Responses to questions raised by Facebook page moderators and sent on 27 September.

Bottom ash

What percentage of it will be metal?

- Due to the fuel coming from processing facilities there will be offsite source segregation and offsite fuel preparation which will help reduce the metals to near insignificant levels within the raw fuel. We will extract any other metals from the bottom ash using a magnetic separator on the bottom ash so that this valuable recylcate is recovered direct.

What percentage could go into building materials?

- All bottom ash is suitable for use as building aggregate after suitable offsite treatment. We are currently looking to work with a local firm for the removal the bottom ash and to use the reclaimed material as a secondary aggregate.

How much will there be from 200,000 tonnes of waste?

- This will vary plant by plant and will be ultimately determined by the Environmental Permit which will specify what waste can be processed, which will impact the total about of bottom ash produced. A facility such as this could produce up to 40,000 tonnes of bottom ash from a fuel source of 200,000.

Filtration systems

How good are they at filtering out emissions?

- The system will be using the best available technology, conforming with the latest 2019 requirements. We are designing the facility so not only would it meet current, but future standards, as detailed within the IED BREF update from July 2019. These emission limits are strictly controlled and assessed by NRW during the planning and permitting process. See here https://eippcb.jrc.ec.europa.eu/

What will be the percentage of all materials filtered out?

- Very very high. Due to the scale of the final emission from the stack, it is impossible to provide an exact figure, except that the limits of the exhaust gasses are typically measured in milligrams (thousandth of a gram) or nanograms (one billionth of a gram) per metre cubed. These figures and limits are all set and controlled by the environmental permit. and monitored to NRW permitted levels. For further details about specific limits for similar facilities see here https://ec.europa.eu/environment/industry/stationary/ied/legislation.htm
How much is emitted after process?

- While this question may sound simple, it can only be answered with a technical response. We would direct you to the emission limits section within the BREF Guidance and Industrial Emissions Directive IED. These amount to several thousand pages of limits and guidance detailing the limits and controls of the process and it is not right to simply summarise in a superficial answer. What we can say is that these EU driven permit limits will be included within the Environmental Permit issued and enforced by NRW.

Will it conform to guidelines during set up?

- Yes it will. This will be mandated from the commencement of operations through the Environmental Permit. This is a proven process so it will be able to meet these permitted emission limits from the commencement of operation.

Transport

How will the HGV’s be sealed? Will it be sealed bails, or will the whole truck be sealed?

- Fuel and ash residue trucks leaving the site will be completely sealed. Normal deliveries will be in sealed walking floor type trailers and will remain sealed until they are inside the reception building. The fuel will not be exposed during transport or delivery.

Emissions

How will we report on emissions?

- The reporting conditions are mandated by the Environmental Permit such that these are monitored on both continuously and on a quarterly basis, and available for inspection by the NRW at any time.

Why don’t we report PM2.5?

- PM2.5s form a tiny proportion of all the particulate (PM) emissions, the proportion is so small that it cannot be accurately given as a percentage of the total particulate emissions. We will monitor all particles (expressed as TPM) which will be monitored continuously by the plant and independently audited on a quarterly basis by the NRW. The Permit includes strict calibration of the continuous emission monitoring equipment and its specification to ensure that this equipment will meet a monitoring emissions to air, land and water (MCERTS) standard set by the UK government.

- What are the limits on all gasses and how close will this facility be? Emission levels are strictly controlled and monitored to ensure they remain within the Permitted limits and will reflect the most up to date standards applicable. The Regulations and Guidance applicable to control the plant and process are many hundreds of pages in length and detailed such that they cannot be paraphrased in a brief answer. The plant must reliably operate below these limits. Full limit information can be found in the following regulations:
How often will NRW check the emissions?

- All emissions will be continuously monitored using NRW approved continuous monitoring equipment and be checked quarterly by independently monitors.

Could you explain the four hour emission breach clause?

- It is a requirement for combustion plants such as the one proposed that management procedures to handle the rare occasions if emission levels are breached. The standard time specified in the Environmental Permit for the amount of time facilities can exceed the set emissions levels is four hours. Within this time frame we are expected to identify and rectify the issue that has caused the increase in emissions. Once identified, we determine whether or not it is possible to rectify the issue within the time frame or start the immediate, controlled shutdown process, in order to allow time for further assessment. We cannot go over the emissions levels for more than 4 hours.

- Within the Environmental Permit, it specifies the maximum number of hours that this facility can breach set levels of emissions per year. This is set at 60 hours and in each case, even if it is just a minute of exceeding the emissions standards, we have to produce a plausible emissions assessment report which outlines the cause, response and conclusion to each event. This report is then sent to NRW.

- In the event of continued breaches, even if they total less than the maximum 60 hours, NRW, as the regulatory body, can take action against this facility.

Waste

Can we clarify what is the official definition of Commercial and Industrial waste?

- The definition of commercial waste relates to the source of the waste not the material itself, and EU specific waste codes are then used - it is important to stress that no hazardous waste we will be brought to the site. Further details of the waste codes can be found later in this document and further details of the definition of the source of wastes can be found here:


- Friends of the Earth have developed a good interpretation of the regulations and give an accurate definition of the materials concerned. Their full report can be found here:

Friends of the Earth define Commercial and Industrial (C&I) waste as the controlled waste arising from the business sector. Generally coming from sources such as wholesalers, catering establishments, shops and offices. Our waste will be sourced from processing facilities which have worked to remove further recycled content, before being bailed and sent to this facility. The make up of what waste we can process will be outlined in the Environmental Permit, and it is in our interest to have clean, high calorific waste, as it will be more efficient to burn and produce electricity.

Operation

The site is on a flood plain, what would happen in the event of a flood, fire etc?

- The Environmental Permit will examine the impact of a flood or fire (as well as other unplanned incidents) on the safe operation of the facility. The NRW have strict guidance for what our facility needs to do as safeguards against these events. We (the applicant) have to detail our procedures to manage these impacts and these processes are reviewed and assessed, by NRW and the statutory consultees to ensure that the design and operation of the facility will have the strict controls and procedures to manage impacts, before the Environmental Permit is issued.

How will we check what is being burnt?

- The Environmental Permit strictly limits the types of material brought on to site such that each has a special European Waste Code (EWC Code) these are detailed within the Environmental Permit. This fuel will be supplied by an accredited fuel supplier (typically accredited to 9001) such that the fuel supply and delivery is strictly controlled to ensure it is only of the type acceptable to the facility. We can not provide the EWC Codes at the moment, not because we are trying to hide the type of waste we will take, but because they are yet to be defined within the Environmental Permit and are subject to approval by the regulatory bodies. The Scottish Environmental Protection Agency has a helpful guide to EWC codes, which can be found here:
  https://www.sepa.org.uk/media/163421/ewc_guidance.pdf

Will there be any organics in the waste, nappies or sanitary waste?

- It is not the intent to single source this material but conceivably there may be some in the feedstock within the other waste. The facility would be able to process this safely.

What is Cogen’s past safety record?

- All of the Cogen plants use the Best Available Technology and operate to the best European standards with no issues at any of our facilities. Cogen has never been reprimanded or fined by any regulatory body.
How often will the incinerator be turned off?

- This plant is designed to only have a single shut down once a year for routine maintenance. A set procedure for ensuring that the highest environmental standards are maintained during both shut down and start up will form part of the permit process.

How long will this project take to make a profit?

- This is a commercially sensitive question and we are not required to disclose this as part of the planning or permitting. What we can say is that typically, these sorts of plants recoup their investment anywhere between 12 and 15 years.

Community investment – what could be done

- CoGen and its supply chain have a history of supporting initiatives in local communities. As we are only at the pre application stage of development, we have not committed to any partnerships with local projects or groups and would consider suggestions.

Environment

Impact on migrating birds and bats

- We are doing studies to assess if there is any impact and these will be reviewed by the necessary statutory consultees during the determination of planning and permitting- we do not anticipate impacts but will comply with the mitigation recommended by the statutory consultees in this process.