

Questions put to Environment Agency regarding Particulates

Answers to J Howard questions of 20th March 2021- Provided by Mr Revill of EA

The questions 1 and 2 are mistaken in that they refer to PM2.5 as having a BAT standard. The new BAT standard from December 2023 will be an emission limit of 5mg/m³ for total dust (i.e. all particulate matter) as a daily average. The permit will be reviewed and varied before that time to reflect this. There are a whole range of potential outcomes for the operator not complying with a permit condition - a link to our enforcement and sanctions policy is here

<https://www.gov.uk/government/publications/environment-agency-enforcement-and-sanctions-policy/environment-agency-enforcement-and-sanctions-policy>

Q3. The background figures given by the operator's consultant were checked by our air modelling experts and were considered to be representative. I believe the figure quoted for the PM2.5 air quality objective was accurate in 2018.

Q4. There will be no impact on the permit itself.

Q5. The reduction in emission limit value for total particulates will not realistically have a direct discernible impact on local air quality. The figure in the 3rd column is the predicted environmental concentration which is the sum of the process contribution and the background concentration and is further explained here

<https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit#calculate-pec>

The figures used are for risk screening and modelling purposes usually using a process contribution derived from the maximum legal emission rate. We would not expect the plant to be operating at the limits on a routine basis.

Q6. This is an air quality objective, not a permit condition. Any monitoring for this objective will be directed by the local authority.

Total particulate matter is monitored continuously by the plant. The figure referred to is part of an impact assessment for what we call abnormal operation. This is defined in the Industrial Emissions Directive, applies only to certain operating conditions and is subject to duration limits. We are currently having to review this applicability in response to the BAT conclusions changes.

Q7. I refer to pages 62-75 in the decision document. These issues were addressed at the time of the permit variation.

Q8. The tables in section 6 of the air impact assessment are qualified in that the predicted impact is the highest determined for all receptor locations. The conclusions then relate to that, and it is justifiably assumed that the impact will be less at the other locations. Our check modelling concurred with those conclusions.