

# Permitting Solid Recovered Fuel

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## Introduction

- Drivers
- The Environment Agency's position on recovering energy from waste
- Our role in permitting
- Overview of regulation
- Issues

## Drivers

- Economic
  - Renewables Obligation Certificates (ROCs), EU ETS etc
  - Increasing fuel prices and security of supply
  - Landfill tax escalator
- Environmental
  - Limited landfill space
  - Landfill Directive targets/Waste Strategy 2007
  - Climate change



## Environment Agency's position

- We support the principle of recovering energy from waste
- Recovering energy from waste should not compromise the waste hierarchy; prevention, re-use, recycle, energy recovery, disposal.
- We also consider that the energy generated should be recovered as far as practicable, for example using Combined Heat and Power (CHP), consistent with the requirements of Best Available Techniques (BAT).

## Considerations

- Where practicable, recoverable components should be removed from the waste stream before processing in order to optimise recovery.
- Separated components should be recovered as soon as possible and storage minimised. Maximum storage of SRF 3 years
- Mechanical and biological treatment processes should be operated to optimise materials recovery.

## Our role

- We will not issue an environmental permit for any facility, if we consider they will cause significant pollution to the environment or harm human health.
- We will make sure that the standards used in designing, maintaining and operating plants are at least as good as the agreed European standards.
- When we receive an application for an environmental permit to operate an energy from waste plant we consult members of the local community, the local authority and the public health bodies for their views on the potential effect on the environment and public health.

## Role of others

### Local authority's role

- Decide where each facility should be built.
- Determine how municipal waste should be managed, including what facilities are needed.
- We provide views on the environmental impact of facilities through input to draft spatial plans and responding to consultation on planning applications.

### Public Health Bodies' role

- We consult the local public health bodies (the Primary Care Trust in England or the Local Health Board in Wales) on an application for an environmental permit.

## Status of Solid Recovered Fuel

- Waste derived fuels do not ordinarily cease to be waste until they are burned and the energy recovered from them.
- The burning of waste is covered by the requirements of the EU Waste Incineration Directive

## National Legislation

- Environmental Permitting (England and Wales) Regulations, 2007 No. 3538 (In force from 6 April, 2008)
- Made under the PPC Act 1999 to set out a pollution control regime for activities previously regulated under IPPC and WML Regulations
- control operation of any installation or mobile plant carrying out any activities listed in *Part 2 of Schedule 1 of EPR*.

## EU Directives

- Relevant EU Directives, transposed into domestic legislation, are:
  - IPPC Directive
  - Waste Framework Directive
  - Hazardous Waste Directive
  - Waste Incineration Directive (WID) -MOST RELEVANT
  - MWID, HWID and part of Waste Oil Directive repealed by the WID

## Regulatory Framework

- Manufacture of Solid Recovered Fuel
- Environment Agency
  - Making solid fuel (other than charcoal) from waste by any process involving the use of heat.
  - Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day

## Regulatory Framework

### Burning of Solid Recovered Fuel

- Environment Agency
  - Burning any of the following fuels in an appliance with a rated thermal input of 3 megawatts or more:
    - waste oil;
    - recovered oil;
    - any fuel manufactured from, or comprising, any other waste.
- Local Authority
  - Less than 3 megawatts

## Waste Incineration Directive

- Incineration Plant
  - dedicated to the thermal treatment of waste
- Co-incineration Plant
  - main purpose is generation of energy or production of material products
  - uses waste as a regular fuel, or
  - in which waste thermally treated for purposes of disposal
- Local Authority – non hazardous waste incineration less than 1 tonne per hour

## Waste Incineration Directive requirements

- No De minimis
- No Gaseous Waste BUT “incineration” includes other thermal treatment processes such as Pyrolysis and Gasification if resulting substances are subsequently incinerated
- Substances - include gases
- Subsequently incinerated - anywhere

## WID requirements

- Principal issues raised:
  - Furnace temperature and residence times
    - exemptions
  - Maximum emission limits for a wide range of pollutants including dioxins, heavy metals, acid gases and combustion gases.
  - Continuous monitoring of HCl, SO<sub>2</sub>, PM, VOCs, NO<sub>x</sub> and CO.
    - exemptions

## Issues

- **Regulation**
  - Conditions/controls to prevent harm to the environment and health.
  - Strict emission limits, monitoring requirements, inspection and enforcement help to reassure a suspicious public.
- **Public perceptions**
  - Physical impact
  - Health concerns
  - Not compromise waste hierarchy