

**Natural Resources Wales Permitting Decisions**

**Welsh Water Organic Energy  
(Cardiff) Limited  
(Tremorfa Anaerobic Digestion  
Facility)**

**Decision Document**

## Application for a Normal Variation

**The application number is: PAN-025645**

**The permit variation number is: EPR/AB3093CA/V004**

**The operator is: Welsh Water Organic Energy**

**The Installation is located at:** Tremorfa Anaerobic Digestion Facility, Tide Fields Road, Tremorfa, Cardiff, CF24 5SB

### 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.

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## Glossary of acronyms and definitions used in this document

AD- Anaerobic Digestion  
AEL - Associated emission level  
AMP - Accident management plan  
BAT - Best available techniques  
BRef – BAT Reference document (waste treatment)  
CHP - Combined heat and Power  
DAA - Directly associated activity  
EAL - Environment assessment level  
ELV - Emission limit value  
EPR - Environmental permitting regulation (2016)  
HRA - Habitats regulations assessment  
IED - Industrial emissions directive (2010)  
MCP - Medium Combustion Plant  
MCPD - Medium combustion plant directive  
PC - Process contribution  
PEC - Predicted environmental concentration  
SG - Specified generator  
WFD - Water framework directive

# 1. Executive summary

## 1.1. Application summary

Welsh Water Organic Energy Limited have applied to vary their permit for Tremorfa Anaerobic Digestion Facility to make the following changes:

- Addition of a backup biogas boiler (thermal input 1.53 MWth) – The boiler is to act as a backup for when the main combined heat and power (CHP) plant is offline due to maintenance or breakdown.
- Addition of waste accepted under the waste code 02 02 04, sludges from onsite effluent.
- Amendment to sewer discharge – Changes to the discharge points listed in the permit to correctly reflect the current set up at the site.

There will be an additional point source emission to air from the backup biogas boiler (listed as emission point A6 on the permit).

## 1.2. Our decision

We have decided to issue the variation for Tremorfa Anaerobic Digestion Facility) operated by Welsh Water Organic Energy (Cardiff) Limited.

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.

# 2. Receipt of the application

The application was received on 07/05/2024. In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- Confirmation if variation includes addition of liquid waste storage or not - the application was a partial resubmission of PAN-018508 which was returned as not duly made. PAN-018508 also included reference to the addition of liquid

waste storage. The applicant had confirmed in the not duly made response that this current application (PAN-025645) will not include the addition of new liquid waste storage.

- Confirmation that the new backup boiler is from another site (Five Fords WwTW Gas to Grid Facility Permit number EPR/AP3139FT) and when it was commissioned (see section 7.2 for more details).
- Air quality modelling files.
- Sewer discharge trade effluent consent.

A letter requesting this information was sent to the applicant on 21/11/2024. Upon receipt of this information, on 04/12/2024, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

### 3. Confidential information

The applicant made a claim for no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

### 4. Legislation

The variation will be issued, under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.
- An *medium combustion plant* as described in the Medium Combustion Plant Directive.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources

(SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

As the EPR regulator in Wales, NRW are required to determine any duly made permit application. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement<sup>1</sup> gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

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<sup>1</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)



## 5. Consultation

No consultation has been carried out on this application because the application falls under a normal variation and is not considered high public interest. This decision was made in accordance the Environment Permitting Regulations (EPR), our statutory Public Participation Statement<sup>2</sup> and our Regulatory Guidance.

## 6. Requests for information

Further information was requested during determination by way of a Schedule 5 Notice. We asked the applicant to provide further information relating to the status of existing improvement condition 4 (IC4) which concerns assessment of the priority hazardous substances in the water discharged to sewer.

The Schedule 5 Notice was sent on 14/02/2025 with a deadline for response of 10/03/2025. The response was provided on 10/03/2025 and the additional information supplied satisfied the requirements of the Schedule 5 Notice. Details on the response to this notice are discussed in section 10.2.

Several informal information requests were also made via email. These related to the further details on the new MCP;

- Clarification on the thermal input of the backup unit as the air impact assessment submitted stated a different thermal input to the figure given in the rest of the application.
- Confirmation on the NACE code (needed for schedule 8 of the permit).
- Details on any fuel share - the boiler was subject to fuel share of biogas or natural gas when it was located at Five Fords AD site but the application stated it was to run on biogas only at the Tremorfa site (section 7.2 for more details).

A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received.

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<sup>2</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

## 7. The Installation

### 7.1. The existing permitted activities

The regulated facility is currently an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- S5.4 Part A (1)(b)(i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only treatment is anaerobic digestion) by biological treatment

An installation may also comprise “directly associated activities”, which at this Installation include includes:

- Combined heat and power (CHP) Plant
- Emergency Flare

The regulated facility will also undertake waste operations including:

- Waste Storage (R13: Storage of waste pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where the waste is produced) and R3: Recycling. Reclamation of organic substances which are not used as solvents)

Together, these listed and directly associated activities comprise the Installation.

### 7.2. Changes to the installation

The variation will:

- Add a 1.53 MWth backup biomass boiler (to be used <500 hours per year). This will be added as an MCP activity under table S1.1.
- Add waste from sludges from on-site effluent treatment under the European waste code (EWC) 02 02 04 (Table S2.2).
- Amendments to the discharge to sewer in Table S3.3 to update details (emission point reference and location) of the sewer discharge points.

The biogas boiler had previously operated on another site (Five Fords WwTW Gas to Grid Facility, permit number EPR/AP3139FT). The unit, which is between 1- 5 MWth, has been confirmed to be operating before December 2018 and so would be considered an ‘existing MCP’ with a relevant compliance date of 1 January 2030.

However, as it is being added to a new site, as additional combustion capacity, we consider this MCP should be deemed a 'new MCP'. Therefore the relevant MCP conditions are applicable from date of permit issue.

The MCP will run on biogas from the from the main process which is classed as "other gaseous fuels" under MCPD. When the boiler was located at Five Fords it had been permitted to run on both biogas or natural gas, however the applicant had confirmed that the backup boiler will only run of biogas at this site.

The variation will also amend the discharge to sewer to reflect the actual location and arrangement on site. This is to incorporate corrections to the sewer discharge that were identified as being required during the BRef review (permit version V003, issued 2022). There are no operational changes to the sewer discharge and all process effluent is discharge under an existing trade effluent consent.

## **8. Operation of the installation**

### **8.1. Operator competence**

The applicant is the sole operator of the Installation. We are satisfied that the applicant is the person who will have control over the operation of the Installation after the variation is issued; and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator<sup>3</sup>.

### **8.2. Environmental Management System**

The site has an existing Environmental Management System (EMS) that meets the requirements for an EMS in our "How to comply with your environmental permit" guidance<sup>4</sup> and BAT Conclusion 1 of the Waste Treatment BRef.

The operation of the back boiler would be included in the site's management systems.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that

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<sup>3</sup> [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

<sup>4</sup> [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

### Accident management

The changes to the site proposed in the variations would not significantly alter the primary activity and associated activities of the site. As such the existing accident management plan would be sufficient to cover the risk of accidents and appropriate response without the need for any significant alteration.

## 8.3. Operating techniques

### Installation activities and assessment of Best Available Techniques

The applicant has described the proposed equipment and operating techniques (revised odour management plan) and compared these against the relevant Best Available Techniques conclusions (BATc) which for an installation of this type is Waste treatment Published 10<sup>th</sup> August 2018 <sup>5</sup>.

The new waste to be accepted under the waste code 02 02 04 is similar to existing waste accepted on site and therefore the existing management plans should be sufficient (see section 12.7).

We have reviewed the techniques proposed and consider them in line with them to represent BAT at this installation.

We have specified that the applicant must operate the permit in accordance with descriptions in the application. See section 12.2 of this document for more information on how we have incorporated the variation into the permit and how emission limit values have been set.

The back-up gas boiler is subject to MCPD controls and is incorporated into the permit through relevant permit conditions and tables S1.1 and S1.2A of the permit.

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<sup>5</sup> [COMMISSION IMPLEMENTING DECISION \(EU\) 2018/ 1147 - of 10 August 2018 - establishing best available techniques \(BAT\) conclusions for waste treatment, under Directive 2010/ 75/ EU of the European Parliament and of the Council - \(notified under document C\(2018\) 5070\)](#)

## 9. The site

### 9.1. Site Plan

The applicant has provided a an updated plan which we consider is satisfactory, showing the extent of the site of the facility and its emission points including the new emission point for the backup boiler (A6).

The update plan will be included in the permit and the operator will be required to carry on the permitted activities within the site boundary.

## 10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during are determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the applicant has provided an environmental risk assessment with the application which identifies and the sources of key risks from the variation, possible pathways and receptors. This risk assessment and further assessments provided by the applicant and/or completed by NRW will be discussed in further detail below.

### 10.1. Assessment of impact on air quality

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the stack and its impact on local air quality.

The applicant has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health in line with relevant guidance<sup>6</sup>. These assessments predict the potential effects on local air quality from the Installation's stack emission.

The air impact assessments, and the dispersion modelling has been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e., the maximum permitted emission rate.

We are in agreement with this approach. The assumptions underpinning the model have been checked and are reasonably precautionary. The applicant has calculated process contributions (PC) and predicted environmental concentrations (PEC) at locations within the immediate vicinity and all identified sensitive receptor locations. The modelling results for each pollutant will be discussed separately below. .

#### Sulphur Dioxide

Emissions of Sulphur dioxide was assessed against a short term critical level of 350 µg/m<sup>3</sup> (1 hour mean) and an critical level of 125 µg/m<sup>3</sup> (24 hour mean hourly). At sensitive receptor locations the maximum predicted short-term PC was <10 % of the short-term critical level ((2.6% of the 1 hour mean critical level and 2.6% of the 24 hour mean critical level). As the maximum PCs at the nearest sensitive receptors are below 10% of the relevant critical levels, the emissions screen out. Therefore, in accordance with the relevant guidance [Air emissions risk assessment for your environmental permit - GOV.UK](#) the impacts from SO<sub>2</sub> can be considered as insignificant.

#### Oxides of Nitrogen

Emissions of oxides of nitrogen (NO<sub>x</sub>) was assessed against a short-term critical level of 200 µg/m<sup>3</sup> (hourly) and µg/m<sup>3</sup> critical level of 40 µg/m<sup>3</sup> (annual).

The worst case short term (1 hour 99%tile) process contribution with detailed modelling had a maximum process contribution at the nearest sensitive receptor of 6.71 µg/m<sup>3</sup> or 3.4% of the short term critical level. As the short term process

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<sup>6</sup> [Air emissions risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](#)

contribution is <10% at the nearest sensitive receptor, the emissions from the proposed backup boiler screens out as not significant and no further assessment was required.

For long term (annual) emissions of NO<sub>x</sub>, the process contribution at nearest sensitive receptor was point source the process contribution under worst case scenario (which modelled for 8760 hours rather than 500 hours it would be limited to) was predicted to be 5.14 µg/m<sup>3</sup> which is 12.9% of the long term environment standards. The predicted environmental concentration using a background of 20.05 µg/m<sup>3</sup> \* was 63% of the long term critical level. Given that the highest concentration of NO<sub>x</sub> at the nearby sensitive receptors is less than 70% and the long term critical level and the modelling having been done on the assumption that the boiler would be running all year (at 8760 per year) rather than 500 maximum (thereby giving a worst case long term process contribution far higher than required), we are satisfied that emissions will not likely to lead to any significant impact.

*\* the applicant used a NO<sub>x</sub> background concentration from 2019. Given that this figure is higher than the most recent background (2022), we are satisfied that this represents worst case scenario.*

### Emission limits

We have decided that emission limits should be set for the parameters listed in the permit.

The following substances have been identified as being emitted:

- Oxides of Nitrogen (expressed as NO<sub>2</sub>)
- Sulphur dioxide
- Carbon Monoxide

We have not set emission limit for A6 as it is to operate less than 500 hours per year (as declared by the operator) and as such, under article 6 (8) of MCPD, it is exempt from the emission limits set out in MCPD

Based upon the information in the application and the measures that will be imposed by the permit we are satisfied that the appropriate measures will be in place to protect air quality for the environment and human health.

## **10.2. Emissions to Surface water sewer and foul sewer**

The variation proposal includes amendments to emissions to foul and surface water sewer. The site currently has two water discharges:

- S1 – Discharge of uncontaminated surface water to surface water sewer
- S2– Discharge of process water including washdown water from food reception hall and odour control to be discharged to sewer under a trade effluent consent.

During the BRef review of the permit (EPR/AB3093CA/V003) issued in 2021 it was identified that there was more information required on these discharges and their location was not correct. The applicant has submitted a request to correct these details.

There was also an existing improvement condition (IC4) for the operator to assess hazardous priority substances being discharged to sewer. As the variation was to amend the discharge to sewer and no record of it being completed a schedule 5 notice was sent to operator. The response to the Notice confirmed that the IC was still ongoing. As such the IC is still uncomplete but we have varied the discharge to correct the discharge point and monitoring point references in the table only and have not changed any other parameters for sewer discharge.

### **Emission limits**

There are no changes to emission limits and monitoring for the surface water sewer discharge (S1). The applicant will continue to monitor for ammoniacal nitrogen and oil/grease.

There are no changes to emission limits for discharge to sewer (S2). The existing improvement condition for an assessment on the potential discharge of hazardous priority species (put in at the BRef review in 2021) remains open.



The site discharges to sewer under a trade effluent consent to Cardiff waste water treatment works and there are no operational changes to the site that would change the sewer discharge. As such the variation will not change the risk of impact to the environment from the site.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of surface waters as a result of the sewer discharge.

### **10.3. Fugitive emissions**

Although the existing site has the potential for risk of fugitive emissions, the scope of the variation, (to add a waste similar to what is already accepted on site, amend and update details on sewer discharge and to add a new backup boiler) is not likely to increase the risk of fugitive emissions over the current site.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

### **10.4. Assessment of odour impact**

There are sensitive receptors within the vicinity of the installation.

Based on the details provided, we do not anticipate the variation will increase the risk of odour from the site for the following reasons;

- The biogas boiler is a backup unit that is only used when the main boiler is off line due to maintenance. The risk of odour is unlikely to be higher when this is used as backup compared to the main CHP unit.
- The new waste (sludges from on-site effluent treatment under the EWC 02 02 04) being added is similar to other waste types already accepted on site (see section 12.8.). The applicant had submitted an updated version of the odour management plan and this along with any other management plans should be sufficient to cover and minimise the risk of odour from this waste.

Condition 3.3.1 in the permit will also require that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour at the installation.

The applicant has supplied an updated version of their odour management plan. We assessed this against guidance H4 and BAT conclusions 10, 13 and 14 of the waste treatment BRef. We are satisfied that the updated odour management plan will be sufficient to minimise and deal with any fugitive emissions of odour from the site. This have been integrated into the permit through the operating techniques (table S1.2).

#### **10.5. Noise and vibration assessment**

Given that the variation is to add a new backup boiler and amendment to sewer, the changes to the site are unlikely to result in any change to risks associated of noise and vibration from the site.

### **11. Impact on National Site Network Sites, SSSIs and non-statutory sites**

The only potential impact pathway to any sites are from the air emissions from the backup boiler. The applicant has used the relevant screening distance criteria to identify relevant protected conservation sites which could be at risk from the proposal. A screening distance of 1 km for medium combustion units 1-2 MWth running of “Gas other than natural gas” was used in line with guidance <sup>7</sup>.

A full assessment of the variation application and its potential to affect the identified sites identified has been carried out as part of the permit determination process. National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

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<sup>7</sup> [Natural Resources Wales / What to do before you apply for a standalone Medium Combustion Plant \(MCP\) permit between 1 and less than 20 MW thermal input](#)

### **11.1. The National Site Network**

The following National Site Network sites are located within 1.0 km of the installation:

- Seven Estuary (SAC, SPA and Ramsar)

A Habitat Regulations Assessment (HRA) was completed to assess the potential to affect any of the sites identified. The project was screened for likelihood of significant effects and, is considered not likely to have a significant effect on any National Site Network site (as documented in section 3.2 of OGN 200 Form 1, or section 5 if applicable). As there a high degree of confidence that significant effects can be excluded, there was no requirement for the ANCB to be consulted.

The full assessment is available to view on the public register.

### **11.2. Sites of Special Scientific Interest (SSSI)**

The following SSSIs are located within 1 km of the installation:

- Seven Estuary

As a Section 28G Authority as defined in the Countryside Rights of Way Act 2000 permitting teams within NRW has a legal duty, under Section 28I of the Wildlife and Countryside Act 1981, to consult with NRW for formal advice when permitting an activity which has been determined to be likely to damage the features of a SSSI.

To determine if consultation is required, a SSSI Assessment was completed. The assessment concluded that the proposed permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest. The permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest because of conditions. Therefore, no consultation with NRW's protected sites advisors is required.

A copy of the assessment is available to view on the public register.

### **11.3. Non-statutory conservation sites**

The following relevant non-statutory sites re located within 1 km of the installation:

- Tidal Sidings
- Ocean Park South
- Cardiff Heliport Fields
- Pengam Moors

Under the worst case scenario the applicant had predicted that the process contribution of NO<sub>x</sub> was less than 100% of the critical level for both long term and short term impacts where the highest long term PC was 0.22% (0.0664 µg/m<sup>3</sup>) of the long term critical level and highest short term PC was 0.9% (0.675 µg/m<sup>3</sup>) of the short term critical level.

Emission of SO<sub>2</sub> (under the worst case scenario) screened out as insignificant being less than 100% of the critical level (0.0332 µg/m<sup>3</sup> or 0.33% of the critical level of SO<sub>2</sub>).

For local wildlife sites the screening threshold for process contribution is 100% of the critical level . As such even under worst case scenario of 8670 hours per year rather than the maximum permitted running hours of 500 hours per year, the impact of emissions from the proposal screen out as insignificant and no further assessment was required.

Based upon the information in the application we are satisfied that there will be no adverse impact to the non-statutory conservation sites identified.

## **12. The Permit Conditions**

### **12.1. Updating permit conditions during consolidation**

We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit.

The operator has agreed that the new conditions are acceptable.

## 12.2. Variation

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including additional information received as part of the determination process.

These descriptions have been specified in the Operating Techniques table (Table S1.2 in the permit).

## 12.3. Emission Limits

The Medium Combustion Plant Directive sets out the emission limits for a combustion plant with a thermal input of 1-50 MWth. Under article 6(8) MCPs which do not operate more than 500 operating hours per year, as a rolling average over a period of three years are exempt from compliance with the emission limit.

The operator had confirmed in their application (Form C3 Appendix 8) that the MCP will not operate more than 500 hours per year (which is set out in the permit through table S1.1, table S1.2A and condition 3.1.5). As such we have not set any emission limit for the backup boiler.

## 12.4. Monitoring

We have decided that monitoring should be carried out for the parameters listed in Schedule 3 of the permit using the methods and to the frequencies specified in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with the emissions limits in the permit.

For emissions to air from the new boiler the methods for periodic monitoring are in accordance with medium [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)). Monitoring frequencies have also been considered in line with the requirements of MCPD and BAT.

Based on the information in the application and the requirements set in the conditions of the permit we are satisfied that the monitoring techniques, personnel and equipment

employed by the Operator will have either MCERTS certification or MCERTS accreditation as appropriate.

### **12.5. Reporting**

We have specified the reporting requirements in Schedule 4 of the Permit to ensure data is reported to enable timely review by Natural Resources Wales to ensure compliance with permit conditions and to monitor the efficiency of material use and waste recovery at the installation.

### **12.6. Raw Materials and Fuel**

The backup boiler is fuelled on biogas (produced from the process on site) which is falls under “Gaseous fuels other than natural gas” in MCPD. We have specified limits and controls on the use of fuel for the backup boiler in table S1.1 of the permit, in line with the requirements of the Medium Combustion Plant Directive.

### **12.7. Waste Types**

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

The variation is to add the following waste code to the permit under table S2.2:

- 02 02 04 sludges from on-site effluent treatment

We are satisfied that the operator can accept these wastes for the following reason:

- The site is already permitted to accept waste of a similar nature include other waste under “02 02 Wastes from the preparation and processing of meat, fish and other foods of animal origin” and other wastes under EWC associated with sludge from on-site effluent treatment (02 06 03 and 02 05 02). As such the existing management plans should be sufficient to cover the addition of this waste and there is no increase in the risk associated with the new waste over what is already carried out on site. We made these decisions with respect to waste types in accordance with Waste classification Technical Guidance WM3 and waste treatment BRef.

### **12.8. Improvement conditions**

No improvement conditions have been set. As mentioned in section 10.2, the existing improvement condition (IC4) set in 2021 for assessment of possible priority hazardous materials to sewer remains open.

## **13. OPRA**

The OPRA score has not been changed as a result of this variation and remains as 106. This will form the basis for ongoing subsistence fee's.