

Natural Resources Wales permitting decisions

Variation

We have decided to issue the variation for **Ffridd Rasmus Landfill Areas 1 & 3** operated by **Gwynedd Council**.

The variation number is **EPR/GP3330BY/V006**

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist

Key issues of the decision

Extent of the site of the facility

As part of the variation, the operator was required to submit a new, clearer site plan including reference to all emission points. The new site plan has been included in the variation notice.

Biodiversity, Heritage, Landscape and Nature Conservation

In accordance with AQTAG014 'Guidance on identifying '*relevance*' for assessment under the Habitats Regulations for PPC installations with combustion processes', it was determined that the proposed variations to the permit would not need to undergo tests of the Habitats Regulations, due to the size of the individual combustion process being less than 5MW.

Environmental risk

The operator provided an air emissions screening assessment as part of their application. The initial submitted assessment compared Process Contribution (PC) values of Nitrogen Dioxide (NO₂) and Carbon Monoxide (CO) against their relevant environmental standards for both the existing gas flare and the

proposed gas micro turbine. A Schedule 5 Request for Further Information Notice was issued to the operator on 26th January 2017, requesting further work be carried out on the air emissions screening assessment, as follows:

1. In relation to Table 3.1 (Process Contribution from the landfill gas micro turbine) in Appendix D of your application pack (Air Quality Screening Assessment), the Process Contribution value for each of the three determinants is not the result of the multiplication of the relevant release rate by the relevant dispersion factor for that determinant. Please review the calculations and re-submit a corrected version of the document if necessary.

2. In relation to the new landfill gas micro turbine and the existing landfill gas flare, we need justification that Volatile Organic Compounds (VOCs) emissions to air are acceptable. For both the new landfill gas micro turbine and the landfill gas flare, please calculate Process Contribution values for VOCs in relation to the relevant environmental standards.

The operator responded to the Schedule 5 Notice on 2nd February 2017, providing an updated air emissions screening assessment with corrected calculations and PC values for VOCs. The statutory deadline for determining the application was therefore extended by 7 days from 20th March 2017 to 27th March 2017. The updated assessment was reviewed by NRW and it was determined that the PC of NO₂, VOC and CO emissions from both the landfill gas flare and micro turbine screened out as insignificant and no further assessment was required.

Raw materials

The proposed new gas micro turbine will have air bearings rather than conventional oil lubricated bearings. Consequently the generator package contains no oil, or any other fluids, and as such there is no requirement for any oil to be stored on site.

Emission limits

Having been queried by NRW, an email from the operator on 16th February 2017 confirms that the proposed emission limit for VOC from the micro turbine in the operator's initial application pack (Table 2, form C3) is incorrect. The operator confirms that the limit should be 1000mg/m³ in accordance with LFTGN08.

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail
Receipt of submission	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.
Applicable directives	All applicable European directives have been considered in the determination of the application.
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p> <p>See Key Issues</p>
Planning permission	We are satisfied that planning permission is in place and is appropriate for the relevant waste operation(s) applied for.
Biodiversity, Heritage, Landscape and Nature Conservation	See Key Issues
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>See Key Issues</p>
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the</p>

Aspect considered	Justification / Detail
	<p>facility.</p> <p>We consider that the emission limits included in the permit reflect the BAT for the installation.</p>
Raw materials	See Key Issues
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>For the proposed new gas micro turbine, the following substances have been identified as being emitted in significant quantities and ELVs or equivalent parameters or technical measures have been set for those substances.</p> <p>Oxides of Nitrogen 500mg/m³ CO 1400mg/m³ Total VOCs 1000mg/m³</p> <p>It is considered that the ELVs/equivalent parameters or technical measures described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured.</p> <p>See Key Issues</p>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>
Reporting	We have specified reporting in the permit.

Aspect considered	Justification / Detail
Environment management system	<p>There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.</p>
Relevant convictions	<p>Our Enforcement Database has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found.</p> <p>The operator satisfies the criteria in RGN 5 on Operator Competence.</p>