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Ein cyf / Our ref: SA/SI/
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Dyddiad / Date: 13th October 2016

Dear Saul White

Environmental Permitting (England and Wales) Regulations 2010

Application EPR/AP3033HY by Grays Biomass Limited for the treatment of digestate from biogas production and will involve the introduction of drying process which will result in the production of compost, dried digestate and Ammonium Sulphate for use as a fertilizer at Mona AD Plant, Ecoparc Mon, Mona Industrial Estate, Gwalchmai, Isle of Anglesey, LL65 4RJ.

We welcome the opportunity to comment on this permit application. We have consulted with our colleagues at the Environmental Public Health Service (delivered collaboratively through Public Health Wales' Health Protection Team and Public Health England's Centre for Radiation, Chemical and Environmental Hazards Wales). This assessment is based on actual or potential health risks from environmental exposures to chemicals, noise from the proposed operations including emergencies and extreme environmental events such as flooding.

Any recommendations are for consideration by the Regulator and be reflected in any permit conditions made (see rationale below).

Proposed Operations

The applicant has previously submitted an application to operate an aerobic digestion (AD) waste treatment process, with capacity in excess of 100 tonnes per day, treating chicken litter, waste effluent from dairy farms, energy crops and glycerol. This variation application is to allow the drying of the digestate by evaporator and belt dryer, with each equipped with an air washing/scrubbing system. The digestate will be processed to form compost with a dry matter of 85%, the remaining liquid digestate will be de-watered to produce a soil enhancer.

The site lies approximately 2.5-3 km from Gwalchmai (west) and Llanelwney (east).

Overall Conclusion

We conclude that the impact of bio-aerosols have not been addressed in sufficient depth to comment upon in terms of public health impacts.

Public Health Risk Assessment

The application includes information on the emissions from the plant (including Nitrogen Dioxide, Carbon Monoxide, Sulphur Dioxide and Volatile Organic Compounds), however there is no interpretation as to how these emissions will behave when released in to the environment where public exposure could occur. **We recommend that the applicant undertake an air quality assessment to assess the impact of the emissions from road vehicles and the biogas engine on sensitive receptors.**

The applicant has assessed odour from the proposal and concluded the impact of odour at sensitive receptor locations will be negligible. However, given the perceived association between odour and ill-health, **we recommend that a robust odour management system is in place to reduce odour emissions so as not to give rise to community concerns.**

Bio-aerosols are naturally occurring bacteria and chemicals found in the air, produced when organic matter decomposes. They have been linked to health effects including respiratory problems, nausea, headaches and fatigue. **We recommend that the bio-aerosol assessment referenced in the application be forwarded to this office for review.**

An acoustic assessment of the operational noise from the proposed plant has been completed and includes recommendations to ensure protection of nearby residents. The applicant has accepted these recommendations in their noise management plan.

We recommend that any consent granted be subject to conditions, specifically these should include robust emissions management plans (dust, odour, noise), strict waste acceptance and handling criteria and provision of an accredited environmental management system (EMS).

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

Yours sincerely



Siobhan Adams
Interim Deputy Director of Public Health, North Wales