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Service Delivery Plan

Method Statement 3 – Technical Solution

3.2 Environmental Impact Control Plan

Method Statement 3.2 - *Environmental Impact Control Plan*

MS 3.2a - *Introduction*

The Beddington Lane Site and Villiers Road Site will be designed and operated to comply with relevant Legislation. Regular reviews of applicable and pending Legislation will be conducted to ensure that the Facilities and related operations remain compliant (subject to change in law provisions).

The main piece of Legislation with which the Key Facility must comply is the Waste Incineration Directive 2000/76/EC (WID), which has been superseded by the Industrial Emissions Directive 2010/75/EU (IED) and which will apply to new installations after 06/01/13. This will be transposed into UK law through the Environmental Permitting Regulations. Both the Key Facility and the Waste Transfer Station will operate under the terms of Environmental Permits. These Environmental Permits will set out the minimum control measures for emissions, including fugitive emissions, and compliance will be verified by the Environment Agency.

The Key Facility will produce air pollution control residues (APCR), which are classified as 'hazardous waste' due to their alkalinity. The transfer station at the Beddington Lane Site will handle hazardous household waste. Therefore the Hazardous Waste (England and Wales) Regulations 2005 SI 894 will apply to the facilities on the Beddington Lane Site.

Proven techniques will be applied to the Waste Transfer Station to minimise fugitive emissions. The existing control measures in place at the Waste Transfer Station will be retained until a full operational study has been completed. All improvements recommended by the study will be implemented.

The main regulatory tool will be an Environmental Permit that is required before the Contractor can operate the Facilities. The Environmental Permitting (England and Wales) Regulations 2010 SI 675 are therefore applicable to the Facilities.

Compliance with most Legislative and regulatory requirements will be covered by the Consents but the Contractor will put in place measures to comply with all relevant Legislation and relevant waste management regulations. The measures used for this purpose will be developed and managed using the corporate business management system (BMS) implemented by the Contractor in relation to the Sites.

A 'good neighbour' policy is implemented across the Facilities managed by the Contractor. The scheme has as its objective the minimisation of nuisance and the promotion of good community relations with our neighbours.

The Facilities will be designed, built and operated with due care for the minimisation of nuisance from the Contractor's (or its Sub-Contractors') activities.

For the Key Facility construction phase, the Contractor will require the Construction Sub-Contractor to register with the Considerate Constructors Scheme, the national initiative set up by the construction industry, and to conduct construction operations in compliance with the Codes of Considerate Practice.

Once operational the Facilities will be managed in accordance with the Contractor's BMS which is accredited to ISO14001 (Environmental Management) and pro-actively work to minimise the impact of the Facilities on the local environment and stakeholders. It is a requirement of the Contractor's BMS that practical improvement targets will be set, monitored and reviewed.



MS 3.2b - Emissions Control Systems

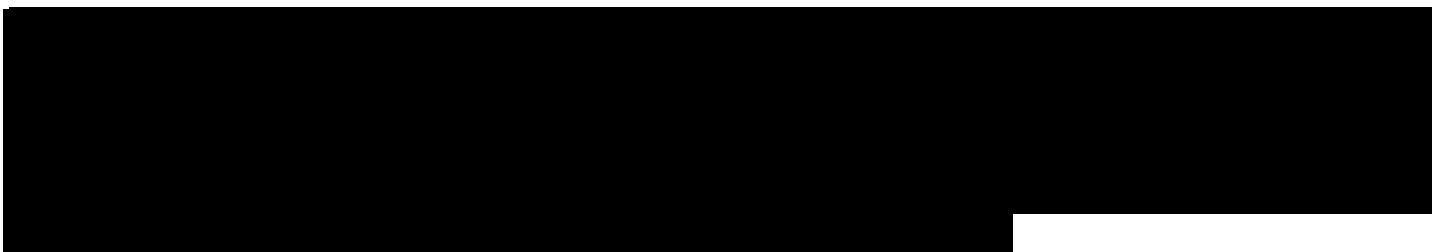
MS 3.2b.i - Key Facility

The initial stage of emission control is the minimisation of pollutant production through the application of good design and prudent operation.

The Key Facility will be equipped with a state of the art and proven flue gas treatment (FGT) system for the control of emissions to atmosphere and will minimise the emissions of pollutant species in order to maintain compliance with the conditions of the IED and the Environmental Permit.

Space has been allocated within the layout of the Key Facility to allow the retrofitting of a NO_x selective catalytic reduction system if required in the future.

The FGT system will include the use of lime, activated carbon and urea as consumable items and the recirculation of air pollution control residues (APCR) and bag filtration to achieve control of pollutant species.



a) *Monitoring of emissions*

It is a requirement for the Key Facility that emissions from the process will be adequately monitored by an accredited system. To this end a Continuous Emissions Monitoring Systems (CEMS) will be installed to record the composition of flue gases discharged from the FGT system to ensure that the specified emissions are monitored at half hourly intervals for the full duration of waste treatment operations at the Key Facility.

One full CEMS will be installed for each line of the Key Facility and an additional complete system will also be installed to provide for equipment redundancy in the event of failure in service. The results of all continuous monitoring will be made publically available through a dedicated website.

The specific systems and monitors to be used will be confirmed during the detailed design phase for the Key Facility but will be selected from a range of equipment provided that they are capable of satisfying the requirements of the Monitoring Certification Scheme (MCERTS) operated by the Environment Agency.

The monitoring of emissions from the Key Facility is required by the WID and the IED and implemented under the control of the Environmental Permit.

Historical data regarding emissions performance will be archived and secured in order to meet the requirements of Environmental Permit, MCERTS and contract obligations with regard to data validity, security and reporting.

For compliance with MCERTS, it will be necessary to perform regular calibrations of the CEMS to the standards established by BS EN 14181. This requires a three stage certification process for all monitors installed for the monitoring of emissions and will be subject to audit and review by the Environment Agency.

b) *Extractive monitoring*

In addition to the continuous monitoring of emissions, the Environmental Permit will specify a range of emissions for which extractive emissions testing must be completed by an independent accredited third party quarterly and biannually.

The provision of all monitoring and analytical services for the demonstration of emission compliance will be in accordance with the published standards and will be undertaken by appropriately qualified personnel in order to be considered valid.

MS 3.2c - *Monitoring of Parameters*

Data generated by the monitoring campaigns and systems will be used for trending analysis to monitor the performance of the Works and compliance with legislative and contractual requirements. This will include the use of key performance indicators (KPIs) for the reporting of plant performance against internal and external targets and objectives and as input data for the annual corporate responsibility report published by the Contractor.

MS 3.2c.i - *Emissions to Land and Water*

a) *Emissions to land*

[REDACTED]

b) Emissions to water

The Key Facility will be designed to consume all process waters generated on site under normal operating conditions and therefore will not normally require a process water discharge to sewer. However, trade effluent Consents are in place at the Beddington Lane Site for discharge to foul sewer which are now treated as an Environmental Permit. There will also be a connection to the surface water drainage system. A sample of any effluent discharged to sewer will be taken weekly and analysed for the determinands listed in the Environmental Permit. If effluent is tankered away for treatment, a sample of the tanker load will be taken and analysed for the required reception control parameters. An allowance for occasional sewer discharge and tanker removal has been included in the operational cost assessment for the Key Facility.

[REDACTED]

c) Residue monitoring requirements

[REDACTED]

[REDACTED]

[REDACTED]

MS 3.2d - Occupational Health Impacts

The guiding principles of occupational health and safety require that exposure to harmful substances or environments should be eliminated in the first place, mitigated only as a second choice and the use of personal protective equipment identified as a last resort.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

MS 3.2e - *Nuisance Control Procedures*

MS 3.2e.i - *Pest control procedures*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Key Facility bunker will be enclosed and under cover and the tipping hall will be designed so as to eliminate roosting points for birds. Measures will be implemented as required at the Villiers Road Site to deter birds. As a contingency measure the Contractor will use predatory birds to deter birds.

[REDACTED]

[REDACTED]

MS 3.2e.ii - *Procedures for containing and cleaning up waste spillages;*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MS 3.2e.iii - *Procedures for keeping the Facility clean, and litter free;*

a) *Facility cleaning*

[REDACTED]

b) *General cleaning*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

c) Litter controls

[REDACTED]

[REDACTED]

MS 3.2f - Ventilation and Noise Controls

MS 3.2f.i - Details of the ventilation, dust, noise and odour suppression equipment;

a) Noise controls.

[REDACTED]

[REDACTED]

[Redacted text block]

b) *Dust and odour controls.*

[Redacted text block]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

MS 3.2g - *Effluents*

MS 3.2g.i - *Measures to avoid contamination of watercourses or adjoining properties;*

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

MS 3.2g.ii - Control and monitoring of surface water discharge

[REDACTED]

Uncontaminated surface water will be discharged to public drains or local soakaways depending on the results of the EIA completed for the Planning Application and the Environmental Permit application.

[REDACTED]

[REDACTED]

MS 3.2g.iii - Details of any effluent treatment systems.

[REDACTED]

[REDACTED]

In normal operation, the Key Facility will be a zero discharge facility with the ability to re-use all produced process waters within the ash quenching systems. This re-use will include the discharge from continuous boiler water blow down operations. A dedicated settlement and holding tank will be provided to maximise the reuse of process water. Any discharge from the settlement tank will be sampled and monitored to ensure any periodic discharge complies with the requirements of the Environmental Permit.

[REDACTED]

All welfare facilities will have a direct connection to the public sewer or the adjacent sewage treatment plant.

An aqueous emission monitoring system will be installed which will comply with the requirements of the Environment Agency Technical Guidance Note M18 - Monitoring Discharges to Water and Sewer. The results of the emissions monitoring will be subject to audit by the Environment Agency under the Operator Monitoring Assessment (OMA) scheme.

MS 3.2h - *Lighting*

MS 3.2h.i - *Design assumptions and details of exterior lighting*

The Beddington Lane Site access and internal access roads and building will be illuminated during the hours of darkness in line with the requirements in the lighting plan attached to the Planning Permission to permit night time working (mainly during the winter period). The Key Facility building itself will also be illuminated resulting in a degree of visible light within the surrounding area.

[REDACTED]

Night time lighting at the Villiers Road Site will only be that required for security purposes and in accordance with agreed lighting plan approved by the Planning Authority for operational purposes.

[REDACTED]



MS 3.2i - *Exceptional cleaning*

The maintenance manager is responsible for compliance with cleanliness rules by Sub-Contractors. Specific cleaning tasks that require specialist equipment and/or staff will be sub-contracted.