Permit With Introductory Note

The Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2016

East Suffolk and North Essex NHS Foundation Trust
Colchester Hospital
Turner Road
Colchester
Essex
CO4 5JL

LAPPC Permit Ref no:
EP72/02/BA

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Permit issued by:
Environmental Protection Services
Ipswich Borough Council
Floor 3 West
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

Telephone: 01473 433115
Fax: 01473 433062
Website: www.ipswich.gov.uk
Email: environmentalprotection@ipswich.gov.uk
INTRODUCTORY NOTE

This introductory note does not form part of the permit

The following Permit is issued under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016, to operate a scheduled installation carrying out an activity, or activities covered by the description in section 1.2 and section 5.1 in Part 2 to Schedule 1 of the EP regulations, to the extent authorised by the Permit.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator should pay particular attention to relevant sections of the Secretary of State’s Process Guidance Note 01/03(12) and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EP Regulations provided that the request is reasonable.

Public Registers

Information relating to Permits, including the application, is available on public registers in accordance with the EP Regulations. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

Variations to the Permit

The Regulator may vary the permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log that forms part of this introductory note will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Transfer of the Permit or Part of the Permit

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a ‘fit and proper person’ as required by the EP Regulations.

Surrender of the Permit

Where an operator intends to cease the operation of an installation (in whole or in part) the Regulator should be informed in writing. Such notification must include the information specified in Regulation 24(3) of the EP Regulations.
Responsibility under Workplace Health and Safety Legislation

The permit is given in relation to the requirements of the EP Regulations. It must not be taken to replace any responsibilities an Operator may have under the workplace health and safety legislation.

Appeal Against Permit Conditions

Any person who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date of the Permit).

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows:

The Planning Inspectorate  
Environmental Appeals Administration  
Room 4/19 – Eagle Wing  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol, BS1 PN

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included:

a) A statement of the grounds of appeal;
b) A copy of any relevant application;
c) A copy of any relevant Permit;
d) A copy of any relevant correspondence between the person making the appeal and the Council;
e) A statement indicating whether the appellant wishes the appeal to be dealt with
   ▪ by a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
   ▪ by both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another’s statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the appropriate Secretary of State that this had been done.

▪ An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

▪ In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority to either vary any of these conditions or to add new conditions.
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Talking to us

Please quote the Permit Number if you contact the Regulator about this permit. To give a notification, the Operator should telephone 01473 433115 or any other number notified in writing by the Regulator for that purpose.

~ End of Introductory Note~
Permit

The Pollution Prevention and Control Act 1999
The Environmental Permitting (England and Wales) Regulations 2016

LAPPC Permit Ref No: EP72/02/BA

Ipswich Borough Council (hereinafter known as the Regulator) in exercise of its powers under Regulation 13 of The Environmental Permitting (England and Wales) Regulations 2016, hereby authorises:

East Suffolk and North Essex NHS Foundation Trust (hereinafter known as the Operator)

whose Registered Office is:

East Suffolk and North Essex NHS Foundation Trust
Colchester Hospital
Turner Road
Colchester
Essex
CO4 5JL

to operate an installation at:

The Energy Centre (Ipswich Hospital)
Woodbridge Road East
Ipswich
Suffolk
IP4 5PG

to the extent authorised by and subject to the conditions of this Permit.

Signature: ___________________________  Date:  Thursday 11th July 2019
Ben Atkinson
Public Protection Officer
The Authorised Officer for this purpose

Permit issued by:

Environmental Protection Services
Floor 3 West
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE

Telephone: 01473 433115
Fax: 01473 433062
Website: www.ipswich.gov.uk
Email: environmentalprotection@ipswich.gov.uk
OPERATING CONDITIONS

Process description and general information

This process is carried out by East Suffolk and North Essex NHS Foundation Trust, The Energy Centre (Ipswich Hospital), Woodbridge Road East, Ipswich, Suffolk, IP4 5PG.

The processes carried out on site generally comprise of the following activities:

Used Cooking Oil (UCO) is removed from site to be refined as liquid biofuel. The biofuel is then redelivered and reused as a primary fuel in six 400kw adapted diesel generators. The secondary fuel is conventional Red Diesel which is stored on site.

The generators are contained within an acoustic enclosure. Adjacent to the enclosure is an integrated fuel tank enclosure which stores the refined UCO. A third enclosure is used for operation, control and service equipment.

The generators exhaust pipes form on top of the generator enclosure into a single stack which is raised 15 metres from floor level.

Heat created by the generators is subsequently harvested for use in fuel conditioning, with any excess heat rejected by air blast radiators.

The attached site plans show the location, layout and orientation of the premises.

Conditions

Emission Limits, Monitoring and other Provisions

1. The operator shall use no other waste types in the small waste incineration plant than those set out in the process description.

2. The reference conditions for the emission limits are 273.15k and 101.3kPa and without correction for water vapour content unless otherwise stated.

3. There shall be no offensive odour beyond the site boundary.

4. All releases to air, other than condensed water vapour, shall be free from droplets and persistent visible emissions.

5. Monitoring of emissions shall be carried out according to the latest British, European or International Standard (BS, CEN or ISO). The latest standards can be found at the Source Testing Association or the Environment Agency Technical Guidance Notes (Monitoring) M1 and M2.

6. The emission limits, monitoring and other provisions for releases in Table 1 shall be complied with.
Table 1

<table>
<thead>
<tr>
<th>Substance</th>
<th>Emission limits/provisions</th>
<th>Type of monitoring</th>
<th>Monitoring frequency</th>
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<tr>
<td>Liquid fuel BS 2869:1998 class D – middle distillate fuels; for example gas oil</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plant new since 1 September 1995 mg/m³</td>
<td>200</td>
<td>Quantitative</td>
<td>Annual</td>
</tr>
<tr>
<td>Plant in operation before 1 September 1995 mg/m³</td>
<td>300</td>
<td>Indicative</td>
<td>Continuous annual</td>
</tr>
<tr>
<td>Gas oil must have a sulphur content not exceeding 0.1% by mass.</td>
<td>100</td>
<td>Sulphur content of liquid fuel is regulated by other arms of government</td>
<td></td>
</tr>
<tr>
<td>Oxygen</td>
<td>n/a</td>
<td>Quantitative</td>
<td>continuous</td>
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7. The operator shall keep a record of all inspections, tests and monitoring, and visual assessments. This record shall be kept on site for at least two years and should be made available to the regulator on request.

8. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit values. The operator shall state the provisional time and date of monitoring, pollutants to be tested and the methods to be used.

9. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of completion of the sampling.

10. Adverse results from any monitoring activity (both continuous and non-continuous) shall be investigated by the operator as soon as the monitoring data has been obtained. The operator shall:

   - identify the cause and take corrective action.
   - clearly record as much detail as possible regarding the cause and extent of the problem, and the remedial action taken.
   - re-test to demonstrate compliance as soon as possible; and
   - inform the regulator of the steps taken and the retest results.

11. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:

   - investigate and undertake remedial action immediately
   - adjust the process or activity to minimise those emissions; and
   - promptly record the events and action taken.

12. The regulator shall be informed without delay, whether or not there is related monitoring showing an adverse result:

   - if there is an emission that is likely to have an effect on the local community; or
   - in the event of the failure of key arrestment plant, for example, bag filtration plant or scrubber units.
13. The operator shall provide a list of key arrestment plant and should have a written procedure for dealing with its failure, in order to minimise any adverse effects.

14. All appropriate precautions shall be taken to minimise emissions during start-up and shut-down. The number of start-ups and shut-downs shall be kept to the minimum as far as is reasonably practicable.

15. The introduction of diluted air to achieve emission concentration limits shall not be permitted.

16. Dilution air may be added for waste gas cooling or improved dispersion where this is shown to be necessary because of the operation requirement, but this additional air will be discounted when determining the mass concentration of the pollutant in waste gases.

17. Compliance monitoring can be carried out either by use of a continuous moniter (CEM), or by a specific extractive test carried out at a frequency agreed with the regulator.

18. Where a CEM is used for compliance purposes it shall be periodically checked (calibrated) to ensure the readings being reported are correct.

19. Where non-continuous quantitative monitoring is required, the frequency may be varied. Where there is consistent compliance with emission limits, regulators may consider reducing the frequency. However, any significant process changes that might have affected the monitoring emission shall be taken into account in making the decision. When determining compliance, factors to consider include;

   - the variability of monitoring results, for example, results which range from 15-45 mg/m³, against an emission limit of 50 mg/m³ might not qualify for a reduction in monitoring.
   - the margin between the results and the emission limit, for example, results which range from 45-50 mg/m³ when the limit is 50 mg/m³ might not qualify for a reduction in monitoring.

20. Consistent compliance shall be demonstrated using the results from at least;

   - three or more monitoring exercises within two years; or
   - two or more monitoring exercises in one year supported by continuous monitoring.

21. Where a new or substantially changed process is being commissioned, or where emission levels are near to or approach the emission concentration limits, regulators should consider increasing the frequency of testing.

22. The operator shall ensure that relevant stacks or ducts are fitted with facilities for sampling which allow compliance with the sampling standards. Sampling points on new plant shall be designed to comply with the British or equivalent standards.

**Control Techniques**

23. Bulk storage tanks for liquid fuel shall wherever practicable be back vented to the delivery tank during filling. Where this is impracticable, displaced air vents shall be sited in such a
way as to prevent the arising of offensive odour, as perceived by the local enforcing authority at or beyond the site boundary.

24. Above-ground fuel storage tanks shall be completely contained by bunding which is impervious and resistant to the fuels in storage and capable of holding 110% of the capacity of all storage tanks within the bund.

25. Adequate provision shall be made for the containment of liquid and solid spillages. All spillages shall be cleared as soon as possible.

26. Stack heights shall be calculated using HMIP Technical Guidance Note D1 (D1). The emission limit in Process Guidance Note PG01/03(12) shall be used as the basis for chimney height construction calculation. An operator may choose to meet tighter emission limits in order to reduce stack height. The need to render harmless residual odour shall also be considered.

27. The stack target exit velocity shall be 15m/sec under normal operating conditions. An exception to the above is where wet arrestment is used as the abatement. To reduce the potential of droplet emissions from wet arrestment stack emissions a mist eliminator shall be used. Where a linear velocity of 9m/sec is exceeded in existing wet arrestment stack emissions, consideration shall be given to reducing this velocity as far as practicable to ensure such droplet entrainment and fall does not happen.

28. Stacks and ductworks shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

29. Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl, with the exception of a cone which may be necessary to increase the exit velocity or the emissions.

30. Management controls shall be in place to ensure effective control of emissions, including; proper management, proper use of equipment, supervision and training for process operators.

31. Spares and consumables – in particular, those subject to continual wear – shall be held on site, or should be available at short notice from guaranteed local suppliers, so that plant breakdowns can be rectified rapidly.

32. Operators shall put in place some form of structured environmental management system (EMS), whether by adopting published standards (ISO 14001 or the EU Eco Management and Audit Scheme [EMAS]) or by (EMS) tailored to the nature and size of the particular process.

33. All staff whose functions could impact on air emissions from the activity should receive appropriate training on those functions. This should include:

- awareness of their responsibilities under the permit;
- minimising emissions during start up and shut down;
- action to minimise emissions during abnormal conditions, or accidents or spillages that could, if not controlled, result in emissions.
34. Effective preventative maintenance shall be employed on all aspects of the activity including all plant, buildings and the equipment concerned with the control of emissions to air should be properly maintained. In particular; a written maintenance programme for all pollution control equipment, and a record of completed maintenance shall be made available for inspection by the regulator.

35. The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit.

~ End of permit ~
Appendix 1 – Site Location
Appendix 2 – Site Boundary