

EA answer to Q2

The Environment Bill will require that an ambient air quality target for PM2.5 is set by Statutory Instrument and laid before parliament by 31 October 2022. Assuming the Bill receives Royal Assent and that the SI passes unimpeded through parliament and is made, we currently do not know what the actual target level will be nor from when it will apply.

Even if an ambitious ambient air quality target was set in the near future, it would not necessarily require any further restriction on the incinerator emissions as such.

If it were to be found by the local authority that a statutory target was not being met, we would be expecting to work with the local authority to assess the contribution from our regulated facilities and identify what additional measures, if any, may be appropriate to consider to help achieve the target.

As we discussed in the last meeting, the air impact assessment predicts the impact to be insignificant at the emission limit values currently in the permit.

EA answer to supplemental question on modelling/monitoring

We don't require operators to monitor ambient air for pollutants as it would be impossible to establish what proportion of the pollutants measured is due to the facility and what is due to other pollution sources.

We regulate emission limits from samples of air taken from within the stack. This means that the permit requires the operator to monitor emissions at source and it is at that point that the emission limits are enforced. This monitoring will give a more accurate picture of the emissions from this facility than would off-site monitors.

The monitoring is undertaken to strict standards developed by the Environment Agency, called MCERTS; only specific MCERTS-certified equipment, methods and people are able to carry out the monitoring. We inspect and audit operators' monitoring on a regular basis to make sure that it is correct. We also assess the results of monitoring to make sure that facilities are performing within the parameters set in the permit.

The modelling referred to is used at the permitting stage as a tool to help us understand the potential impact of the emission on the air quality standards locally and to determine whether best available techniques have been applied or if further measures are required. In this case, we were satisfied the impact assessment conclusion presented by the operator that the emissions will not have a significant impact on air quality was reasonable. Our views and explanations for this are present in detail within the previously distributed permit decision document.

Essentially our assessment takes a conservative approach in assuming that the emission occurs continuously throughout the year at the maximum permissible emission limit values specified in the Industrial Emissions Directive. In practice, the normal operation of a well controlled combustion process coupled with appropriate

abatement measures will lead to an emission very much less than that assumed in the modelling.

Regarding the model use approach, our view is that modern atmospheric dispersion models have been extensively tested to check whether the predictions given by the models match up with actual measurements. We would only accept well validated models used to predict effects from industrial processes that we regulate.

Validation information for the model used in this case can be found here:-

<https://www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models#aermod>

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