ASGARD RENEWABLES LTD

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Environmental Permitting
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Nicola Williams
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05th February 2016

Dear Alys

Re: Environmental Permitting (England and Wales) Regulations 2010. Paragraph 4 of Part 1 of Schedule 5 notice dated 26th January 2016. Application ref: PAN000013 Anaerobic Digestion Plant, Asgard Renewables Limited, Unit 2 Crugmore Farm, Penparc, Cardigan.

Please see below the answers to the questions raised in the above Section 5 notice.

1. Fire Prevention and Mitigation Plan

Fire is a key risk associated with this activity.

Action: Please provide a fire prevention and mitigation plan which details the measures you will take in order to prevent / mitigate the risk of fire at the site. This plan must be produced in accordance with the Environment Agency's Technical Guidance Note 7.01 - Reducing fire risk at sites storing combustible materials.

Response – The Fire Prevention and Mitigation Plan is attached to this letter / email

2. Biogas and quality protocol

The application does not specify whether or not the biogas produced by the anaerobic digestion at the site will meet quality protocol, and therefore cease to be waste, before being combusted in the combined heat and power (CHP) engine on the site. If this is the case, we will not need to permit the combustion of the biogas in the CHP engine as a waste activity and therefore will not need to consider it (and the associated risks) as part of the determination of this permit application.

Action: Please confirm whether or not the biogas produced by the anaerobic digestion at the site will meet quality protocol and therefore cease to be waste before being combusted in the CHP engine.

Response: At this stage we do not have sufficient data on the quality of biogas to be produced, therefore cannot say whether or not it will meet the quality protocol. The biogas produced is from the Asgard Renewables AD plant and it will be combusted on the same site in CHP engines owned by Asgard Renewables Limited.

3. Site Plan

We require a site plan for the permit (if we are able to issue it) which shows the site, outlined in green, in relation to the surrounding areas and which shows the point source emissions (including the CHP engine exhaust stack, the CHP engine emergency flare and the biofilter) and the drainage points from the site.

Action: Please provide a site plan which meets the above criteria.

Response - Please see attached Annex I with this letter

4. Drainage

As part of our determination, we need to ensure that the storage and treatment of waste materials do not pose a risk to land, groundwater or surface water. The proposed drainage arrangements at the site are unclear in the application. It is important that the details of the site drainage are clear in order for us to be able to assess the potential impact of any discharges on the environment. Non-hazardous waste must be stored and treated on an impermeable surface with sealed drainage.

Action: please confirm the following, and provide any other information/diagrams relevant to these points in order to clarify the drainage arrangements.

a) Will all waste be stored and treated on an impermeable surface with sealed drainage? This includes the land on which the anaerobic digestion and digestate storage tanks are located.

Response - Yes all wastes will be stored and treated on an impermeable surface with sealed drainage. This does include the land on which the anaerobic digestion and digestate storage tanks are located. All wastes are received at the reception building which has a sealed drainage system, all leachate pumped back to the mixer tank.

b) Other than the anaerobic digestion and digestate storage tanks and the pasteuriser unit (in the tank farm area), will all waste be stored and treated within the reception building? If not, where else will waste be stored and/or treated?

Response – Yes other than the anaerobic digestion and digestate storage tanks and the pasteuriser unit (in the tank farm area), all waste will be stored and treated within the reception building.

c) Is the drainage of the apron / exterior of the reception building linked to the drainage of the tank farm area?

Response – No the drainage of the apron / exterior of the reception building is NOT linked to the drainage of the tank farm area the two areas are separate with distinct separate clean surface water discharges. The drainage for the apron of the reception building flows through a oil separator and is collected in an attenuation tank prior to discharge. The drainage in the tank farm is tested then manually pumped from a sump to the stream as required.

d) Could you please clarify the exact location and extent of the tank farm area?

Response - Please see diagram attached Annex II to this document

Where exactly is the bund which will surround the anaerobic digestion and digestate storage tanks (the bund which will contain the digesting materials / digestate, should a tank fail)?

Response - Please see diagram attached Annex II to this document

Is the pasteuriser unit within the bunded area?

Response – Yes the pasteuriser unit is within the bunded area.

Is the area of grasscrete (as indicated on document AR008a) inside or outside of the bund?

Response –The area of grasscrete (as indicated on document AR008a) is both inside and outside the bund. The site is located on an incline with the bunded tank farm at the bottom of the site. The grasscrete access road past the reception building to the digestate disposal point is outside the bund. The grasscrete road then continues down into the bunded tank farm area to what is marked as "the turning area"

The Environmental Risk Assessment provided with the application says 'vehicles not permitted in tank farm area' but the diagram in 'Process detail' shows a grasscrete area with a 'turning area' next to the tanks, which suggests that vehicles will use this area. Could you please clarify?

Response – The grasscrete area marked as "the turning area" is actually a throw back to a previous design when it was expected we would allow tankers into the area to collect digestate. Vehicles are not permitted in the tank farm area. The digestate discharge point is now at the rear of the reception building.

The Risk Assessment provided with the application says that the drainage of the tank farm area is a sealed system draining to a tank and catchpit, and that the 'tank is sampled daily and if non contaminated is pumped over the bund to the surface water drain'.

Will drainage only be pumped out after it's been tested, or will it be pumped out continuously and tested once a day?

Response – The drainage will only be pumped out if necessary and to the flow rate as approved in the ordinary Water Course Consent. This will not be a daily event except if the rain water levels in the tank farm have increased to a level that requires them to be reduced. The risk assessment has been amended to illustrate this point.

Will this drainage be discharged via an interceptor?

Response – No the drainage from the tank farm is not discharged via an interceptor, there are no oils or grease stored in the area and vehicle movements are minimal restricted to maintenance only.

I hope the above information is sufficient to allow determination of the permit, if not please contact us as soon as possible.

Yours sincerely

Russell Ward
Director
Asgard Renewables Limited