

Ongoing AVAI Review of the Environment Agency Draft Decision Document

The AVAI team have been scrutinising the (over fifty) documents released by the EA along with the Draft Decision Document and have asked for some other documents to be released. We are still *very concerned* about a number of aspects of the draft decision and feel that we should share some of these concerns with our supporters. The following is a brief summary of our work on this so far which we hope will assist you in drafting responses to the current consultation. [comment on the draft permit here](#)

1. Emissions [link to draft decision document](#)

1.1 Modelling

This is a key area, as the results of the emission modelling are used to predict compliance with the official pollution limits. The modelling is done using predictions obtained by running specialist computer programs.

This modelling assumes the incinerator will run at the maximum permissible limit for each pollutant essentially 24/7. The pollutants will be emitted through the chimney stack and subsequently be dispersed. The extent of the dispersion is mainly governed by the local weather patterns for example wind speed and direction and the location of the incinerator.

The consultant used by Endless Energy only used one program namely ADMS for their modelling which they said would accurately predict the pollution levels. AVAI have argued strongly *with supporting evidence* that this was the *wrong approach due to the proposed incinerator location in the valley bottom and the use of Bingley Weather station data*. This weather station is located between Wilsden and Denholme and is in a very elevated position.

In the recent release of 'missing documents' the EA included their audit of EE's results and they ran a number of different computer programs in recognition that the location of the proposed incinerator was a key factor. They still concluded that the pollution results they obtained were OK. AVAI recently requested a full set of the EA's results, which we received last Friday. These are currently being assessed.

1.2 Review of Predicted Emissions

The predicted pollution levels at receptors from the Air Quality Assessment, the Human Health Risk Assessment and the impact on habitat sites are also being reviewed as *we still have concern that there will be pollution* in the surrounding area and over the protected habitats on Ilkley Moor

1.3 Other Factors Influencing Emissions

The EA have assessed the compliance against the list of Best Available Techniques (BAT). We are currently reviewing all aspects of the BAT assessment including the design of the plant and the pollution control measures which are proposed.

We consider it is essential that our supporters have full confidence that EA have fully assessed all the contributing factors influencing the predicted pollution levels.

Alongside emissions the following aspects were among the last items that the EA were querying with the applicant prior to the issue of the Draft Decision Document. We are reviewing EE's responses in particular the final versions of their **Noise and Odour Plans**. *These along with concerns about the risk of fire are the most common reasons for public complaints after incinerators become operational.*

2. Odour Management Plan [link to odour management plan](#)

We are concerned that a number of the questions asked by the EA are not satisfactorily answered. There are a lot of vague references such as cleaning being carried out 'periodically' or 'as necessary'.

We are not convinced that EE have taken all precautions to contain odours, especially during periods when the plant is shut down and waste remains on site.

The increase in quantity of waste being burned will more than likely mean an increase in the number of lorries delivering to the site each day. This in itself is not a matter for the EA to deliberate on but with an increase in the number of lorries this could result in lorries queueing to unload. This in turn results in a greater risk of odours.

We can see no indication as to where quarantined waste i.e. waste that is not fit for burning will be stored. Other incinerators identify locked quarantined areas.

There are a number of areas where we do not feel confident that the developers have fully addressed all of the issues.

3. Noise Impact Assessment Report [link to noise report](#)

4. Fire Prevention Plan [link to fire prevention plan](#)

These last two sections are still to be fully reviewed by the team.

It would be helpful if any supporters would be able to review these documents to see whether they consider that EE have fully addressed all of the questions posed by the EA.

In addition, if you asked a question in the first consultation please check whether you feel that the question has been answered and if not put it again to the EA.

[comment on the draft permit here](#)

We will continue to update you on our findings.

AVAI Team
07 July 2020