



Environmental Permitting (England and Wales) Regulations 2016

Environmental Permit Application – Decision Document

Name & address of Operator:	R.A Latta Farms Ltd Bridge Farm Holme Fen Drove Colne Huntingdon PE28 3RE
Address of Activity:	As above
Type of Activity:	Small Waste Incineration Plant
Date of Application:	21st July 2017
Date Duly Made:	21st August 2017
Date of issue of Permit:	
Permit Reference:	

DECISION

With regard to the above application Huntingdonshire District Council (the regulator) has made a draft determination to issue an Environmental Permit in accordance with the Environmental Permitting (England & Wales) Regulations 2016, being satisfied that the process will be operated in such a manner that it will not cause significant damage to human health or the environment. The decision process, responses to the consultation regarding the application and the justification of the permit conditions is detailed below. The draft Permit is a separate document which can also be accessed via Huntingdonshire District Council's website.

The Environmental Permit contains conditions that the authority considers necessary to achieve compliance with the requirements of the relevant

regulations. The Activity will be inspected, as required by the regulations, and compliance with the Permit conditions assessed. The Permit may be varied at any time, in accordance with the regulations, and either informal or formal action taken in order to achieve compliance with the conditions.

Representations on the draft decision can be made to the Environmental Protection Team at Huntingdonshire District Council, Pathfinder House, St Mary's Street, Huntingdon, PE29 3TN, or via the Council email address: envhealth@huntingdonshire.gov.uk **within 20 working days**, being 21st February 2018. In all correspondence please quote the following reference number 23794.

If the Council does not receive any representations, the Council's decision will be made final and the applicant will be notified **within 5 working days** of the end of the period for representations.

If the Council does receive representations, the Council's decision will be finalised and notified to the applicant and to the public by means of the Huntingdonshire District Council website, **within 15 working days** of the end of the period for representations, or a longer period as the Council may agree with the applicant.

Decision process	
Can the application be duly made?	Further information was required and supplied on 21 st August 2017. The application was duly made on 21 st August 2017.
Was commercial confidentiality requested?	No.
Did the Application contain all the necessary information?	Further information was received on the 21 st and 22 nd August.
How was Public Participation (PP) undertaken?	A copy of the Application form and the supporting documentation was placed on Huntingdonshire District Council's website. Email correspondence with a link to the documentation was sent to Public Health England, The Environment Agency and The Food Standards Agency. The responses, where received are provided below.
What impact did the responses to PP have?	Two responses were received from Public Health England (PHE), requiring further information and then responding to this. PHE requested care to be taken in setting emissions concentration limits for stack gases and for fugitive emissions to prevent negative impact on health.
Can an Environmental Permit be issued? What is the legal framework for issuing an Environmental Permit?	From the information and responses received it is considered appropriate to allow the issue of an Environmental Permit subject to the inclusion of suitable permit conditions.
What guidance documents were used to draft the permit conditions?	The conditions are based on the requirements of Schedule 13 of the EPR and the relevant Articles and sections of the Industrial Emissions Directive referred to within. The origin of the permit conditions is provided below followed by the draft Environmental Permit.
How will PP be undertaken on the Draft Determination?	A copy of this consultation will be placed on Huntingdonshire District Council's website. Email correspondence with a link to the documentation was sent to Public Health England, The Environment Agency and The Food Standards Agency.
When are responses due?	21 st February 2018
What impact did the responses to PP have?	
Permit issued?	

Initial consultation responses to the Environmental Permit application



Public Health
England

Centre for Radiation, Chemical and
Environmental Hazards
Skipton House, 80 London Road
London
SE1 6LH

T: 020 7811 7141

Aaron Morley
Environmental Protection Officer
Huntingdonshire District Council
Pathfinder House
St. Mary's Street
Huntingdon
PE29 3TN

[by email]

11 September 2017

Dear Mr Morley,

**Environmental Permit application for R.A Latta Farms Limited, Bridge Farm,
Holme Den Drove, Colne, Huntingdon, Cambridgeshire, PE28 3RE
Part A2 PPC Permit Application Consultation**

Thank you for consulting Public Health England (PHE) on the above Environmental Permit application on 22 August 2017. It is understood that the application is for a small waste incineration plant, that will utilise virgin wood chip, and Grade A, B and C recycled waste wood.

The site is located in a predominantly rural area, approximately 1.5km east of Colne and 2km southeast of Somersham. There are isolated residential dwellings within 500m, the closest of which is situated approximately 150m south of the installation.

There is very little detail provided within the application on the expected point sources emissions from the site. However, we understand that the plant is required to be compliant with the Industrial Emissions Directive (IED) (which incorporates the Waste Incineration Directive (WID)) and as such will need to meet specified emission limits.

There is also the potential for fugitive emissions, for example from fuel and ash handling and storage, based on the information provided in the application these appear to be contained/ automated systems.

The application documentation (i.e. Biomass Plant Detail section) states that dispersion modelling will determine the required flue height and will be detailed within the Air Quality assessment for the proposed plant. This information does not

appear to be included within the application and therefore we are not able to fully consider atmospheric emissions and their potential impacts off-site.

We recommend that any Environmental Permit issued for this site should contain conditions to ensure that the following potential emissions do not impact upon public health: products of combustion emitted via the stack (e.g. oxides of nitrogen (NO_x); carbon monoxide (CO); particulate matter; volatile organic compounds (VOC) & formaldehyde; chlorides and metals); fugitive emissions from storage/handling of wood waste, management of ash and flue gas treatment waste.

The application highlights a number of potential pollutants that may be released in an accident scenario. The applicant states that these pollutants and others identified during the applicants risk assessment stage will lead to the development of appropriate mitigation procedures to prevent pollution. It is unclear when this work will be completed, however we would recommend that this is undertaken prior to operation and that control and mitigation measures should be put in place to minimise the potential for off-site impacts in the event of an incident.

Any additional information obtained by the Environment Agency in relation to these comments should be sent to PHE for consideration. Such information could affect the comments made in this response.

Yours sincerely



Adrienne Dunne
Environmental Public Health Scientist
adrienne.dunne@phe.gov.uk

CC: East of England PHE Centre; and Cambridge County Council Public Health team

Further information received. PHE consulted and responded as follows:



Public Health
England

Centre for Radiation, Chemical and
Environmental Hazards
Skipton House, 80 London Road
London
SE1 6LH

T: 020 7811 7141

Aaron Morley
Environmental Protection Officer
Huntingdonshire District Council
Pathfinder House
St. Mary's Street
Huntingdon
PE29 3TN

[by email]

20 September 2017

Dear Mr Morley,

Environmental Permit application for R.A Latta Farms Limited, Bridge Farm,
Holme Den Drove, Colne, Huntingdon, Cambridgeshire, PE28 3RE
Part A2 PPC Permit Application Consultation
Additional information: Air Quality Assessment, Bridge Farm Biomass Boiler

Thank you for consulting Public Health England (PHE) on the air quality assessment for the above Environmental Permit application received on the 11 September 2017. This response should be read in conjunction with our previous correspondence dated 11 September 2017.

The submitted Air Quality Assessment considers the potential impact on ambient air quality of products of combustion (i.e. nitrogen dioxide (NO₂), particulate matter (PM₁₀), sulphur dioxide (SO₂) and carbon monoxide (CO)) from the biomass boiler. Detailed dispersion modelling has been undertaken for each pollutant to predict concentrations at a number of receptors surrounding the site for each of the 5 years modelled. The modelling has used meteorological data from 2010-2014, however it is unclear why this timeframe was selected. The assessment is based on a worst-case scenario that emissions will be comparable to the Industrial Emissions Directive (IED) emission limit values and the installation will run 24hrs/day throughout the year. The dispersion modelling results indicate that estimated concentrations (including existing background levels) for NO₂, PM₁₀, SO₂ and CO are below long-term and short-term air quality objectives for each pollutant.

It is understood that the plant is required to be compliant with the Industrial Emissions Directive (IED) (which incorporate the Waste Incineration Directive (WID)) and as such will need to meet specified emission limit values. The submitted air

quality assessment indicates that point source emissions from the process are unlikely to be significant.

Any additional information obtained by Huntingdonshire District Council in relation to these comments should be sent to PHE for consideration. Such information could affect the comments made in this response.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adunne'.

Adrienne Dunne
Environmental Public Health Scientist
adrienne.dunne@phe.gov.uk

CC: East of England PHE Centre; and Cambridge County Council Public Health team

ORIGIN OF PERMIT CONDITIONS

The Permit conditions have been utilised to implement the requirements of Schedule 13 of the Environmental Permitting Regulations 2016, to ensure compliance with the following relevant Articles of the Industrial Emissions Directive 2010/75/EU.

Schedule 13 requirement	Subject	Condition(s) / note(s)
Article 5(1) and (3)	Granting of a Permit	Procedural
Article 7	Incidents and accidents	Condition 7.1
Article 8(2)	Non-compliance	Condition 7.2
Article 9	Emission of greenhouse gasses	Procedural
Article 42(1)	Scope	Procedural
Article 43	Definition of residue	Section 6
Article 45(1), (2) and (4)	List of waste types Capacity of plant Emission limit values Sampling frequencies and procedures Permissible periods of abnormal operation	Section 1 Section 1 Section 2 and 4 Section 4 and 5 Section 3
Article 46	Control of emissions	Section 2, 3 and 4
Article 47	Breakdown	Section 7
Article 48(1) to (4)	Monitoring of emissions	Section 4 and 5
Article 49	Compliance with emission limit values	Section 5
Article 50	Operating conditions	Section 3
Article 51(1) to (3)	Authorising changes to operating conditions	Procedural
Article 52	Delivery and reception of waste	Section 1
Article 53	Residues	Section 6
Article 54	Substantial change	Procedural
Article 55	Reporting and public information	Procedural
Article 82(5) and (6)	Transitional provisions	Procedural