

Mr. Adam Stone
Sol Environment Ltd
Unit 5.3 Paintworks
Arnos Vale
Bristol
BS4 3EH

**Our Ref: PAN-016689
Other Ref: EPR/AB3233DW**

Date: 05 May 2022

Dear Mr. Stone,

We need more information about your application

Application Reference: PAN-016689

Operator: GP Biotec Ltd

Facility: Great Porthamel AD Plant, Talgarth, Brecon, Powys LD3 0DL

Thank you for your application, submitted to us on 20 January 2022. Unfortunately, we need to ask you for some more details before we can consider duly making your application. The additional information required is summarised below.

C3 Form

You have stated within Form C3 and within your Non-technical Summary that your application does not include any new Medium Combustion Plant, and that the proposed new boiler falls below the 1MWth threshold for Medium Combustion Plant Directive (MCPD). However, the Technical Data sheet for Viessman Vitorond 200 biogas boiler also included within your application indicates a range of Models, sized from 381kWth to 1285kWth input capacity. Please clarify which model of boiler is to be installed at the site and confirm the thermal input capacity. The capacity should be calculated in accordance with RGN02 guidance which states that in all cases, capacity refers to *potential* capacity or *design* capacity and not proposed production levels or throughput capacity. [RGN No. 2 Understanding the meaning of regulated facility - Appendices 1 and 2](#)

F1 Form

There is a discrepancy between the Opra Score and Opra Profile provided in support of your application (Score of 42), and our records which confirm the Opra Score for the site to be 72. There is no evidence that a revised Opra Profile for the site has been formally accepted by NRW, and therefore the current score of 72 should be used to calculate the application fee. Please submit a revised Opra Profile which reflects the currently approved Opra Score of 72,

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and re-submit a revised F1 Application form, along with additional application fee.

C2 Form

There are inconsistencies within the various site layout plans provided within your supporting information. Some drawings show multiple carbon filters, whilst none of the drawings clearly show the location of each new point source emission to atmosphere, as referenced within the application (i.e., location of emission points A7 and A8). Within your Non-technical Summary, you refer to the biogas upgrading plant utilising carbon filters (i.e., more than one). Please clarify the number of additional carbon filters to be added to the permit, and confirm their size and throughput capacity/ flow rates etc.

Your document titled "Installation Site Layout and New Boundary" shows a carbon filter to be located outside the installations red line boundary, whilst the plan included within your Supporting Document (shown on page 33) indicates point source emission A8 to be located outside of the red line boundary, whilst A7 does not point to any equipment / infrastructure. The drawing referenced "Biogas Upgrading Plant Area Layout" indicates an additional flare within the new biogas upgrading compound area, however this flare is not referenced within any other documentation and is also not shown in any of the other drawings submitted.

Please clarify the number and location of all new point source emissions to atmosphere to be incorporated as part of this variation application. If a new flare is to be added to the permit, you will need to update and re-submit your supporting documentation to reflect the additional emission point to atmosphere.

Please submit an updated site layout plan illustrating the location and reference numbers of each existing and proposed new point source emission to atmosphere. Please also note that the permitted site boundary line should be illustrated as a single continuous line around the perimeter of the site.

Your plans and supporting information should also identify all vents, including any passive / emergency / safety vents designed into the biogas upgrading plant, and confirm their locations on the site layout plan. For passive emission points such as breather vents and pressure relief valves, it is sufficient to just identify the release point, source, and briefly explain how during normal operations emissions from these points would be negligible from these sources.

Please clarify the operating envelop and configuration of all primary gas consumers (i.e., the two existing CHP units and the proposed new gas upgrading plant). Confirm if it is intended for all three gas consumers to be operational concurrently and if so anticipated gas yields and throughput for each consumer, or if any plant will remain in standby mode under normal operations.

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We require more information in relation to anticipated emissions from the proposed emission point A8: New biogas upgrading plant flue. Please provide a more detailed breakdown / itinerary of the gas composition from this emission point; confirming if the emission will be continuous or intermittent; emission exhaust gas flow rates / efflux velocity; temperature; stack height etc. and provide additional quantitative justification to demonstrate that each parameter can be screened out as insignificant, against relevant short-term PC and long-term PC Environmental Standards.

Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application and fee.

If you email or write to us, please quote the application reference **PAN-016689** on any correspondence and send it to the relevant address below. When we receive the missing items, we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions, please email me at Lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

cc. paul@gpbiotec.co.uk

We would refer you to the following standard guidance, which may be relevant in reviewing your application:

<https://naturalresources.wales/permits-and-permissions/environmental-permits/regulatory-guidance-notes-rgns/?lang=en>

[Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit)

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