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Consulting Engineers Limited





**GENT FAIRHEAD & CO
RIVENHALL
ABNORMAL EMISSIONS
ASSESSMENT**

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1 INTRODUCTION

Fichtner Consulting Engineers Ltd ("Fichtner") has been engaged to undertake an Abnormal Emissions Assessment to support the Environmental Permit application for the Rivenhall Integrated Waste Management Facility (IWMF).

The only significant source of atmospheric emissions from the Facility will be the stack, containing the multiple flue system. These emissions will be regulated by the Environment Agency under the terms of an Environmental Permit and will comply with the requirements of the Industrial Emissions Directive (IED).

The IWMF will include a Combined Heat and Power (CHP) plant consisting of 2 streams to process up to 595,000 tonnes per annum of non-hazardous Solid Recovered Fuel (SRF) and Refuse Derived Fuel (RDF). Due to the nature of the feedstock the Facility will require an Environmental Permit to operate which will include limits on emissions to air based on those outlined in Annex VI of the IED for waste incineration plants. This will include limits on emissions of oxides of nitrogen, sulphur dioxide, heavy metals and dioxins and furans.

The Environmental Permitting Regulations require that abnormal event scenarios are considered.

Article 46(6) of the IED states that:

"... the waste incineration plant ... shall under no circumstances continue to incinerate waste for a period of more than 4 hours uninterrupted where emission limit values are exceeded.

The cumulative duration or operation in such conditions over 1 year shall not exceed 60 hours."

Article 47 continues with:

"In the case of a breakdown, the operator shall reduce or close down operations as soon as practicable until normal operations can be restored."

The conditions detailed in Article 46(6) are considered to be "abnormal operating conditions" for the purpose of this assessment and only applies to the CHP plant.

2 IDENTIFICATION OF ABNORMAL OPERATING CONDITIONS

The following are considered to be examples of abnormal operating conditions which may lead to 'abnormal emission levels' of pollutants:

- (1) Reduced efficiency of lime injection system such as through blockages or failure of fans leading to elevated acid gas emissions (with the exception of hydrogen chloride);
- (2) Complete failure of the lime injection system leading to unabated emissions of hydrogen chloride. (Note: this would require the plant to have complete failure of the bag filter system. As a plant of modern design the plant would have shut down before reaching these operating conditions);
- (3) Reduced efficiency of particulate filtration system due to bag failure and inadequate isolation, leading to elevated particulate emissions and metals in the particulate phase;
- (4) Reduced efficiency of the Selective Non-Catalytic Reduction (SNCR) system as a result of blockages or failure of ammonia injection system, leading to elevated oxides of nitrogen emissions; and
- (5) Complete failure of the activated carbon injection system and loss of temperature control leading to high levels of dioxin reformation and their unabated release.

As a modern design, it is anticipated that the proposed Facility would be operated to a high degree of compliance. Therefore, the identification of plausible abnormal emission levels has been based primarily on the data obtained from modern plants. Where actual data is not available, worst case conservative assumptions have been made.

2.1 Plant start-up and shutdown

Start-up of the CHP plant from cold will be conducted with clean support fuel (low sulphur light fuel oil). Waste is not introduced into the CHP plant unless the temperature is above the minimum requirement (850°C) and other operating parameters (for example, air flow and oxygen levels) are within the range stipulated in the permit. During the warming up period the gas cleaning plant will be operational as will be the control systems and monitoring equipment.

The same is true during plant shutdown. The waste remaining on the grate is allowed to burn out, the temperature not being permitted to drop below 850°C by the simultaneous introduction of clean support auxiliary fuel. After complete burnout of the waste, the burners are turned off and the plant is allowed to cool. During this period the gas cleaning equipment is fully operational, as will be the control systems and monitoring equipment.

It should also be noted that start-up and shutdown are infrequent events; the CHP plant is designed to operate continuously, and ideally only close down for its annual maintenance programme.

In relation to the magnitude of dioxin emissions during plant start-up and shutdown, recent research has been undertaken by AEA Technology on behalf of the Environment Agency. Whilst elevated emissions of dioxins (within one order of magnitude) were found during shutdown and start-up phases where the waste was not fully established on the grate, the report concluded that:

"The mass of dioxin emitted during start-up and shutdown for a 4-5 day planned outage was similar to the emission which would have occurred during normal operation in the same period. The emission during the shutdown and restart is equivalent to less than 1 % of the estimated annual emission (if operating normally all year)."

There is therefore no reason why such start-up and shutdown operations will affect the long term impact of the Facility.

3 PLAUSIBLE ABNORMAL EMISSION LEVELS

The following plausible abnormal emission levels for the proposed CHP plant have been identified based on the performance of similar plants in the UK. The plausible abnormal emissions concentrations are presented in Table 1, where available, these have been based on measured data from a comparable Facility.

Table 1: Plausible Abnormal Emissions from an EfW

| Pollutant | IED Permitted Emission, (mg/Nm ³) | | Plausible Abnormal Emission, (mg/Nm ³) | % Above Max Permitted Emission |
|---|---|--------------|--|--------------------------------|
| | Daily Average | ½ hourly max | | |
| Oxides of nitrogen | 150 ⁽¹⁾ | 400 | 550 | 37.5 |
| Particulate matter (PM _{10S}) | 10 | 30 | 150 ⁽²⁾ | 400 |
| Sulphur dioxide | 50 | 200 | 480 | 125 |
| Hydrogen chloride | 10 | 60 | 900 ⁽³⁾ | 1,400 |
| Hydrogen fluoride | 1 | 4 | 90 | 2,150 |
| Dioxins | 0.1 ng/Nm ³ | | 10 ng/m ³ ⁽⁴⁾ | 9,900 |
| Dioxin like PCBs | 0.005 mg/Nm ³ | | 5 mg/Nm ³ ⁽⁵⁾ | 9,900 |

(1) Application is seeking for a lower limit than the IED, IED limit is 200mg/Nm³
(2) Taken from the Industrial Emissions Directive.
(3) Based on information presented in the Devonport Decision Document
(4) As previously requested by the Environment Agency.
(5) Dioxin like PCBs act in a similar way to dioxins.

A number of assumptions have been made with regard to the emissions of individual metals.

- (1) Emission concentration of mercury has been assumed to be 100% of the IED emission limit of 0.05mg/m³.
- (2) Emission concentration of cadmium has been taken as half the IED emission limit for cadmium and thallium and compounds of 0.05mg/m³.
- (3) Emission concentration of heavy metals that have a short or long term AQAL have been considered (antimony, arsenic, chromium, copper, lead, manganese, nickel, vanadium) and have been taken from "Guidance on assessing group 3 metals stack emissions from incinerators – v4". This guidance summarises the existing emissions from 18 EfW facilities in the UK over a period between 2007 and 2015.
- (4) Emission concentration of chromium (VI) is based on the ratio of the effective chromium (VI) emission concentration presented in the "Guidance on assessing group 3 metals stack emissions from incinerators – v4", to total metals emission.
- (5) The Predicted Abnormal Emission are calculated based on 15 times the emission concentration, as it is assumed that metals are in the particulate phase.

The plausible abnormal emissions concentrations are presented in Table 2 for metals.

Table 2: Predicted Abnormal Metal Emissions from an EfW

| Pollutant | Emission Concentrations ($\mu\text{g}/\text{m}^3$) | Predicted Abnormal Emission ($\mu\text{g}/\text{m}^3$) | % Above Max Permitted Emission |
|---------------|--|--|--------------------------------|
| Antimony | 11.5 | 172.5 | 1400 |
| Arsenic | 25 | 375 | 1400 |
| Cadmium | 25 | 375 | 1400 |
| Chromium | 92 | 1,380 | 1400 |
| Chromium (VI) | 1.30E-04 | 0.00195 | 1400 |
| Copper | 29 | 435 | 1400 |
| Lead | 50.3 | 754.5 | 1400 |
| Manganese | 60 | 900 | 1400 |
| Mercury | 50 | 750 | 1400 |
| Nickel | 220 | 3,300 | 1400 |
| Vanadium | 6 | 90 | 1400 |

The definition of 'abnormal operating conditions' also encompasses periods where the continuous emission monitoring equipment is not operating correctly and data relating to the actual emission concentrations are not available. This assessment has only used data where the concentration of continuously monitored pollutants has been quantified. Furthermore, no data on flow characteristics (flow rate, temperature etc.) during these abnormal operating conditions is available, so for the purposes of this assessment the design flow characteristics have been applied to the plausible emission levels to derive an emission rate and assess impact.

4 IMPACT RESULTING FROM PLAUSIBLE ABNORMAL EMISSIONS

All point source emissions from the Facility will emit to atmosphere via stacks contained within a common windshield. The effect of this is to have one visible stack. Emissions from this stack will include the two CHP lines, exhaust air from the pulp plant, the two AD gas engines, and the AD biofilter. Although there will be no combustion gases within the exhaust from the pulp plant or the biofilter, the temperature of the release from the AD biofilter is much lower than the CHP Plant and will impact upon the buoyancy of the plume. The exhaust air from the biofilter has been included to ensure any reduction in buoyancy is considered in the assessment.

4.1 Predicted short term impacts

To assess the effect on short term ground level concentrations associated with the CHP plant operating at the identified abnormal emission concentration, the calculated ground level concentration has been increased pro-rata as presented in Table 3.

Table 3: Short term Impacts Resulting from Plausible Abnormal Emissions

| Pollutant | AQAL ($\mu\text{g}/\text{m}^3$) | Predicted Impact – Daily Limit | | Predicted Impact – Abnormal Emission | |
|---|-----------------------------------|--------------------------------|-----------|--------------------------------------|-----------|
| | | Conc. $\mu\text{g}/\text{m}^3$ | % of AQAL | Conc. $\mu\text{g}/\text{m}^3$ | % of AQAL |
| Nitrogen dioxide | 200 | 6.1 | 3.06% | 22.0 | 11.00% |
| Particulate matter (PM _{10s}) | 50 | 0.3 | 0.57% | 3.8 | 7.62% |
| Sulphur dioxide (24-hour) | 125 | 3.4 | 2.72% | 29.2 | 23.33% |
| Sulphur dioxide (1-hour) | 350 | 5.8 | 1.67% | 49.9 | 14.27% |
| Sulphur dioxide (15-min) | 266 | 6.8 | 2.55% | 58.0 | 21.81% |
| Hydrogen chloride | 750 | 1.5 | 0.20% | 135.4 | 18.05% |
| Hydrogen fluoride | 160 | 0.1 | 0.06% | 9.0 | 5.64% |
| Pollutant | AQAL (ng/m^3) | Predicted Impact – Daily Limit | | Predicted Impact – Abnormal Emission | |
| | | Conc. ng/m^3 | % of AQAL | Conc. ng/m^3 | % of AQAL |
| Antimony | 150,000 | 1.73 | 0.001% | 25.94 | 0.017% |
| Chromium | 150,000 | 13.84 | 0.009% | 207.55 | 0.138% |
| Copper | 200,000 | 4.36 | 0.002% | 65.42 | 0.033% |
| Manganese | 1,500,000 | 9.02 | 0.001% | 135.36 | 0.009% |
| Mercury | 7,500 | 7.52 | 0.100% | 112.80 | 1.504% |
| Vanadium | 1,000 | 0.90 | 0.090% | 13.54 | 1.354% |
| Dioxin like PCBs | 6,000 | 0.75 | 0.038% | 75.20 | 3.760% |

This is considered to be a highly conservative assessment as it assumes that the plausible abnormal emissions coincide with worst case meteorological conditions. Even with these highly conservative factors, there are no exceedences of any of the short term AQAL. The maximum predicted process contribution (as a % of the applied AQAL) is less than 25% for sulphur dioxide with all other pollutants considerably lower.

4.2 Predicted long term impacts

In order to assess the effect on long term ground level concentrations associated with the Facility operating at the identified abnormal emission levels, the calculated long term ground level concentrations have been increased pro-rata as presented in Table 4 and Table 5. This assessment assumes that the Facility is operating at the daily average IED emission limits for 8,700 hours per year and at the plausible abnormal emission levels for 60 hours per year.

Table 4: Long Term Impacts Resulting from Plausible Abnormal Emissions

| Pollutant | AQAL ($\mu\text{g}/\text{m}^3$) | Predicted Impact –Daily Average Limits | | Predicted Impact – Abnormal Emission | |
|--|--------------------------------------|---|-----------|---|-----------|
| | | Conc. ($\mu\text{g}/\text{m}^3$) | % of AQAL | Conc. ($\mu\text{g}/\text{m}^3$) | % of AQAL |
| Nitrogen dioxide | 40 | 0.88 | 2.19% | 0.89 | 2.23% |
| Particulate matter (PM _{10S}) | 40 | 0.081 | 0.20% | 0.089 | 0.22% |
| Particulate matter (PM _{2.5S}) | 25 | 0.081 | 0.33% | 0.089 | 0.36% |
| Hydrogen fluoride | 16 | 0.15 | 0.94% | 0.24 | 1.51% |
| Pollutant | AQAL (ng/m^3) | Predicted Impact –Daily Average Limits | | Predicted Impact – Abnormal Emission | |
| | | Conc. (ng/m^3) | % of AQAL | Conc. (ng/m^3) | % of AQAL |
| Antimony | 5,000 | 0.20 | 0.004% | 0.22 | 0.004% |
| Arsenic | 3 | 0.09 | 3.120% | 0.10 | 3.419% |
| Cadmium | 5 | 0.10 | 2.035% | 0.11 | 2.230% |
| Chromium | 5,000 | 0.75 | 0.015% | 0.82 | 0.016% |
| Chromium (VI) | 0.2 | 0.000001 | 0.001% | 0.000001 | 0.001% |
| Copper | 10,000 | 0.24 | 0.002% | 0.26 | 0.003% |
| Lead | 250 | 0.41 | 0.164% | 0.45 | 0.179% |
| Manganese | 150 | 0.49 | 0.326% | 0.54 | 0.357% |
| Mercury | 250 | 0.41 | 0.163% | 0.45 | 0.178% |
| Nickel | 20 | 1.79 | 8.953% | 1.96 | 9.812% |
| Vanadium | 5,000 | 0.049 | 0.001% | 0.054 | 0.00107% |
| Dioxin like PCBs | 200 | 0.04 | 0.020% | 0.07 | 0.034% |

This is considered to be a highly conservative assessment as it assumes that the plausible abnormal emissions coincide with worst case meteorological conditions. Even with these highly conservative factors, there are no exceedences of any of the long term air quality limits. The maximum predicted process contribution (as a % of the applied AQAL) is less than 10%.

There is no AQAL for dioxins against which the impact can be assessed. Therefore, to assess the impact of dioxins, the increase for the receptor exposed to the Tolerable Daily Intake has been used to assess whether there will be a significant increase in the impact of dioxins by assessing against the receptor exposed to the Tolerable Daily Intake. As can be seen from the results presented in Table 5 this represents an increase in the maximum ground level concentration of 67.81%.

Table 5: Long Term Impacts from Predicted Dioxin Emissions

| Pollutant | Predicted Impact – IED Limits | Predicted Impact –Abnormal Emission | |
|-----------|-------------------------------|-------------------------------------|------------|
| | pg/m ³ | pg/m ³ | % increase |
| Dioxins | 0.41 | 0.68 | 67.81% |

Based on the results of the Human Health Risk Assessment, the receptor receiving the highest dose of dioxins from the Facility is predicted to be exposed to 6.28 % of the Tolerable Daily Intake (TDI) adult farmer at receptor HH18 Deeks Cottage. Assuming the impact of abnormal operations, it is calculated that the receptor receiving the highest maximum dose will be exposed to $(7.71\% \times 1.6781) = 12.94\%$ of the UK TDI for dioxins. Assuming the conservative factors stated within the modelling, there will be no exceedences of the TDI for dioxins.

5 PREDICTED ENVIRONMENTAL CONCENTRATION – ABNORMAL OPERATIONS

Environment Agency's guidance Air Emissions Risk Assessment for your Environmental Permit¹ ("Air Emissions Guidance") includes the following method for identifying which emissions require further assessment by applying the following criteria:

- the long term process contribution is <1% of the long term environmental standard; and
- the short term process contribution is <10% of the short term environmental standard.

Where the impact of abnormal emissions is greater than the above criteria consideration of the background concentration has been made to ensure that the AQAL is not exceeded as a result of abnormal operations.

5.1 Background concentrations

Appendix A outlines the values for the annual average background concentrations that have been used to evaluate the impact of the Facility. These are as presented in the Dispersion Modelling Assessment submitted with the Environmental Permit application.

5.2 Predicted short term impacts

Table 6 below presents the predicted impacts of plausible abnormal operations in the short term at the point of maximum impact and the Predicted Environmental Concentration (PEC) (process contribution plus background) for those pollutants for which the impact presented in Table 3 is greater than 10%.

| Pollutant | AQAL ($\mu\text{g}/\text{m}^3$) | Background Conc. | PC – Abnormal Emissions | PEC – Abnormal Emission | |
|---------------------------|--------------------------------------|--------------------------|--------------------------|--------------------------|-----------|
| | | $\mu\text{g}/\text{m}^3$ | $\mu\text{g}/\text{m}^3$ | $\mu\text{g}/\text{m}^3$ | % of AQAL |
| Nitrogen dioxide | 200 | 37.2 | 22.00 | 59.2 | 29.6% |
| Sulphur dioxide (24-hour) | 125 | 12.4 | 29.16 | 41.6 | 33.2% |
| Sulphur dioxide (1-hour) | 350 | 12.4 | 49.94 | 62.3 | 17.8% |
| Sulphur dioxide (15-min) | 266 | 12.4 | 58.03 | 70.4 | 26.5% |
| Hydrogen chloride | 750 | 1.4 | 135.36 | 136.8 | 18.2% |

As shown, the PEC is not predicted to be exceed the AQAL at the point of maximum impact for any pollutant during abnormal operations.

5.3 Predicted long term impact

The following table presents the predicted impacts of plausible abnormal operations in the long term at the point of maximum impact and the PEC. This assessment assumes that the Facility is operating at the daily average IED emission limits for 8,700 hours per year and at the plausible abnormal emission levels for 60 hours per year.

¹ <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit#environmental-standards-for-air-emissions>

Table 7: Long Term PEC Resulting from Plausible Abnormal Emissions

| Pollutant | AQAL ($\mu\text{g}/\text{m}^3$) | Background Conc. | PC – Abnormal Emissions | PEC – Abnormal Emission | |
|-------------------|--------------------------------------|--------------------------|--------------------------------------|--------------------------|-----------|
| | | $\mu\text{g}/\text{m}^3$ | $\mu\text{g}/\text{m}^3$ | $\mu\text{g}/\text{m}^3$ | % of AQAL |
| Nitrogen dioxide | 40 | 18.6 | 0.89 | 19.5 | 48.7% |
| Hydrogen fluoride | 16 | 2.4 | 0.24 | 2.6 | 16.2% |
| Pollutant | AQAL (ng/m^3) | Background Conc. | PC – Abnormal Emissions (1) | PEC – Abnormal Emission | |
| | | ng/m^3 | ng/m^3 | ng/m^3 | % of AQAL |
| Cadmium | 5 | 0.2 | 0.11 | 0.26 | 5.2% |
| Arsenic | 3 | 0.5 | 0.10 | 0.57 | 19.1% |
| Nickel | 20 | 1.4 | 1.96 | 3.33 | 16.7% |

(1) The ground level impact has been calculated by apportioning the maximum monitored emission concentration for each metal to the total group 3 metal Process Contribution.

As shown, the PEC is not predicted to be exceed the AQAL at the point of maximum impact for any pollutant during abnormal operations.

6 SUMMARY

An assessment of the impact on air quality associated with abnormal operating conditions from the Facility has identified plausible abnormal emissions based on a review of monitoring data from operational facilities of a similar type in the UK. Notwithstanding the low frequency of occurrence of such abnormal operating conditions identified by the review, the potential impact on air quality has been assessed.

The predicted impact on air quality associated with the identified plausible abnormal emissions has been calculated by pro-rating the impact associated with normal operations by the ratio between the normal and plausible abnormal emission values. This is considered to be a highly conservative assessment as it assumes that the plausible abnormal emissions coincide with the worst case meteorological conditions.

Even with these highly conservative factors, there are no predicted exceedences of any of the short term or long term air quality limits associated with abnormal operations. The maximum predicted short term process contribution (as % of the applied AQAL) is less than 25%; and the maximum predicted long term process contribution (as % of the applied AQAL) is less than 10%. Abnormal emissions from the Facility will not cause any exceedences of any AQAL. In addition, there will not be any exceedences of the TDI for dioxins.

It is concluded that during periods of abnormal operation as permissible under the IED (Article 46) is not predicted to give rise to an unacceptable impact on air quality or the environment.

Appendix A – Background Concentrations

| Summary of Background Concentrations | | | | |
|--|---------------------------|--------------------|---|---|
| Pollutant | Annual Mean Concentration | Units | Justification | |
| Nitrogen dioxide | 18.6 | µg/m ³ | 2013 mapped background dataset maximum grid square within the modelling domain. | |
| Oxides of nitrogen | 26.9 | µg/m ³ | | |
| Sulphur dioxide | 6.2 | µg/m ³ | 2001 mapped background dataset maximum grid square within the modelling domain. | |
| Particulate matter (as PM ₁₀) | 20.2 | µg/m ³ | 2013 mapped background dataset maximum grid square within the modelling domain. | |
| Particulate matter (as PM _{2.5}) | 13.8 | µg/m ³ | | |
| Carbon monoxide | 301 | µg/m ³ | 2001 mapped background dataset maximum grid square within the modelling domain. | |
| Hydrogen chloride | 0.72 | µg/m ³ | Maximum from all UK monitoring sites between 2011 and 2015. | |
| Hydrogen fluoride | 2.35 | µg/m ³ | Maximum measured baseline hydrogen fluoride concentration as presented in the EPAQS report. | |
| Ammonia | 1.8 | µg/m ³ | Maximum mapped background concentration within the modelling domain – 2014 dataset. | |
| Benzene | 0.4 | µg/m ³ | Maximum mapped background concentration within the modelling domain – 2001 dataset. | |
| 1,3-butadiene | 0.2 | µg/m ³ | | |
| Mercury | 1.51 | ng/m ³ | The maximum monitored metal concentration from at a rural site between 2011 and 2015. | |
| Cadmium | 0.15 | ng/m ³ | | |
| Arsenic | 0.47 | ng/m ³ | | |
| Antimony | 0.83 | ng/m ³ | | |
| Chromium | 3.43 | ng/m ³ | | |
| Cobalt | 0.08 | ng/m ³ | | |
| Copper | 2.57 | ng/m ³ | | |
| Manganese | 2.25 | 2ng/m ³ | | |
| Lead | 4.40 | ng/m ³ | | |
| Nickel | 1.37 | ng/m ³ | | |
| Vanadium | 1.11 | ng/m ³ | | |
| Dioxins and furans | 22.82 | fg/m ³ | | The maximum monitored metal concentration from at a rural site between 2008 to 2012 |
| Polychlorinated biphenyl (PCBs) | 141.50 | pg/m ³ | | |
| Benzo(a)pyrene (PaB) | 0.14 | ng/m ³ | Maximum monitored concentration from a rural background site between 2011 and 2015. | |



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