

Scottish Environment Protection Agency	Document Number	IED-DD-02
<b>Pollution Prevention and Control (Scotland) Regulations 2012</b> <b>Application for a Permit or Variation to a PPC Part A Permit Decision Document</b>	Issue Number	V2.0
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	Page Number	Page 1 of 12

**NHS Grampian  
Foresterhill Health Campus, Aberdeen**

**Permit Application**

**Permit Number PPC/A/1117278**

## Contents

1	Non-Technical Summary of Determination .....	3
2	External Consultation and SEPA's response .....	4
3	Administrative determinations .....	5
4	Introduction and Background .....	6
4.1	Historical Background to the activity and variation .....	6
4.2	Description of activity .....	6
4.3	Outline details of the Variation applied for .....	6
4.4	Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61 .....	6
4.5	Identification of important and sensitive receptors .....	6
5	Key Environmental Issues .....	6
5.1	Summary of significant environmental impacts .....	6
5.2	Emissions to Air .....	7
5.3	Emissions to Water .....	8
5.4	Noise .....	9
5.5	Resource Utilisation .....	9
5.6	Waste Management and Handling .....	9
5.7	Management of the site .....	9
5.8	Site Condition report .....	10
5.9	Monitoring .....	10
5.10	Consideration of BAT .....	10
6	Other Legislation Considered .....	10
7	Environmental Impact Assessment and COMAH .....	11
8	Details of the permit .....	11
9	Emission Limit Values or Equivalent Technical Parameters/Measures .....	11
10	Peer Review .....	12
11	Final Determination .....	12

### How to use this form

**Purpose of the document** - This document is intended to demonstrate transparency of the determination process to all interested parties. It should record all significant issues, decisions made, actions taken, and rationale for the approach adopted. It should be sufficiently detailed to demonstrate that all legal requirements were adhered to and provide the basis for defending any appeal.

**Language used** – You should use non-technical language as far as practicable, avoiding unexplained acronyms and technical terms. While aiming to be comprehensive, it must also be as brief as possible, consistent with the overriding need for clarity and accuracy. Officers should bear in mind that much of the document may be available publicly under the Freedom of Information Act etc.

**Timely recording of information** - Completion of the various forms should be done on a progressive basis rather than at the end of the process.

**Level of detail** - Officers should use their professional judgement as to the level of detail required which will depend on the complexity of the process. Officers must consider why the information is required and ensure appropriate detail is included. Each table is designed to be expanded as text is added and will obviously allow the insertion of additional rows where necessary.

**Applicability of any Section** - Do not delete whole sections of the form unless directed to do so. If something is not applicable to your determination, please record this on the form and give a justification if appropriate indicating you have considered the issue and not just missed it.

## 1 Non-Technical Summary of Determination

### Provide a non-technical summary of the process and determination

This is a PPC Permit for existing Combustion Plant housed in the Energy Centre, nearby to Aberdeen Royal Infirmary (ARI), which is located within the wider Foresterhill Health Campus, run by NHS Grampian. The Energy Centre combusts natural gas (fossil methane) in a Combined Heat and Power Plant (CHP), which provides both power in the form of electricity and heat in the form of steam to the wider health campus.

The Combustion Plant has been determined to be to the Best Available Techniques (BAT) standard, in terms of its design, construction, operation and maintenance. Emissions to air from the Energy Centre have not been impacting on local Air Quality Standards (AQS) for the protection of human health. Furthermore, there have been no complaints from staff, patients and nearby residents of any noise or odour issues, associated with the plant.

The permit also applies to other smaller combustion plant around the site, including standby generators which may be used in the event of an interruption to the gas supply. At the time of plant design and subsequent permit application, emissions modelling was conducted to confirm compliance with AQS and to determine the correct height of the stack (chimney) for plume dilution and dispersal.

The determination of this application, originally made in late 2018, has taken much longer than normal to complete. There are several reasons for this. Firstly, the coronavirus pandemic in 2020 caused a delay during staff lockdown and resourcing. Secondly, the major cyber-attack on SEPA in 2021 resulted in the loss of many records. Later in 2022, efforts were made to recover some files, including those associated with applications and permits, including this one. Thirdly, not all data and records relating to this application were recovered, meaning some further work had to be undertaken to reassemble information. Lastly, there have been recent changes to combustion plant emission limits to air, in the form of new Emission Limit Values (ELV) to air from Medium Combustion Plant (MCP). An early draft permit had therefore to be re-evaluated in the light of these changes.

### Glossary of Terms

ACC – Aberdeen City Council  
AQIA – Air Quality Impact Assessment  
AQMA – Air Quality Management Area  
AQMP – Air Quality Management Plan  
AQS – Air Quality Standard  
ARI – Aberdeen Royal Infirmary  
BAT - Best Available Techniques  
BAT-C – Best Available Technique Conclusions  
BREF – Best Available Techniques Reference Document  
CHP – Combined Heat & Power  
EC – Energy Centre  
ELV – Emission Limit Value  
ETS – Emissions Trading Scheme  
FHC – Foresterhill Health Campus  
HVO – Hydrotreated Vegetable Oil  
LAQM – Local Air Quality Management  
LCP – Large Combustion Plant  
MCP – Medium Combustion Plant  
MWth – Megawatts Thermal  
NHS – National Health Service  
NHSG – NHS Grampian  
NO<sub>x</sub> – Nitrogen Oxides expressed as NO<sub>2</sub>  
PM Particulate Matter (PM<sub>10</sub> & PM<sub>2.5</sub> microns)  
PPC – Pollution Prevention and Control

## 2 External Consultation and SEPA's Response

### Guidance:

In general, Public Consultation, PPC Statutory Consultation and the Public Participation Process is required if you are processing a new permit or a substantial variation to a permit. Further information on this is provided in the interim procedure for the Part A process that you are determining.

### Is Public Consultation Required?

(If no, delete rows below)

Yes

Advertisement Check:	Date	Compliance with advertising requirements
Edinburgh Gazette	10.12.2013	Deemed compliant
Aberdeen Citizen	11.12.2013	Deemed compliant

Officer Checking advert: [REDACTED]

### No of responses received

There are no records of any responses being received to the two advertisements made in December 2013.

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

No responses were received (or if so, records were lost to the cyberattack).

### Summary of responses withheld from the Public Register on request and how they were taken into account during the determination:

As above.

### Is PPC Statutory Consultation Required?

(If no, delete rows below)

Yes

Food Standards Agency:	Consultation letter sent to FSA on 22.11.2013.
Health Board:	Consultation letter sent to NHS Grampian on 22.11.2013.
Local Authority:	Consultation letter sent to Aberdeen City Council on 22.11.2013.
Scottish Water:	Consultation letter sent to Scottish Water on 22.11.2013.
NatureScot:	Consultation letter sent to Scottish Natural Heritage on 22.11.2013.

### Discretionary Consultation required?

(If yes, provide justification and details below, otherwise delete row)

Yes

A more recent consultation was undertaken with Aberdeen City Council officials in Air Quality & Environmental Health on 6 February 2023 to understand current air quality levels around the hospital complex and to determine if the Energy Centre was presently contributing to any adverse polluting impacts. There were none identified but refer to Section 5.2 below (near the end) for more details.

### Enhanced SEPA Consultation required?

No

### "Off-site" Consultation required?

No

### Transboundary Consultation required?

No

### Is Public Participation Consultation required?

(If yes, provide justification and details below)

Yes

### 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:

<b>Date SEPA notified applicant of draft determination</b>	18/09/2025
<b>Date draft determination placed on SEPA's Website</b>	18/09/2025
<b>Details of any other 'appropriate means' used to advertise the draft</b> Seek advice from the communications department	
<b>Date public consultation on draft permit opened</b>	18/09/2025
<b>Date public consultation on draft permit closed</b>	
<b>Number of representations received to the consultation</b>	
<b>Date final determination placed on SEPA's Website</b>	
<b>Summary of responses and how they were taken into account during the determination:</b>	
<b>Summary of responses withheld from the Public Register on request and how they were taken into account during the determination:</b>	
<b>REMOVE THIS BOX FROM ANY VERSION OF THIS DOCUMENT TO BE PLACED ON THE WEBSITE OR PUBLIC REGISTER. RETAIN IN THE VERSION FOR THE WORKING FILE.</b>	
<b>Officer:</b>	CO

<b>3 Administrative Determinations</b>	
<b>Determination of the Schedule 1 Activity</b>	
The main Schedule 1 Activity is the burning of fuels in a combustion system with a rated thermal input of 50 MW or more as per the PPC 2012 Regulations and Schedule 1, Part 1, Chapter 1, Section 1 Combustion Part A.	
<b>Determination of the Stationary Technical Unit to be Permitted</b>	
The main Stationary Technical Unit is the Foresterhill Health Campus 'Energy Centre', a modern enclosed building which houses 5 combustion units: a CHP, a Biomass Boiler, and 3 Dual Fuel Boilers. All are technically separate and can be operated independently of one another. The total capacity of the 5 units in the Energy Centre is 58.83 MW. There are smaller stationary units located throughout the site.	
<b>Determination of Directly Associated Activities</b>	
Other Directly Associated Activities (DAA) have been determined in relation to the Energy Centre and include the storage of standby diesel fuel, the storage of burned biomass ash, the boiler blowdown discharge to sewer, and other activities which are identified in relevant conditions and tables within the permit with respect to the recording and reporting of their information to demonstrate compliance.	
<b>Determination of Site Boundary</b>	
A revised Site Boundary Plan has been attached to the Permit. Within the overall boundary are certain identified areas which have been excluded, as they are not owned and operated by NHS Grampian. The Plan includes the main Foresterhill Energy Centre and the more distant Cornhill combustion units. The Site Boundary includes all the lesser sized combustion units and the standby electrical generators. The actual locations of these smaller units are shown on other plans attached to the Permit.	
<b>Officer</b>	CO

<b>4 Introduction and Background</b>	
<b>4.1 Historical Background to the Activity or Variation</b>	
<p>In 2013 a PPC Application was made to SEPA for a new Energy Centre at Grampian Health Board's Foresterhill Health Campus at Aberdeen, which comprises Aberdeen Royal Infirmary (ARI), an Accident and Emergency Department (A&amp;E), a Dental School and a variety of other specialist services. A draft Permit was prepared in 2016 but additional changes at the site resulted in the draft still being unfinished throughout 2018 and 2019. The global covid pandemic occurred in early 2020 with subsequent population lockdowns affecting national life. In late 2020 SEPA was hit by a harmful cyberattack, which destroyed much data, severely affecting the Agency's digital capability throughout 2021, and from which the organisation only started recovering in early 2022. Internal SEPA staff and team changes meant some Permit documentation was only recovered in early 2023 for continued progression. Further structural changes at the hospital complex, and a change to certain combustion emissions standards to air, necessarily resulted in a detailed revision of the 2019 draft permit. Since 2013, the Energy Centre has been operating steadily, with no detectable impacts on ambient air quality, as suggested later in Section 5 of this document.</p>	
<b>4.2 Description of Activity</b>	
<p>The Energy Centre comprises five elements, all housed within one large building. A Combined Heat and Power ('CHP') plant burns mains supplied natural gas. The CHP comprises a gas turbine and a waste heat recovery boiler, in which the turbine is connected to an electrical generator which provides power for the hospital, and in which the waste heat from the turbine's exhaust is directed to a boiler which raises steam for heating for the hospital. A separate Biomass Boiler burns waste woodchip to raise further steam. In addition, there are three dual fuel boilers which combust natural gas or fuel oil (diesel) for extra steam when the need arises. All five elements can be operated independently but, for efficiency, the CHP runs continuously, as does the Biomass Boiler for much of the time, with one or more of the three boilers coming online when demand rises (for example in winter). The steam is piped out from the Energy Centre to provide heating throughout the hospital; hot water is produced by passing some steam through local heat exchangers near point-of-use.</p> <p>Further combustion activities on a smaller scale take place elsewhere in the Foresterhill Health Campus. These include two sizeable boilers in the Cornhill part of the site and a variety of others which serve dedicated buildings and functions around the hospital complex. In addition to this, there are many standby generators located around the campus which can provide electricity to critical buildings and services in the event of an emergency with the mains power supply. Information and details about these other boilers and generators are provided in Section 5.2 below.</p>	
<b>4.3 Outline Details of the Variation Applied For</b>	
Not applicable	
<b>4.4 Guidance/Directions Issued to SEPA by the Scottish Ministers Under Reg 60 or 61</b>	
None	
<b>4.5 Identification of Important and Sensitive Receptors</b>	
<p>With respect to non-human receptors, the nearest nature designated site is the River Dee Special Area of Conservation (SAC) which, at its closest point to the site, is about 3 km to the south-east. With respect to human receptors, all the combustion units are sited and operated in a large and busy hospital complex (including A&amp;E), which serves the wide Grampian community, including sensitive patients with lung conditions who depend on good clean air. In this respect, there is self-evident awareness in the operator of their responsibilities in maintaining good air quality around the campus through the proper operation and maintenance of all their combustion appliances.</p>	
<b>Officer:</b>	CO

<b>5 Key Environmental Issues</b>		
<b>5.1 Summary of Significant Environmental Impacts</b>		
Part A Permit Application or Variation Dec. Doc (sec 2 technical)	Form: IED-DD-02	Page no: 6 of 12



The principle environmental impact is to air and atmosphere as the main activity is combustion of fuel for energy provision. There are no other significant point sources to other environmental media.

## 5.2 Emissions to Air

### Point Source emission to air:

The Energy Centre is made up of the following five elements in more detail. The CHP Boiler unit (S01) is the largest of the five with a net rated thermal capacity of 19.78 MWth (a 'design maximum'). This would include both the electrical power produced and the thermal energy (the megawatt is a large unit of power, being 1 million Watts, or 1 million Joules per second of energy generation). The Biomass Boiler (S02) has a rated thermal capacity of 8.56 MWth, in terms of the maximum heat it can produce. The three Dual Fuel Boilers are labelled A, B and C: Boilers A (S03) and B (S04) each have a rated thermal capacity of 11.23 MWth, with smaller Boiler C (S05) at 8.03 MWth.

The total thermal capacity of the Energy Centre is 58.83 MW. Each of the five combustion elements can be operated independently: there is no technical connection between any of them, in the sense that the operation of any one of them is dependent on the operation of another. The CHP Boiler does not have a supplementary firing capability for the boiler itself, should the gas turbine be off-line. The individual parts of the CHP are therefore not 'aggregated' in this case to constitute one 'Large Combustion Plant', which is defined as a plant with a capacity of 50 MWth or more.

Other sizeable combustion units within the wider Foresterhill Health Campus include two remaining boiler units associated with the former Cornhill Hospital. Cornhill Main Boiler 1 (S60) has a capacity of 2.43 MWth, as does Cornhill Main Boiler 3 (S62). These two combustion units, plus the five within the main Energy Centre comprise all plant greater than 1 MWth capacity and are listed in the first table in Appendix 1. The 'Source ID' numbers (eg S01) are those of NHS Grampian and are marked against each combustion unit within the table.

There are a significant number of smaller combustion units located throughout the campus, of less than 1 MWth in size (each with individual Source ID numbers) and these are listed in the second table in Appendix 2. There are currently 27 of these in number, and most of these are small boilers providing point source heating and hot water for specific buildings within the campus.

Finally, there are a many emergency electrical standby generators, positioned throughout the site and designed to serve dedicated parts of the hospital complex, should the main grid-supplied power fail. There are currently 29 of these stand-alone generators, of sizes ranging from 0.03 MW (a small portable petrol generator) to 3.37 MW (the ECC Generator - S32). Of significance, the Energy Centre Generator (S36 at 2.94 MW) is used to supply electrical power to the centre itself, in the event of an interruption to supply. The standby generators, which combust diesel or, more recently, hydrotreated vegetable oil (HVO), are listed in the third table in Appendix 1.

As the largest combustion unit on site, the CHP Boiler Unit (S01) is of capacity 19.78 MW, and the sum of all the combustion units in the Energy Centre is not aggregated and remains below 50 MW, the Emission Limit Values (ELV) which apply to Large Combustion Plant (LCP) greater than 50 MW do not apply. Instead, the ELV pertaining to Medium Combustion Plant (MCP) which applies to units of between 1 and 50 MW applies to qualifying combustion plant units at this site.

The five combustion units within the Energy Centre and the two at Cornhill (Appendix 1 Table 1), which constitute the largest units on the campus and which are greater than 1 MW, are therefore subject to MCP ELV. All those units less than 1 MW (Appendix 1 Table 2) are not and indeed are so small as to have no separate ELV which apply to them which SEPA enforces.

With respect to the emergency standby generators (Appendix 1 Table 3) a significant proportion are of capacity greater than 1 MW. However, they operate under a 'limited hours' exemption under MCP, which applies to less than 500 operating hours per annum (equivalent to 21 days). These units are subject to periodic but regular inspection and testing regimes, where they are operated for typically up to 30 minutes at a time, but they are very unlikely to operate individually for more than 500 hours in any given

year, unless the grid outage was very prolonged. This is highly unlikely too, as the hospital complex is guaranteed a certain high level of supply security, due to its sensitive nature. Therefore, there are no MCP numeric limits for emissions from these standby generators. However, there is a condition in the permit which relates to the satisfactory maintenance of these units to manufacturers' recommendations.

The following ELV are being applied to the Energy Centre and, as the MCP limits depend on the nature of the combustion units and the type of fuel being combusted, there are three different sets of values. For the CHP unit (gas turbine plus waste heat recovery boiler) there is a single limit for NO<sub>x</sub> (sum of nitrogen dioxide NO<sub>2</sub> and nitric oxide NO) of 150 mg/Nm<sup>3</sup> for burning natural gas. For the Biomass Steam Boiler combusting waste woodchip the limit for NO<sub>x</sub> is 650 mg/Nm<sup>3</sup>, for SO<sub>2</sub> (sulphur dioxide) 200 mg/Nm<sup>3</sup>, and for particulate matter (PM) 50 mg/Nm<sup>3</sup>. Biomass as a fuel is composed of a more complex carbon mix, being of natural origin, but is ultimately more sustainable than burning fossil carbon, and the biomass unit has emissions abatement installed in the form of electrostatic precipitators ('ESP'). Finally, each of the Dual Fuel Boilers has a limit of 200 mg/Nm<sup>3</sup> for NO<sub>x</sub> when burning natural gas, and the same limit of 200 mg/Nm<sup>3</sup> for NO<sub>x</sub> when burning fuel oil (standby diesel). There are no limits for carbon monoxide (CO). Natural gas (fossil methane) is the 'cleanest' of the fossil fuels and its combustion requires no abatement, but it does produce carbon dioxide (CO<sub>2</sub>) and the site is subject to the UK Emissions Trading Scheme (UK ETS) for greenhouse gas emissions reductions.

At the time of permit application, the submitted air dispersion modelling report indicated there would be no breaches of local Air Quality Standards (AQS) for any parameters due to emissions from the new plant. The Air Quality Impact Assessment (AQIA) concluded there would be no impact. This is corroborated by further and more recent checks made against Aberdeen City Council's air quality database and its duties under Local Air Quality Management (LAQM). The local authority is required to declare Air Quality Management Areas (AQMA) in localities where specific AQS are being breached due to one or more point and/or diffuse sources of air pollution. The authority does have an AQMA in relation to the nearby North Anderson Drive dual carriageway, where the breach is of NO<sub>x</sub> caused by road traffic emissions. An AQMA is accompanied by an Air Quality Management Plan (AQMP), with one or more nominated actions associated with specified measures relating to the polluting sources. It is confirmed the hospital's Energy Centre emissions are not a specified measure on the Council's Plan for improving air quality in the locality. The emissions from the operation of the Energy Centre and other point sources within the Foresterhill Campus are therefore not measurably harmful in terms of compliance with local AQS.

Submitted Document B4.1 'Impact Assessment' concluded that from the air dispersion modelling, given the height of the stack constructed, emissions of pollutants would have either an "extremely small" (less than 1% of EQS) or a "very small" (1-5% of EQS) impact on receiving air quality.

There are dedicated permit conditions relating to the emissions from the site and are divided into two sections in the document. Permit Section 4 'Conditions Applying to Combustion Plant (Energy Centre)' and Section 5 'Conditions Applying to Combustion Plant Within Permitted Installation (Excluding Energy Centre)' focus on the Energy Centre in the former and all other point sources in the latter. Each of the two sections address: 1) air emissions conditions, and 2) operation of the process.

Fugitive emissions to air:

None, other than those associated with periodic testing of emergency standby generators.

Odour:

The permitted activity should not give rise to any releases of odours; SEPA does not receive any complaints of odours emanating from the site by any nearby residents. Condition 3.2 odour conditions

### 5.3 Emissions to Water

Point Source Emissions to Surface Water and Sewer:

The Energy Centre's five boilers periodically discharge small volumes of boiler blow-down water to Scottish Water's nearby foul sewer. Building roof water and yard uncontaminated surface waters are discharged to Scottish Water's nearby surface water sewer. Staff welfare provisions in the Centre are also discharged to foul sewer.



<b>Point Source Emissions to Groundwater:</b>
There are no point source emissions to groundwater from the site. Permit Condition 3.3 'Groundwater and Soil Protection' requires the operator to keep up-to-date underground drainage plans for drainage maintenance purposes and for the prevention of leaks.
<b>Fugitive Emissions to Water:</b>
There are no known fugitive, diffuse or other non-point source emissions to water and/or groundwater at the site.
<b>5.4 Noise</b>
Noise and vibration have been addressed satisfactorily in submitted document B2.10 'Noise & Vibration' (36p rev 0.2). The Energy Centre building is quiet externally and SEPA has never received any noise complaints from the community since the application was submitted. Condition 3.1 in the Permit requires the operator to carry out a systematic assessment of noise and vibration emissions every four years.
<b>5.5 Resource Utilisation</b>
<b>Water Use</b>
Water is taken from the mains supply and then demineralised in a package water treatment plant for use in the boilers to raise steam.
<b>Energy Use and Generation</b>
Submitted Document B2.8 'Energy' presents a breakdown of input fuel use (for period June 2012 to May 2013). Natural gas formed 86.7% of the energy input total, biomass woodchip at 4.3% and standby fuel oil at 0.2%. There was some import of grid electricity at 8.8%. Energy Efficiency measures are also presented in this document (p4-8).
<b>Raw Materials Selection and Use</b>
Submitted Documents B2.2, B2.4 & B2.5 'Raw & Auxiliary Materials' (10p rev 0.2) satisfactorily address raw materials selection and use. Permit Condition 2.5 'Resource Utilisation' supports this topic. Permit Condition 3.7 'Raw Materials Storage' addresses the storage of these resources.
<b>5.6 Waste Management and Handling</b>
<b>Waste Minimisation</b>
Submitted Documents B2.6 and B2.7 (combined) on 'Waste' (9p rev 0.2) satisfactorily address the waste streams on site and their prevention and/or minimisation.
<b>Waste Handling</b>
Permit Conditions 2.6 'Waste Management' and Condition 3.6 'Waste Handling and Storage' specify detailed requirements for the handling, segregation and storage of the waste streams on site. Certain conditions require the operator to confirm details through the submission of a plan, for the approval of SEPA.
<b>Waste Recovery or Disposal</b>
Documents B2.6 & B2.7 address waste recovery and disposal. The main solid waste stream by mass is the burned biomass ash, which is held in small quantities on site, before its regular removal from the Energy Centre by a registered Waste Carrier and Waste Disposal operator. Solid and liquid wastes on site are generally minimal in nature. Most of the mass releases are to air, via the stack, in the form of combustion by-products (Section 5.2).
<b>5.7 Management of the Site</b>
<b>Environmental Management System</b>
Management approaches have been satisfactorily addressed in submitted Document B2.1 'Management Techniques' (59p rev 0.2). General conditions relating to environmental management best practices are specified in Section 2 'General Conditions' of the Permit. More specific conditions are stipulated in Permit Condition 3.5 'Environmental Management and Maintenance Systems'.
<b>Accidents and their Consequences</b>
Potential site accidents are addressed sufficiently in submitted Document B2.9 'Accident Prevention' (26p rev 0.2). Permit conditions relating to accidents and incidents are addressed in Condition 2.4 'Incidents' and in Condition 3.8 'Incident Prevention'.

Closure
Submitted Document B2.12 'Site Closure Plan' (9p rev 0.2) addresses considerations when the installation is near end of life. Permit Condition 2.9 'Decommissioning' specifies requirements in support of this.
<b>5.8 Site Condition Report</b>
Submitted Document B1.3 'Initial Site Report' (30p rev 0.4) represents the 'Site Condition Report' and summarises the status of the soil and groundwater quality at the site at the time of permit application. Appendix D of the report is the Baseline Data Report (122p) - 'Ground Investigation Interpretive Report' - containing the original data for the baseline monitoring of any soil and groundwater contamination at the installation. Future monitoring of soil and groundwater (Section 5.9 below) seeks to ensure there is no deterioration in site condition over the operational lifetime of the plant, as assessed at the time of Site Closure (Section 5.7) and prior to PPC Permit Surrender.
<b>5.9 Monitoring</b>
Air
Submitted Document B2.11 'Emission Monitoring' satisfactorily demonstrates BAT for emissions monitoring. Permit Conditions in Sections 4 and 5 lay down detailed requirements for monitoring, in terms of the parameters to be measured and their frequency. The Energy Centre is to be monitored annually, and other combustion units on a need basis. The Energy Centre represents about 90% of the combustion mass emissions to air from the campus.
Water
There is limited monitoring of wastewater (boiler blowdown effluent) to sewer, to comply with conditions in the Scottish Water Trade Effluent Consent.
Soil and Groundwater
Permit standard Condition 2.7 'Protection of Soil and Groundwater' lays down the requirements for the monitoring of soil and groundwater.
Waste
There is some limited monitoring of burned biomass ash in relation to its collection by the registered waste carrier.
<b>5.10 Consideration of BAT and Compliance with BAT-Cs if Appropriate</b>
The demonstration of BAT is satisfactorily made by the applicant in submitted Document B2.3 'Main Activities'. The demonstration of BAT is sufficient in the required areas, especially on emissions to air (p22-25 of document). This document also defines the Stationary Technical Units (STUs) and the Directly Associated Activities (DAAs), including details on oil storage tanks and emissions abatement equipment. Submitted Document B3.1 'Emissions Inventory' addresses BAT 'emissions benchmarks' (but these are now out of date).

<b>6 Other Legislation Considered</b>	
<b>Nature Conservation (Scotland) Act 2004 &amp; Conservation (Natural Habitats &amp;c.) Regulations 1994</b>	
<b>Is there any possibility that the proposal will have any impact on sites designated under the above legislation?</b> If yes, provide information on the action and justification below:	<b>No</b>
N/A	
<b>Screening distance(s) used</b>	The nearest nature designated site is the River Dee SAC – Special Area of Conservation – about 3 km to the south-east of the installation.
<b>Is there any other legislation that was considered during determination of the permit (for example installations that may be impacted by the requirements of legislation involving Animal By-Products, Food Standards, Waste, WEEE regulations etc)?</b> If yes, provide information on the legislation, action and justification below:	<b>Yes</b>

Part A Permit Application or Variation Dec. Doc (sec 2 technical)	Form: IED-DD-02	Page no: 10 of 12
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The EU Medium Combustion Plant Directive 2015/2193 ('MCPD') for plant of 1-50 MW, which was transposed into the PPC 2012 Regulations by an amendment in December 2017, for ELV for combustion units at the site within this size range.

**Officer** CO

## 7 Environmental Impact Assessment and COMAH

### Guidance Notes:

The PPC Regulations require that under certain circumstances SEPA take into consideration the information in any statutory Environmental Impact Assessment carried out as part of the planning process or a Safety Report produced under the Control of Major Accident Hazards Regulations.

**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 of certain public and private projects on the environment, been taken into account?**

An EIA was not undertaken, nor required to be so, during the statutory planning process for the new Energy Centre at the Foresterhill Health Campus.

**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 2015 been taken into account?**

COMAH does not apply to the Energy Centre and neither is there a COMAH site nearby in which any information within a Safety Report has a material bearing on the Foresterhill Health Campus.

**Officer:** CO

## 8 Details of the Permit

### Guidance Notes:

All non-standard conditions should be discussed with an appropriate specialist and legal to ensure they are appropriate and enforceable.

All non-standard conditions and, in the case of a permit variation, changes to existing text, tables or diagrams, should be outlined and justified below. Where a group of related conditions are included, these can be included in one section and a single justification provided. Justifications can be linked to sections above, and/or to the draft permit/variation schedule.

**Do you propose placing any non-standard conditions in the Permit?**

**No**

**Do you propose making changes to existing text, tables or diagrams within the permit?**

**No**

**Outline the changes required and provide justification below:**

Proposed Condition Number:	Proposed Change:	Justification:
Whole Permit	Original PPC Pt A Permit Template used at time of application (2013)	Not latest Permit Template
	Updated to reflect site changes and certain new standard conditions (protection of soil and ground water)	Only where essential

**Officer** CO

## 9 Emission Limit Values or Equivalent Technical Parameters/Measures

Are you dealing with either a permit application, or a permit variation, which would involve a review of existing ELVs or equivalent technical parameters?		No
Outline the changes required and provide justification below:		
ELVs in earlier draft Permit replaced (where appropriate) with new ELVs for Medium Combustion Plant, which came into force in 2023.		
Officer	CO	

10 Peer Review		
Has the determination and draft permit been Peer Reviewed?		Yes
Comments made:		
Officer	PR	

11 Final Determination		
Issue of a Permit - Based on the information available at the time		
<p><b>Issue a Permit</b> – Based on the information available at the time of the determination SEPA is satisfied that:</p> <ul style="list-style-type: none"> <li>The applicant will be the person who will have control over the operation of the installation/mobile plant,</li> <li>The applicant will ensure that the installation/mobile plant is operated so as to comply with the conditions of the Permit,</li> <li>The applicant is a fit and proper person (specified waste management activities only),</li> <li>Planning permission for the activity is in force (specified waste management activities only),</li> <li>The operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques.</li> <li>No significant pollution should be caused.</li> </ul>		