

# Consultation on the development of SEPA PPC Technical Guidance Note 35 – Anaerobic Digestion



## Response by Association for Organics Recycling

### 1 Introduction

- 1.1 The Scottish Environment Protection Agency has invited comments on its PPC Technical Guidance Note 35 for Anaerobic Digestion.
- 1.2 This guidance is intended to provide clear guidance on what SEPA considers to be the best available technique (BAT) for the anaerobic digestion of waste. It is aimed at operators preparing permit applications and officers determining applications.
- 1.3 It details a variety of issues that require consideration during the initial permitting of an anaerobic digestion facility.
- 1.4 It is not SEPA's intention to apply the guidance to the consequential offsite storage of digestate. For AD sites that fall under the Waste Management Licensing Regulations the guidance document should be considered what SEPA regard as best practice.
- 1.5 The Association for Organics Recycling is the United Kingdom's membership organisation, working on behalf of its members to raise awareness of the benefits of biological treatment processes and use of the outputs from such processes. The Association is committed to the sustainable management of biodegradable resources by promoting the benefits of composting and other biological treatment techniques for the enhancement of the environment, business and society.
- 1.6 The Association aims to act as an advocate for the wider biological treatment industry and to represent its views in a constructive dialogue with policy makers. It envisages an industry in which best practice is shared, standards are maintained and surpassed and which makes a positive contribution to safeguarding the environment.
- 1.7 The Association currently has about 350 members including compost and digestate producers, local authorities, consultants, technology suppliers, users of treated biodegradable materials, academics, other membership organisations and individuals.
- 1.8 The Association welcomes the above consultation and the opportunity to discuss any of the points raised in this response.

## 2 General comments

- 2.1 AFOR welcomes the proposed guidance document and supports any documents that make the regulatory position and requirements clearer for industry. It is useful to have a document that defines BAT and other permit requirements as this makes the application process more straightforward for applicants.
- 2.2 We would like to highlight that although a very well established process, AD is still a fast moving industry and what is considered BAT may change as technologies develop and it is important for SEPA to recognise that the guidance document will require revision and possibly updating in the future.

## 3 Comments on specific sections

Schedule 3:

- 3.3 The list of parameters is very comprehensive but all parameters may not apply to all potential feedstocks or digesting material or finished digestate. Clarity is needed regarding which parameters are relevant to which stage of the process, e.g. a list of parameters recommended for feedstock analysis, parameters for process control monitoring and digestate use. For example, 'availability of plant nutrients' is likely to be relevant for finished digestate but not for process control monitoring.

The guidance states that 'the operator needs to understand and monitor the above parameters'. Whilst AFOR support the statement with regards to understanding the digestion process and the effect that different feed stocks may have, there is a danger that by requiring operators to monitor for all the parameters, excessive cost is incurred without any benefit to the understanding of the process. In addition there is no guidance on the frequency of monitoring required. AD operators are very aware of the sensitivity of their systems and they understand what the key parameters are for their system and typical feedstocks, the last thing they want to do is destroy the biology of the digester.

Schedule 4:

- 4.3 AFOR would recommend prior analysis for every new waste stream but the guidance states that 'validation monitoring should be carried out of every load for new waste streams for the first month of acceptance thereafter being relaxed to once every three months.' There doesn't appear to be a definition of 'validation monitoring' in the document. We would recommend that validation monitoring be carried out according to the operator's operational plan or standard operating procedures, which can be agreed with SEPA in advance.
- 4.4 This statement is too general. As previously stated we feel that the list of parameter referred to in schedule 3 is comprehensive, but all parameters may not be relevant depending on whether feedstocks or digester contents are being tested. In addition there is no definition of 'frequent' and we doubt it possible to 'continually' assess the monitoring results where such results are (appropriately) obtained using monitoring at frequent intervals rather than continuous monitoring. The parameters for monitoring should be agreed on a site by site basis with SEPA depending on the type and consistency of the input materials.
- 4.15 Odour abatement - 'All liquid and slurried waste storage, buffer and digestate tanks should be connected to abatement to control breathing losses'. It is not clear in this part

of the guidance whether 'digestate tanks' means 'digestion tanks' and / or 'tanks for storing fully treated digestate'. Connection to abatement may not be practical in certain systems, for example, where the biogas is stored in the same tank. Given that this could have significant implications if the AD operator incorrectly interprets this requirement, SEPA should make clear which they mean, having first checked the practicalities.

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