

Department of Health and Wellbeing

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Date: 07 December 2020

Dear Sir/Madam,

**RE: Application to operate a Small Waste Incineration Process at The End Journey Ltd, 544 Duncombe Rd, Bradford
Environmental Permitting (England and Wales) Regulations 2016**

I have examined your application to Bradford Council's Environmental Health Service (the Regulator) to operate a small waste incineration plant at the above address.

Small waste incineration plants must meet the provisions of chapter IV of the Industrial Emissions Directive(IED). Article 44 of the IED states the following:

“An application for a permit for a waste incineration plant or waste co-incineration plant shall include a description of the measures which are envisaged to guarantee that the following requirements are met: (a) the plant is designed, equipped and will be maintained and operated in such a manner that the requirements of this Chapter are met taking into account the categories of waste to be incinerated or co-incinerated”

Where the Regulator considers that the requirement of the Environmental Permitting Regulations cannot be complied with it must refuse the application.

From the information contained within the application I have concluded that the proposed installation cannot comply with the requirements of the Environmental Permitting Regulations. The information provided and your proposals fail to provide the guarantees outlined above. The proposals are overly simplified and consequently fail to meet the levels of pollution control required to comply with the relevant legislation. The application has, therefore, been rejected. Some of the reasons are as follows:

- 1) Article 46 of the IED states that it is a requirement that waste water from the cleansing of waste gases shall be limited as far as practicable and the concentration of polluting substances shall not exceed emission limit values. The application alludes to an on-site treatment plant, however, no details of the plant have been provided within the application and hence if it is capable of treating waste waters to the required standard
- 2) Article 46 of the IED requires there to be storage capacity for contaminated rainwater from the waste incineration plant site or from contaminated water arising

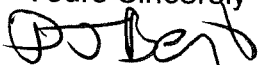
from spillage or firefighting operations. No such facilities have been proposed in your application

- 3) Article 50 states that Waste incineration plants shall be operated in such a way as to achieve a level of incineration such that the total organic carbon content of slag and bottom ashes is less than 3 % or their loss on ignition is less than 5 % of the dry weight of the material. No information has been provided in relation to securing compliance
- 4) Article 50 states that Waste incineration plants shall be designed, equipped, built and operated in such a way that the gas resulting from the incineration of waste is raised, after the last injection of combustion air, in a controlled and homogeneous fashion and even under the most unfavourable conditions, to a temperature of at least 850 °C for at least two seconds. There are no proposals to comply with this requirement. It should be noted that "syn gas" is classed as a waste.
- 5) Article 50 requires that each combustion chamber of a waste incineration plant shall be equipped with at least one auxiliary burner. This burner shall be switched on automatically when the temperature of the combustion gases after the last injection of combustion air falls below 850C. It shall also be used during plant start-up and shut-down operations in order to ensure that those temperatures are maintained at all times during these operations and as long as unburned waste is in the combustion chamber. This has not been proposed.
- 6) Article 50 requires that waste incineration plants and waste co-incineration plants shall operate an automatic system to prevent waste feed in the following situations: (a) at start-up, until the temperature reaches 850C; (b) whenever the temperature set in (a) not maintained; (c) whenever the continuous measurements show that any emission limit value is exceeded due to disturbances or failures of the waste gas cleaning devices.
The proposed installation is a batch process, however there is still a requirement to provide automatic systems to minimise emissions during adverse conditions.
- 7) Article 53 states that Residues shall be minimised in their amount and harmfulness. Residues shall be recycled, where appropriate, directly in the plant or outside. In the application it states that only metals will be recycled, whereas, it is feasible to recycle other materials such as carbon black. There are no details within your submission regarding this issue.

It is important to note that the above is not a definitive list of the insufficiencies of your application for approval. It is not the role of the Regulator to advise you on what information is required in your application or to detail every area where an application is insufficient. The Industrial Emissions Directive specifies the conditions that must be met before any approval is possible and it is the contents of that Directive which you will be required to have cognisance of in any future applications.

At this stage, I must inform should you that, should you decide to submit a further application I will require a much more detailed application to be submitted before I consider it "duly made ". On the last occasion it was decided that in order to expedite your application the EH service would allow you to submit further information as necessary after initially submitting a "bare bones" application. After having submitted two failed applications you will now be required to fully address the requirements detailed in the application form, submit information proving full compliance with both the relevant legislation and the best available techniques for the operation of a SWIP.

Yours Sincerely



Philip Best
Environmental Health Officer