



**Cyfoeth
Naturiol
Cymru
Natural
Resources
Wales**

Steven van der Keift
2 Sisters Food Group
Glendale Avenue
Sandycroft
Flintshire
CH5 2QP

Ein cyf / Our ref: AP3633HT
Eich cyf / Your ref:

Dyddiad/Date: 03/03/14

Dear Steve,

Re. Proposed Anaerobic Digestion Trial, 2SFG Sandycroft

I am writing to you following receipt of your letter dated 21/02/14 requesting approval from Natural Resources Wales to complete an anaerobic digestion trial at your Sandycroft site.

The treatment of waste by anaerobic digestion at an existing permitted installation would normally require a permit variation to allow the activity to be carried out legally.

In this case we acknowledge that it would be disproportionate to require you to apply for a permit variation given the short duration of the trial.

Whilst the Environmental Permitting Regulations do not technically allow an exemption to be registered within an installation boundary, we agree that the trial can be conducted in accordance with the general requirements of the T25 Exemption 'Anaerobic digestion at premises not used for agriculture and burning of resultant biogas'.

Natural Resources Wales will adopt a time limited 'non enforcement position' with regards to this activity occurring at your site provided the following criteria are met;

- The trial is conducted in accordance with your document titled '*Proposal for H2E Trial AD Plant*' Subject to the following criteria (unless otherwise agreed in writing),
- The trial period is limited to 6 months from the start date (when waste is first introduced into the AD unit). Natural Resources Wales must receive written notification of your start date before the trial commences.
- Only blood originating from on site operations is digested (no importation of waste). EWC 02 02 02 only.

www.cyfoethnaturiolcymru.gov.uk

www.naturalresourceswales.gov.uk

Natural Resources Wales, Chester Road, Buckley, Flintshire, CH7 3AJ

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

- Digested blood is disposed of as per current arrangement for undigested blood.
- Odour must be prevented and minimised as far as practicable. All emission points (excluding the biogas boiler exhaust and emergency relief valves) shall be fitted to with suitable abatement to remove odour. Critical spares for odour control should be readily available and equipment should be regularly inspected/maintained to ensure it is in good working order.
- Odour emissions from the AD unit and ancillary equipment shall be monitored regularly (at least daily) by sniff testing. Results shall be recorded and prompt remedial measures shall be taken if issues are identified.
- Noise from the AD plant must be prevented and where this is not possible minimised. Potentially noisy operations should be avoided out of office hours.
- Personnell responsible for the operation of the AD plant must have a good understanding of the requirements of the site permit, this position statement and your written proposal.
- Any incidents that cause or have potential to cause a significant adverse off site impact shall be notified to Natural Resources Wales without delay. All odour complaints shall be investigated and findings reported.
- If Natural Resources Wales believes that the AD process is giving rise to or has potential to cause an offsite impact then the trial must stop and the AD plant taken out of operation without undue delay. The trial may recommence if the root cause of the impact is addressed and prevented from recurring (this is at the discretion of Natural Resources Wales and must be agreed in writing).
- Permit non compliance will be enforced as per normal arrangements.

Please do not hesitate to contact me should you wish to discuss the contents of this letter.

Yours sincerely



Stuart Ross

Regulatory Officer 1 (PPC/RSR) / Swyddog Rheoliadol 1 (RhDP/RhSY)

Cyfoeth Naturiol Cymru / Natural Resources Wales

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E-bost/E-mail

stuart.ross@cyfoethnaturiolcymru.gov.uk

stuart.ross@naturalresourceswales.gov.uk

Ross, Stuart

From: Ross, Stuart
Sent: 03 March 2014 17:13
To: 'Steven Van Der Keift'
Subject: RE: H2E AD Trial
Attachments: NRW 2014 03 03 2SFG AD Trial.pdf

Steve,

Please find attached a letter approving the AD trial at 2SFG Sandycroft.

As noted please let me know when the trial is due to start.

Regards

Stuart

From: Steven Van Der Keift [<mailto:Steven.VanDerKeift@2SFG.com>]
Sent: 24 February 2014 09:53
To: Ross, Stuart
Subject: H2E AD Trial

Stuart

Following our last meeting please find attached which confirms actions for the operation of the H2E AD trial plant. The items discussed have been put into the attached report and covers off the odour emission points and also leak containment. The trial plant is conveniently located regarding on site monitoring and keeping the area clean.

I have also attached a letter requesting the authorisation along the lines of T25 exemption.

Kind regards

Steve

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