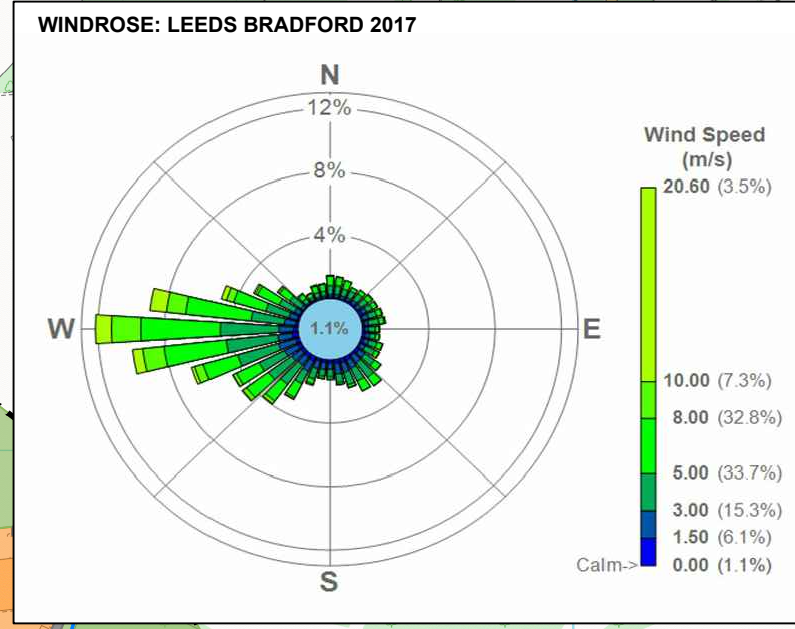
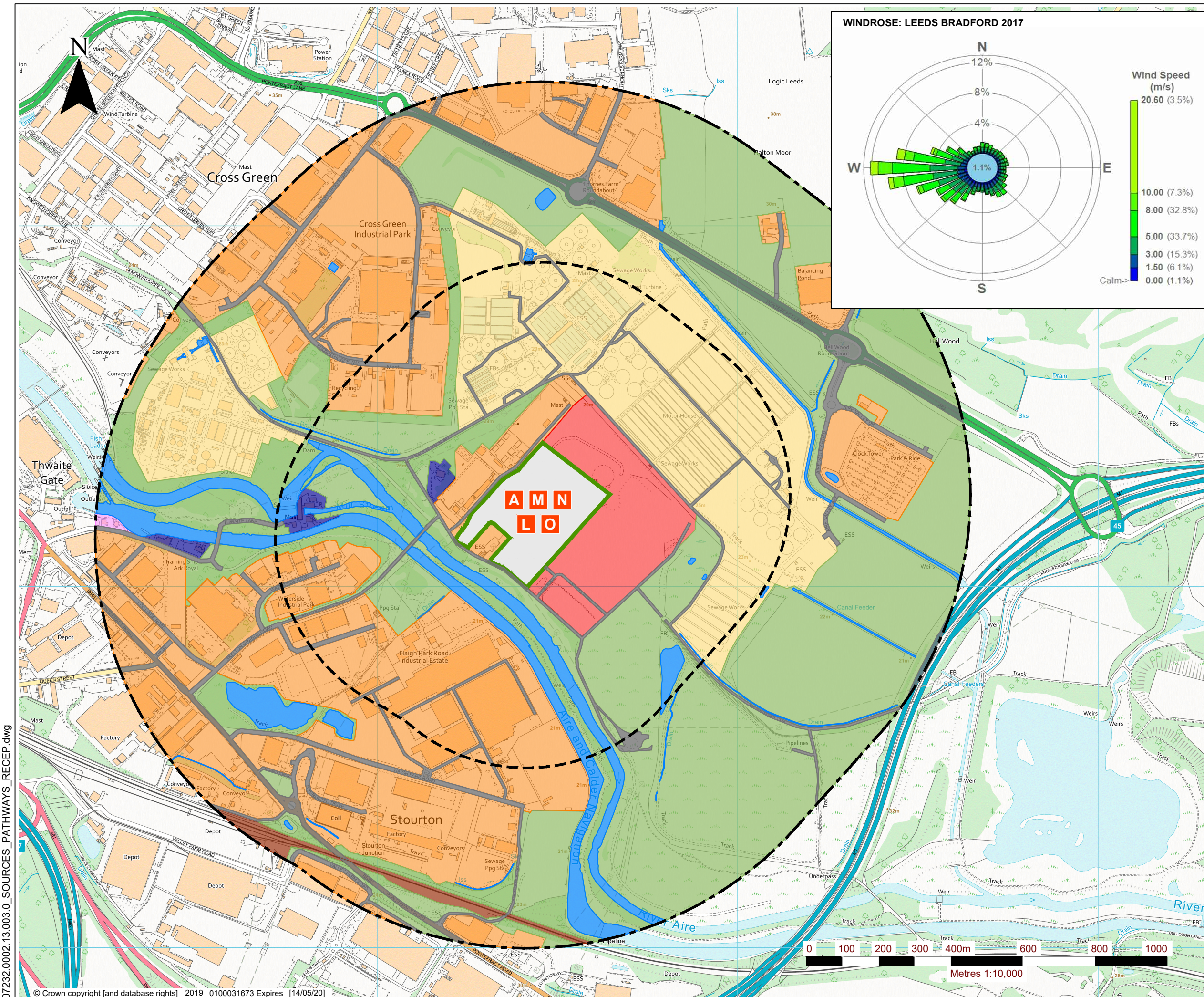
SKELTON GRANGE EFW
ENVIRONMENTAL PERMIT APPLICATION
ENVIRONMENTAL PERMIT BOUNDARY
DRAWING 002

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LEGEND

- ENVIRONMENTAL PERMIT BOUNDARY
- 500m BOUNDARY OFFSET
- 1Km BOUNDARY OFFSET
- LOCAL ROAD NETWORK
- COMMERCIAL / INDUSTRIAL
- RESIDENTIAL
- OPEN WATER / DITCHES
- WOODLAND / OPEN GROUND
- DERELICT GROUND
- RECREATIONAL / EDUCATIONAL / COMMUNITY
- SEWAGE WORKS
- RAILWAY

SOURCE TERMS

AIRBORNE EMISSIONS	MUD ON ROAD
LITTER	NOISE
ODOUR	

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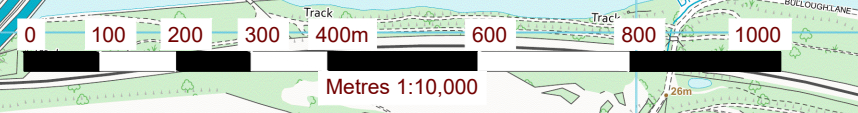
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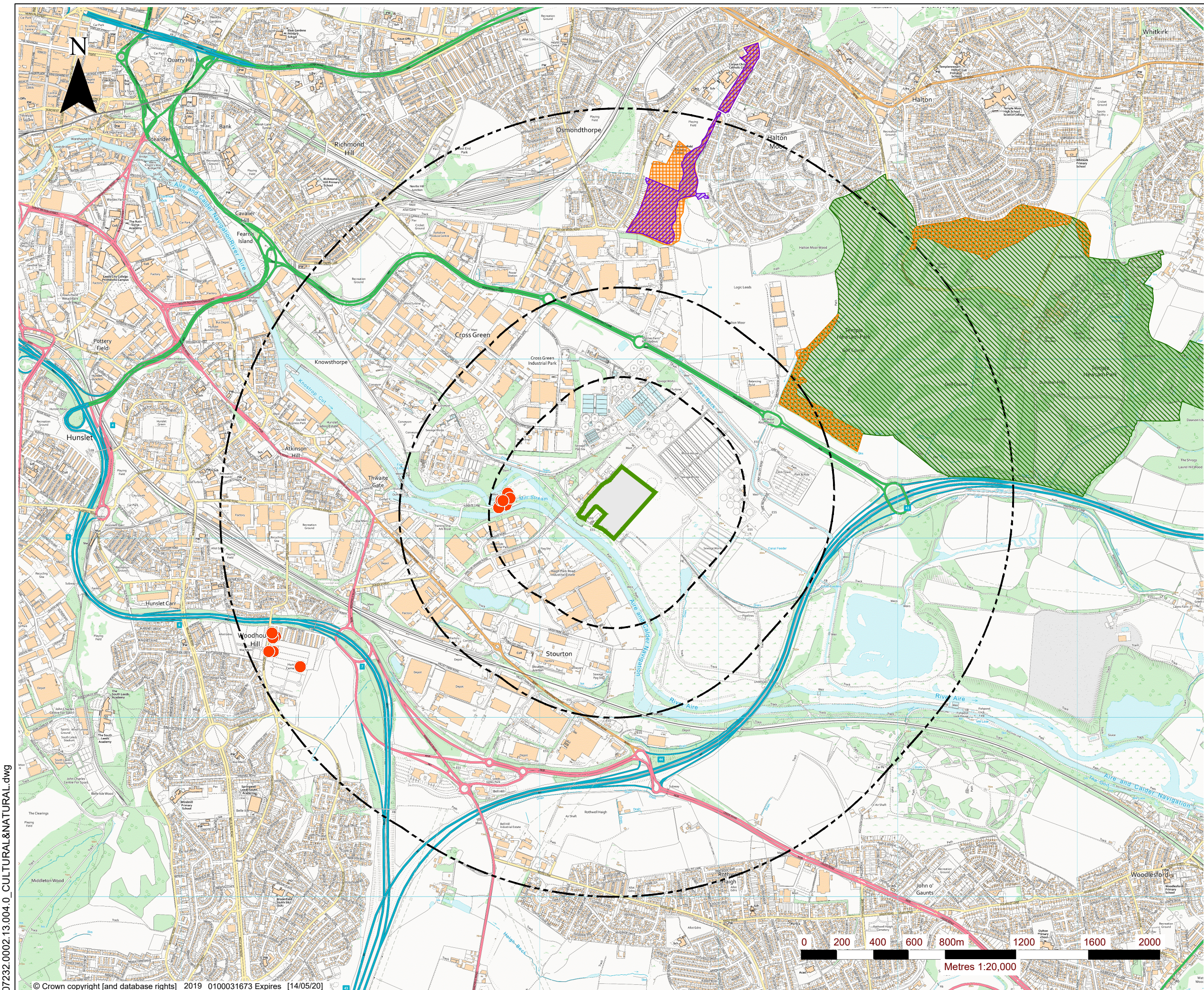
SKELTON GRANGE EFW
ENVIRONMENTAL PERMIT APPLICATION
SOURCES, PATHWAYS AND RECEPTORS

DRAWING 003

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LEGEND

	ENVIRONMENTAL PERMIT BOUNDARY
	500m BOUNDARY OFFSET
	1km BOUNDARY OFFSET
	2km BOUNDARY OFFSET
	LISTED BUILDINGS
	HALTON MOOR LOCAL NATURE RESERVE (LNR)
	TEMPLE NEWSAM REGISTERED PARK AND GARDEN
	LOCAL WILDLIFE SITE

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SKELTON GRANGE EFW ENVIRONMENTAL PERMIT APPLICATION CULTURAL AND NATURAL HERITAGE

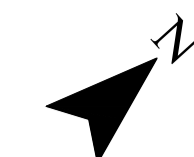
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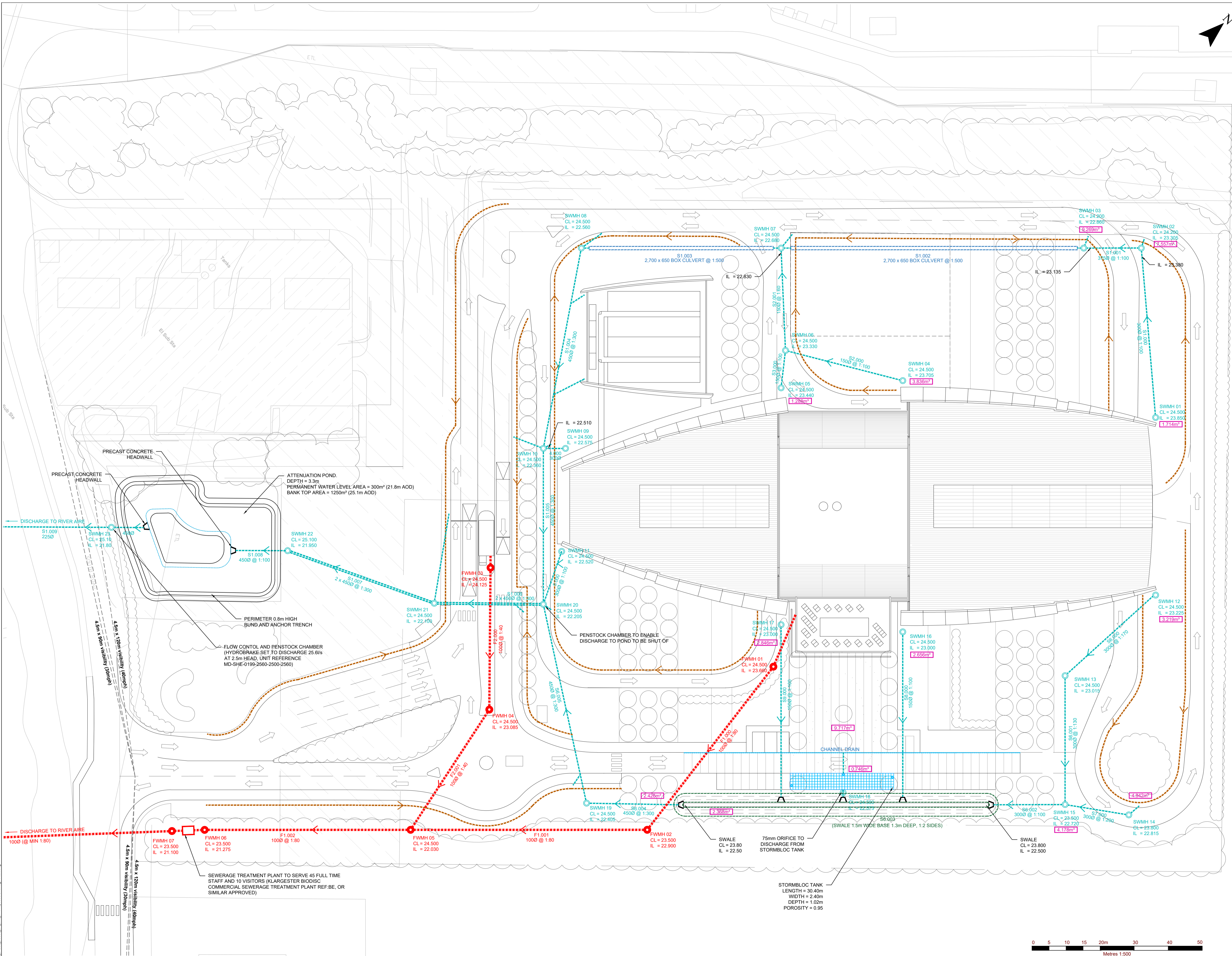
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- NOTES**
- DRAWING PREPARED FOR THE SITE PERMIT. **NOT FOR CONSTRUCTION.**
 - ALL LEVELS INDICATED ARE TO OS DATUM (METRES) FROM PROPOSED LEVELS. DESIGN TO BE REVIEWED FOLLOWING DETAILED SITE LAYOUT DESIGN.
 - PIPE ROUTES CROSSING THE SERVICES STRIP (S1.007 & F1.002) WILL REQUIRE CLASH CHECK WITH LOCATION OF EXISTING SERVICES.
 - ALL DIMENSIONS ARE IN MILLIMETERS UNLESS OTHERWISE NOTED.
 - DRAINS TO BE LAID IN CLASS 'S' BEDDING WHERE COVER IS GREATER THAN 1200mm. WHERE DEPTH OF COVER IS LESS THAN 1200mm A CONCRETE BED AND SURROUND SHALL BE PROVIDED.
 - THE CONTRACTOR IS TO CHECK AND VERIFY ALL BUILDING AND SITE DIMENSIONS, LEVELS AND DRAIN INVERT LEVELS AT CONNECTION POINTS PRIOR TO COMMENCEMENT OF WORKS.
 - BASE DRAWING TAKEN FROM PLANNING DRAWING UNDERTAKEN FOR BIFFA.
 - SITE LAGOON DETAILS TAKEN FROM DESIGN CARRIED OUT FOR SYCAMORE PLANNING.
 - CONNECTIONS ARE TO BE CROWN TO CROWN UNLESS NOTED OTHERWISE. MANHOLE INVERT LEVELS REPORTED ARE TO THE DISCHARGE PIPE.

- LEGEND**
- LINED FILTER STRIP AND FILTER DRAIN
 - 2.70m WIDE BY 0.65m DEEP BOX CULVERT.
 - SWALE (1.5m BASE WIDTH, 1.3m DEEP, 1:2 SIDES).
 - PRECAST CONCRETE HEADWALL.
 - SURFACE WATER DRAINAGE.
 - FOUL WATER DRAINAGE.
 - SURFACE WATER DRAINAGE MANHOLE.
 - FOUL WATER DRAINAGE MANHOLE.
 - TEMPORARY SURFACE FLOODING DURING A 1:100 YEAR EVENT (+40% CLIMATE CHANGE ALLOWANCE).



Revision	By	Chk'd By	Date	Comments
1	IMR	DP	JUL 19	REVISED DETAILS
0	IMR	DP	06/19	SITE PERMITTING

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Site: SKELTON GRANGE

Project: ENERGY FROM WASTE (EW) FACILITY

Drawing Title: **SITE DRAINAGE**

Scale: 1:500 @ A1 Date: JULY 2019

Drawing Number: **005** Revision: **1**

PERMITTING



APPENDIX NTS 1

Notes from Pre-application Meeting

Pre-application Advice: Skelton Grange EfW.

Baseline fee required	<p>Ref 1.6.2 - £18,638 + £500 fee for advertising.</p> <p>Possible additional cost (if management plans are submitted noise/odour etc.). However FPP is incorporated into the application fee so no need for additional component. Also as it stands there are no Habitat sites within screening distance, so no additional fee for habitat assessment.</p> <p>Also note the charging scheme includes a provision for charging time and materials for high public interest applications. It is unclear at the moment whether the site will be high public interest. See section 2.5 of charging scheme.</p>
Forms required to be submitted	<p>You should complete and provide the information detailed in the following application forms:</p> <p>Part A - https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-a-about-you</p> <p>Part B2 - https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b2-new-bespoke</p> <p>Part B3 – https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-b3-new-bespoke-installation</p> <p>Part F1 - https://www.gov.uk/government/publications/application-for-an-environmental-permit-part-f1-opra-charges-declarations</p>
Additional documents required	<p>Attached is a checklist of information and assessments we would expect see in an application.</p>
Additional information	<p>List of legislation/guidance/standards and Links</p> <p>EPR Regulations 2016 - http://www.legislation.gov.uk/ukxi/2016/1154/contents/made</p> <p>Industrial Emission Directive - https://eur-lex.europa.eu/legal-content/FR/TXT/PDF/?uri=CELEX:32010L0075&from=EN</p> <p>Incineration BRef (BAT Conclusions) - http://eippcb.jrc.ec.europa.eu/reference/BREF/WI/WI_5_24-05-2017_web.pdf</p> <p>Sector Guidance Note Incineration of waste EPR5.01- https://www.gov.uk/government/publications/incineration-of-waste-epr501-additional-guidance</p> <p>Group 3 metals Assessment Guide - https://www.gov.uk/government/publications/waste-incinerators-guidance-on-impact-assessment-for-group-3-metals-stack</p> <p>Environmental Risk Assessment Guidance https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit</p> <p>Air emission risk assessment Guidance - https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit</p>

	<p>H4 Odour Management Guidance - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296737/geho0411btqm-e-e.pdf</p> <p>H3 noise assessment guidance - https://www.gov.uk/government/publications/environmental-permitting-h3-part-2-noise-assessment-and-control</p> <p>Fire Prevention Plan Guidance - https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits</p> <p>Habitat Assessment detailed Modelling Approach Emission to Air Guidance AQTAG06 - http://bailey.persona-pi.com/Public-Inquiries/A465-English/8%20Air%20Quality/8.2.2%20%20AQTAG06_Technical%20Guidance%20Assessment%20emissions%20to%20air%20Mar2014.pdf</p> <p>CHP Ready - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/296450/LIT_7978_e06fa0.pdf</p> <p>Cost Benefit Assessment for combustion Installations – Draft guidance on completing cost-benefit assessments for installations under Article 14 of the Energy Efficiency Directive. (attached)</p> <p>CBA Template (attached)</p> <p>Monitoring Guidance M1, M2 and M20 for emissions to air. M18 for monitoring to water. https://www.gov.uk/government/collections/monitoring-emissions-to-air-land-and-water-mcerts</p>
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Additional guidance

PCB/Dioxin like PCBs	Make you consider dioxin like PCBs in your dioxin/furans assessment in the HHRA.
Emissions to air	Assess all of the substances for which limits are specified in IED annex VI. In addition include PAHs and PCBs should be considered and compared against EALs.
Habitats and conservation sites	Not all sites identified and assessed. Incorrect critical levels/loads applied. Ensure you following AQTAG06.

Abnormal Operations	Ensure that abnormal operations assessment is completed correctly. You must consider the environmental impact of operating under IED chapter IV abnormal operations as well as normal periods of operation. This will normally be limited to consideration of impacts against short term EAL/EQs. We would expect at least the following to be included.
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	NO ₂ , acid gases, particulate matter, metals and PCBs against short term EQSs. Also in the event of dioxin (including PCBs) abatement failure, because the increase could be 100 fold, the effect of the increase should be compared to the TDI.
Metals Assessment	For metals applicants should refer to our guidance – Waste incinerators – guidance on impact assessment for group 3 metals stack.
Stack height Assessment	Ensure you include a justification that your stack height is BAT. Cost benefit analysis may be required
Fire Prevention Plan.	Ensure that you submit a plan. Follow the FPP guidance carefully and ensure that you demonstrate your installation will comply with all the relevant requirements. Ensure that for any requirements that are not met that you propose alternative measures.
Noise assessment	Using out of date background data and no justification that it still reflects current background. Justification for model input data – where is data derived from (i.e. measurement, equivalent plant)
Contamination of surface water runoff.	Ensure you clearly explain what measures and techniques you will employ to ensure surface water runoff is not contaminated, particularly contamination from IBA.

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