

**Carbon Capture Scotland Limited
Crofthead CO₂ Recovery & Dry Ice Production Facility
Permit Application**

PPC/A/5001793

DRAFT FOR CONSULTATION

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1 NON TECHNICAL SUMMARY OF DETERMINATION

Carbon Capture Scotland Limited CO₂ recovery and dry ice production facility at Crofthead is a CO₂ recovery plant which will take CO₂ arising from the biogas upgrade unit that is part of the adjacent AD plant and use this to form dry ice. The CO₂ would normally be vented to air following the purification of biogas to biomethane as part of the gas to grid process, this will now be captured and piped directly to the CO₂ recovery process.

The CO₂ recovery operation will operate 24/7 and be controlled by a SCADA system which can be accessed remotely at all times of day. The CO₂ will be compressed to purify the gas and achieve a liquified state. This will be stored in one of two 62000kg storage tanks which can also accept liquid CO₂ via tanker from other sources if required.

The dry ice production plant will only operate 08:00 to 16:00 Monday to Friday whilst the site is manned. This process takes the liquified CO₂ and enters machines at atmospheric pressure which causes the CO₂ to sublime into snow. This is then pelletised, sliced and packed ready for dispatch from the site.

The CO₂ recovery process is situated adjacent to the AD plant, just out-with the current site boundary, and will be operated by a third party. The existing AD plant permit has been varied to amend its site boundary and this new application details the process and will be issued as a new "part permit" to the new third party operator.

Glossary of terms

BAT - Best Available Techniques	AD – Anaerobic Digestion
CO - Coordinating Officer	COMAH – Control of Major Accidents and Hazards
ELV - Emission Limit Value	STU – Stationary Technical Unit
PPC – Pollution Prevention and Control (Scotland) Regulations 2012	DAA – Directly Associated Activity
CO ₂ - Carbon Dioxide	BUU – Biogas Upgrading Unit
SCADA - supervisory control and data acquisition	PRV – Pressure Release Valve

2 EXTERNAL CONSULTATION AND SEPA'S RESPONSE

Is Public Consultation Required -

Advertisements Check:	Date	Compliance with advertising requirements
Edinburgh Gazette	13/05/2022	Advert late but met requirements
Galloway Gazette	13/05/2022	Advert late but met requirements

Officer checking advert:

No. of responses received: None to date

Summary of responses and how they were taken into account during the determination:

N/A

Summary of responses withheld from the public register on request and how they were taken into account during the determination:

Is PPC Statutory Consultation Required –	
Food Standards Agency: Unlikely that there will be any unacceptable effects on the food chain	
Health Board: Nothing of public health concern	
Local Auth: No response	
Scottish Water: N/A no emissions to sewer	
Health and Safety Executive: N/A CO ₂ not currently defined as a dangerous substance under COMAH.	
Scottish Natural Heritage (PPC Regs consultation): N/A Minimal emissions and no nearby watercourses.	
Discretionary Consultation – N/A	
Enhanced SEPA public consultation – N/A	
‘Off-site’ Consultation – N/A	
Transboundary Consultation – N/A	
Public Participation Consultation - Yes	
<p>STATEMENT ON THE PUBLIC PARTICIPATION PROCESS The Pollution Prevention and Control (Public participation)(Scotland) Regulations 2005 requires that SEPA’s draft determination of this application be placed on SEPA’s website and public register and be subject to 28 days’ public consultation. The dates between which this consultation took place, the number of representations received and SEPA’s response to these are outlined below.</p>	
Date SEPA notified applicant of draft determination	
Date draft determination placed on SEPA’s Website	20 June 2022
Details of any other ‘appropriate means’ used to advertise the draft	
Date public consultation on draft permit opened	20 June 2022
Date public consultation on draft permit consultation closed	
Number of representations received to the consultation	
Date final determination placed on the SEPA’s Website	
Summary of responses and how they were taken into account during the determination:	

Summary of responses withheld from the public register on request and how they were taken into account during the determination:

Officer:
CO

3 ADMINISTRATIVE DETERMINATIONS

Determination of the Schedule 1 activity

This is a part permit to authorise a DAA to the AD plant in PPC/A/1180559 regulated under 5.4 Part A (b)(i)

Determination of the stationary technical unit to be permitted:

As above

Determination of directly associated activities:

CO₂ recovery process and dry ice production plant

Determination of 'site boundary'

Site boundary reflects that in PPC/A/1180559, the installation boundary for this permit only covers the CO₂ recovery process and dry ice production plant.

Officer: CO

4 INTRODUCTION AND BACKGROUND

4.1 Historical Background to the activity and variation

The existing AD plant permit was issued 4th November 2019 and the site has had excellent compliance since. The operation processes up to 100,750 tonnes of feedstocks per year in the form of farmyard manure, poultry litter, cattle slurry, energy crops, whey and distillery by-product liquid feeds.

This is a new application for a part permit for a CO₂ recovery process that will be technically connected and therefore directly associated with the existing adjacent AD plant but operated by a third party, therefore making the site a multi-operator site. The activity being carried out is not a PPC activity, however as this is technically connected to the AD plant, the activity classes as a Directly Associated Activity and is required to be regulated. For this reason, the site boundary has been extended on the existing AD plant permit (PPC/A/1180559) to account for the land the CO₂ recovery plant is sited on, and a new "part" or multi-operator permit issued to the third party operator to regulate the CO₂ recovery plant. Each permit will list the AD plant and all the DAAs associated with the whole site but will differentiate between the two operators using a site plan.

Pre-app discussions with the operator established that the CO₂ gas will not class as a waste product as this will meet a recognised standard (food standards, not regulated by SEPA). This part of the site will not be a Specified Waste Management Activity and will not require Fit and Proper Person assessment.

Pre-app discussions have also established that as the CO₂ will go through no chemical changes, this will not class as a PPC 4.2 activity.

4.2 Description of activity

Biogas produced by the adjacent AD plant is treated in a biogas upgrade unit to produce bio-methane suitable for export to the national grid. CO₂ is released from this process and was vented to atmosphere, however this will now be captured and transferred via an underground pipeline to the CO₂ recovery plant. The methane levels in the incoming gas will be monitored to ensure that the explosive limit is not reached.

During the initial high pressure stage, the CO₂ gas will be pressurised and cooled to induce condensation and reduce the water load in the gas and improve the efficiency of the next steps. This gas will then pass through an activated carbon filter dryer unit which will act as a deodoriser before going to the ambient air heated CO₂ evaporator to reduce the water content of the gas further. The dried gas is then liquified through a series of refrigerated compressor, condensers, and evaporators before a final purification step and transfer to storage in the liquid CO₂ tanks. There is capacity to recirculate CO₂ gas which does not meet the requirements through the evaporator to improve quality and any methane that is recovered from the CO₂ recovery process will be transferred back to the AD plant.

The dry ice process involves taking the liquid CO₂ from the tanks and when this is brought to atmospheric pressure it sublimates to "snow" which is pelletised into dry ice pellets and passed via a conveyor to a slicing machine. The slices of CO₂ are then packaged in specialist containers to store the dry ice for 3 to 7 days.

The plant also has the ability to accept liquid CO₂ by tanker to ensure adequate throughput for the dry ice process.

4.3 Outline details of the Variation applied for

N/A

4.4 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.

None

4.5 Identification of important and sensitive receptors

The site is located within a largely agricultural area, adjacent to the AD plant from which the CO₂ is sourced from. The closest receptor is a dairy farm approximately 150m from the site, and there are individual and small clusters of residences within approximately 1.8km.

There are no designated sites within a 2km radius of the site.

The CO₂ recovery plant is unlikely to lead to the production of additional odour, and noise modelling has shown there to be a low likelihood of adverse noise impact. There have been no odour or noise complaints regarding the existing AD plant.

5 KEY ENVIRONMENTAL ISSUES

5.1 Summary of significant environmental impacts

The main environmental impacts will come from the accidental release of CO₂, either as a gas, or someone encountering liquid or solid CO₂. The CO₂ itself would have been released to atmosphere prior to the introduction of the CO₂ recovery plant, and so overall is an environmental benefit, however if CO₂

is released within a confined space it can cause a risk to human health. Similarly, contact with liquid or solid CO₂ could potentially cause burns.

Whilst there will be storage of chemicals used in the process on site, these are being stored in small quantities, on concrete and within buildings.

The operator has carried out a risk assessment and has put measures in place to reduce the risk of incidents, these will be discussed in future sections.

5.2 Point Sources to Air

There is one CO₂ exhaust that will be used to vent the CO₂ released during the production of the final dry ice blocks which is an unavoidable part of the sublimation process. There will also be 4 pressure release valves on the tanks and associated processes which will be used in emergencies and during periods of unusual operation. The emissions from the PRVs may contain small quantities of trace gases from the AD process, however, this gas was previously vented to atmosphere from the Biogas Upgrading Unit (BUU) at the AD plant and the recovery of CO₂ from this process is an improvement on this. Any methane recovered from the process will be diverted back to the AD plant.

An air quality screening assessment was carried out, and as emissions of CO₂ are not associated with human health impacts there are no emission limits for the pollutant. There are no emission limits for CO₂ recovery in either the Waste Treatment BREF (the lead BREF for the associated AD plant) or in the Food, Drink and Milk BREF where CO₂ recovery is mentioned as a potential technology. The emissions are not considered to be significant and there will not be any emissions monitoring associated with this activity.

5.3 Point Source Emissions to Surface Water and Sewer

There will be a surface water discharge which will consist of clean surface water from the roofs and yard areas which will drain diffusely to a soakaway. It is proposed that domestic sewage will be managed via a septic tank and soakaway but will not be included within the site boundary and a separate application will be made for this. There are no other water discharges from the site.

5.4 Point Source Emissions to Groundwater

There will be no point source emissions to groundwater

5.5 Fugitive Emissions to Air

There will be 4 pressure release valves on the tanks and associated process which will be used in emergencies and during periods of unusual operation. The emissions from the PRVs may contain small quantities of trace gases from the AD process, however, this gas was previously vented to atmosphere from the Biogas Upgrading Unit (BUU) at the AD plant and the recovery of CO₂ from this process is an improvement on this.

The current arrangement at the BUU is that the emergency methane vent is linked to CO₂ vent, the CO₂ plant will be tied into the BUU prior to this to avoid contamination of the CO₂ with methane from the emergency vent, in the event of cross over, methane sensors located within the system will trip the automatic valve in the CO₂ delivery line and stop the flow of gas to the plant, whilst still allowing the BUU to operate.

There will be no routine fugitive emissions to air, emissions to air as a result of an event will be considered in "Accidents and their Consequences"

5.6 Fugitive Emissions to Water

There will be no routine fugitive emissions to water, emissions to water because of an event will be considered in "Accidents and their Consequences"

Standard soil and groundwater conditions have been inserted into the permit, including a requirement to carry out a 4 yearly systematic assessment of soil and groundwater protection measures, which SEPA would expect to include any underground pipework and containment measures. The operator has committed to carrying out 6 monthly integrity checks on the underground gas pipeline however as the pipeline is transporting gasses, there is not thought to be high risk to the soil and groundwater.

5.7 Odour

CO₂ gas itself has no odour, and whilst some emissions may contain small quantities of trace gases, these are likely to be very minor. The gas is also filtered prior to and during the CO₂ liquidation process to improve purity, this gas was previously vented directly to atmosphere with no abatement and therefore the site is highly unlikely to produce odour.

5.8 Management

This is a multi-operator site, with the AD plant being under different management than the CO₂ recovery plant. The plants are physically connected and a HAZID study has been carried out (summarised further in accidents and consequences) which considers potential hazards associated with the operation of both plants and the potential impacts on the CO₂ recovery plant. As a multi-operator site with technical connections to the AD plant, all actions were allocated to the relevant company.

The CO₂ recovery plant has an Environmental Management System in place and has provided a summary of this as part of the application. Some of the documents remain in draft to ensure that all the permit conditions are accounted for. The list of documents provided seems comprehensive and includes critical spares list, drainage maintenance, calibration, site induction and BAT assessment, among others. Copies of several relevant documents were submitted to support the application.

5.9 Raw Materials

There are very few raw materials used within the process. The liquid CO₂ will be stored within two 62000kg storage tanks and the solid dry ice stored in specialised palletised packaging within a building. The CO₂ will come both from the AD plant and will also be tankered to the site from external sources and a "Carboscan" scanner will be used to scan for impurities from incoming tankers to ensure that there is no contamination of the dry ice and that it can be sold as food grade CO₂.

Other raw materials on site will include diesel which will be stored in an integrally bunded 3000 litre tank, compressor oil of which approximately 13.5 litres will be used within the CO₂ recovery unit and 128.1 litres within the dry ice unit. This will be contained, and no spare material will be stored on site, but will be brought in when needed.

Activated Carbon will be used within carbon filters, it is estimated that this will require replacement every 2 years, and approximately 400kg of carbon is within the equipment. Again, this will be brought on site as required.

Glycol will be used within the refrigeration system, approximately 245kg stored within the equipment and topped up as required (10% loss per annum thought to be a worst case scenario)

Ammonia, will be used in the coolant systems and 283kg will be contained within the process equipment and topped up as required (again a 10% loss per annum is thought to be a worst case scenario)

Dryer agent (alumino-silicate gel), 320kg will be used within the machinery, no additional material will be stored on site, but brought on as required for maintenance.

5.10 Raw Materials Selection

The operator has committed to reviewing raw materials on at least an annual basis and selecting the lowest impact options where possible.

Ammonia and Glycol are being used as refrigerants in place of any CFC or HFC containing refrigerants.

5.11 Waste Minimisation Requirements

The operation itself is taking waste gas from the adjacent AD plant by capturing CO₂ and creating a product from gas which would have previously been vented to atmosphere.

Small quantities (0.6-1%) of methane may be within the initial CO₂ gas stream, this will be diverted back to the AD plant.

There is very little waste generated from the process and the operator has committed to reviewing waste production on at least an annual basis and selecting the lowest impact options where possible.

5.12 Water Use

There is no water use associated with the process itself, however water will be used during ad hoc cleaning as part of the site's maintenance program. The operator has committed to reviewing water use on at least an annual basis to identify where efficiencies can be made.

5.13 Waste Handling

Only small volumes of packaging waste will be generated as a result of the activity. There is very little waste to be stored on site, any waste materials generated during maintenance will be removed on the same day.

5.14 Waste Recovery or Disposal

As discussed in Waste Minimisation and Waste Handling above.

5.15 Energy

The site will be powered by the AD plant network and will benefit from the energy efficiency measures installed at the wider AD facility, including the electricity produced by the on site heat and power plant. The operator anticipates that the CO₂ recovery operation will consume approximately 1.32million kw a year, and the dry ice unit 130,000 kw a year, and has committed to monitoring energy usage and consideration of alternative energy sources at a future date. Standard SEPA resource utilisation conditions will be included in the permit to require a recording of data and systematic assessment.

5.16 Accidents and their Consequences

A HAZID study was carried out to establish the risks associated with the site and the safety features and management techniques required to ensure the risks are minimised. All actions were allocated to the relevant company. The operator has also developed an accident management plan which includes procedures to follow in the event of an incident.

The main issues surround loss of containment of CO₂, either through mechanical faults or human error. CO₂ detectors have been installed in the containers, and staff will wear personal gas monitors. There will be continuous forced ventilation in the containers, however this will be automatically ramped up if the CO₂ monitor's alarm.

The CO₂ tanks are connected in series, if one tank becomes full, the second will begin to fill and avoid spillage. There are pressure relief valves installed on the CO₂ tanks which will activate if the tanks become over-pressurised to prevent failure of vessels. The two CO₂ tanks also have level controllers which will cease filling and transfer to the second tank if the first becomes too full. There are also pressure sensors on the tanks which will stop the pumping of liquid CO₂ if pressure reaches over 19.5 bar.

If spillage of CO₂ does occur the surrounding area is impermeable, and the liquid CO₂ will quickly evaporate to a gas and there will be little environmental risk. The diesel is stored in a bunded tank, however if this is overfilled or becomes damaged, specialist spill kits are available including drain covers for surface water drains.

CO₂ is delivered to the plant via a booster fan on the pipeline, if this booster fails there is potential for a vacuum to form if the compressors are running. Vacuum sensors have been placed in the system and will stop the compressors if this occurs.

Power failure was another key issue identified in the HAZID and accident management plan, the site has an uninterruptable power supply battery back up system which will maintain power to the CO₂ recovery plant programmable logic controller.

The operator has committed to 6 monthly integrity checks of the underground CO₂ pipeline to ensure that the potential for leaks is kept to a minimum. As the contents of the underground pipework is gaseous, there is minimal risk for the underlying soils and groundwater.

Conditions have been inserted into the permit requiring any activation of the PRVs and any leakage of refrigerants to be considered an incident that should be reported to SEPA.

5.17 Noise

The applicant submitted a noise impact assessment as part of the application, a baseline environmental noise survey was carried out to establish existing noise levels at nearby sensitive receptors, and then a modelling exercise carried out to BS 4142 to predict the specific sound level from the CO₂ recovery plant. This was found to be 4dB below the existing day time background sound level, and 3dB below the existing night-time level. As the plant is situated next to the existing anaerobic digestion plant, and in an area with agricultural noise, it is considered that the activity will pose a low likelihood of adverse noise impact.

The standard conditions requiring a routine noise assessment and management plan will be included in the permit.

5.18 Monitoring

There will be no air emissions monitoring required by the permit, other than ensuring there are no visible emissions.

The operator will be monitoring the level of methane in the incoming gas stream and will ensure that the flow of gas will stop if the percentage of methane rises above 2%. As mentioned above, methane will be diverted back to the AD plant.

5.19 Closure

A decommissioning plan has been submitted with the permit application which seems comprehensive. Standard conditions will be included in the permit to require that this is updated on a regular basis.

5.20 Site Condition Report (and where relevant the baseline report)

Intrusive investigations had been carried out in 2018 to inform a baseline and site condition report for the initial PPC Part A application for Crofthead AD plant. The same baseline report has been submitted as part of this application, and a revised site condition report to reflect the new CO₂ recovery activities. Feedback from Contaminated land specialists advised that the soil and groundwater monitoring requirements in the Crofthead AD plant permit should be sufficient to cover the activities at the CO₂ recovery plant. As such, similar ground and soil monitoring conditions to those in the AD plant permit will be inserted into this permit.

It was noted that there is potential that the existing boreholes are not truly down gradient of the CO₂ recovery plant, however this has been highlighted to the operator and requested that there is a re-assessment of the monitoring plan under conditions 2.7.8 and 2.7.10 prior to the next round of monitoring to consider if an additional borehole is required downgradient of the new CO₂ plant. Monitoring dates will be kept the same as the AD plant permit so that these can be carried out as a joint exercise across the whole site.

5.21 Consideration of BAT

SEPA consider that this plant meets BAT, there are no specific BAT conclusions associated with this activity, but CO₂ recovery using a similar method is considered within the food and drink BREFs as an accepted technology. The current biogas upgrade to biomethane would usually involve the venting to atmosphere of CO₂ gas, whereas this takes this gas and creates a usable product.

6	OTHER LEGISLATION CONSIDERED
<i>Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994</i>	
Is there any possibility that the proposal will have any impact on site designated under the above legislation? No	
Justification: This was assessed during determination of the Crofthead AD plant permit, the CO ₂ recovery plant will reduce the overall emissions from the AD plant as the CO ₂ to be used was vented to atmosphere. There are no SSSI, SPA, or SAC within the 2km screening distance.	
Screening distance(s) used –2km	
Officer: CO	

7	ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH
How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account?	
N/A	
How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account?	
N/A	
Officer: CO	

8	DETAILS OF PERMIT
Do you propose placing any non standard conditions in the Permit? Yes, as this is now a multi-operator site conditions have been inserted to identify which area the permit applies. All conditions below have been taken from other permits.	
Do you propose making changes to existing text, tables or diagrams within the permit? N/A	
Outline of change: Inclusion of conditions to identify areas the permit applies to as this is a multi-operator permit.	
Details including justification:	

1.1.6 The permitted installation to which this permit applies (“the Permitted Installation) is:-

1.1.6.1 The parts of the installation which comprise the Directly Associated Activities described in Paragraphs 1.1.5.8 (1.1.5.8.1 to 1.1.5.8.5). The location of the permitted installation of the site in delineated in green on the site plan.

1.1.6.2 For the purposes of this permit, the Directly Associated Activities described in Paragraphs 1.1.5.8 (1.1.5.8.1 to 1.1.5.8.5) shall be known together as “the Permitted Activities”

The purpose of these conditions is to identify the areas of the site that this permit covers. Paragraphs 1.1.5.8.1 to 1.1.5.8.5 are the new CO₂ recovery and dry ice plant. These conditions also relate to a new site plan which will contain a red line to show the boundary of Crofthead AD plant site, and a green line to show the extent of the CO₂ recovery plant boundary.

Outline of change: Whilst standard Soil and groundwater monitoring conditions have been included in the permit, the monitoring requirements have been replicated from the AD plant site and the monitoring and reporting dates to match also.

Details including justification: This will allow for the sites to share the monitoring requirements and only carry out one round of monitoring.

Outline of change: Inclusion of Refrigerant/coolant leakage detection conditions

Details including justification: Refrigerants play an important role in the process, the condition below will require that there is leak detection and a refrigerant leak is treated as an incident as per condition 2.4.1. This condition was previously used in PPC/A/1198070.

3.7 Refrigerant/Coolant Leakage Detection

3.7.1 The refrigerant/coolant leak detection monitoring system shall be provided.

3.7.2 In the event of a leak being detected a signal shall activate warning audible and visual alarms and the refrigerant plant shall be automatically shut down.

3.7.3 Any leakage of refrigerant/coolant detected shall be recorded in accordance 2.4.1

Outline of change: Inclusion of PRV conditions

Details including justification: These are taken from the Crofthead AD plant permit to ensure consistent requirements for PRVs across both sites. Again, these require monitoring of the PRVs to ensure they are operating correctly, and any activation of a PRV should be treated as an incident.

3.9 Operation of process

3.9.1 The operator shall record the location and settings for all pressure valves (PRVs) associated with the process.

3.9.2 All PRVs shall be linked to an alarm system which shall be connected to telemetry 24 hours a day

3.9.3 Any activation of the PRVs will be regarded as an incident and must be reported to SEPA without delay. The time, date and duration of the incident will be automatically recorded.

9 EMISSION LIMIT VALUES OR EQUIVALENT TECHNICAL PARAMETERS/ MEASURES

Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters? No

Justification: Not a PPC activity and no ELVs set in the relevant BREFs or BAT conclusions. The main emission from the process will be CO₂ which would have been vented to atmosphere previously and not monitored.

10 PEER REVIEW

Has the determination and draft permit been Peer Reviewed? Yes

Name of Peer Reviewer and comments made: No comments

11 FINAL DETERMINATION

Issue of a Permit - Based on the information available at the time

Issue a Permit – Based on the information available at the time of the determination SEPA is satisfied that

- The applicant will be the person who will have control over the operation of the installation/mobile plant,
- The applicant will ensure that the installation/mobile plant is operated so as to comply with the conditions of the Permit,
- The applicant is a fit and proper person (specified waste management activities only),
- Planning permission for the activity is in force (specified waste management activities only),
- That the operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques.
- That no significant pollution should be caused.

Officer: CO

12 REFERENCES AND GUIDANCE

Waste Treatment BREF (08/2018)
 Food Drink and Milk BREF (12/2019)
 SEPA Soil and Groundwater monitoring technical guidance TG02
 Noise – summary guidance for PPC applicants
 PPC Part A Installations: Guide for applicants
 EIGA Carbon Dioxide food and beverages grade (doc 70/17)
 WRAP PAS 110:2014; Specification for whole digestate, separated liquor and separated fibre derived from the anaerobic digestion of source-segregated biodegradable materials