

From: [Lewis, Helen](#)
To: [redacted]; [redacted]; [redacted]; [redacted]; [redacted]
Cc: [redacted]; [redacted]; [redacted]; [redacted]; [redacted]
Subject: Method of demonstrating Financial Provision Granville Ecopark LTD P0413/12/A
Date: 27 September 2024 12:18:23
Attachments: [image003.png](#)
[image005.png](#)
[image006.jpg](#)
[Financial Provision - Mechanism Template - Bank Bond - Updated 14.06.2024.DOCX](#)
[image001.png](#)
[image002.png](#)

[redacted] many thanks for your email. Please find attach the template for the Bank Bond that must be completed, and returned to me for NIEA Agreement. Please return completed document as soon as possible and by Friday 18th October 2024.

I will then need to obtain NIEA sign-off at Chief Executive level, and will be able to return the document to you for your records thereafter.

Please do let me know if you have any questions,

Kind regards,

Helen

Helen Lewis
Principal Pollution Inspector
Industrial Pollution and Radiochemicals Inspectorate
Regulation and Enforcement Division
Northern Ireland Environment Agency
Department of Agriculture, Environment and Rural Affairs (DAERA)
NIEA Headquarters Lisburn

Tel [redacted]



Sustainability at the heart of a living, working, active landscape valued by everyone.

From: [redacted]
Sent: Friday, September 20, 2024 6:38 PM
To: [redacted]; [redacted]; [redacted]; [redacted]; [redacted]
Cc: Lewis, Helen [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]; [redacted]
Subject: RE: CM: RE: Schedule 6 request and outstanding actions

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi Helen and [redacted]

Apologies for the delay on this, but we can confirm that we will put a bond in place for the financial provision guarantee.

Kind regards

[redacted]
Head of SHEQ

BIO CAPITAL LIMITED

[REDACTED]

E:

A: The Corn Store Hyde Hall Farm Buntingford Hertfordshire SG9 0RU

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From: [REDACTED]
Sent: 09 September 2024 11:44
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: CM: RE: Schedule 6 request and outstanding actions

Hi [REDACTED]

Thank you for the updated financial provision, my only query on the calculation is in regards to the CHP decommissioning cost, can you break that down a bit for me please?

Can I please request your guarantee for the total amount which may be any of the following:

- **Escrow** - An Escrow Account, is a joint account between the operator and the Agency and is operated under an appropriate Deed of Trust Agreement and bank mandate. Escrow accounts are normally cash based, although government backed security, such as treasury bonds may also be acceptable.
- **Bank/insurance bond (including bank guarantee)** - A bond is a form of guarantee that, in this instance, will involve up to three parties:
 - the party requiring the bond (the operator);
 - the bondsman/surety; and
 - the bond receiver (NIEA or an operator).
- **A Declaration of trust cash deposit** - Deposit of a cash lump or incremental sum into an agreed bank account. It must, however, be secured by way of a legal agreement (normally deed of trust), to ensure that the monies are only accessed for the required purposes. Interest accruing on these deposits may off-set an annual uplift for inflation.
- **PCG (Parent Company Guarantee)** - This is a guarantee by a parent company that they will provide the necessary resources to address the clearance and clean up requirements at a site, should their subsidiary not be in a position to do so e.g. the insolvency of the subsidiary.

Once you let us know which method you are going to use we can send you the correct form for completion.

2. Updated Financial Provision
3. Actions 1 – 4 detailed on the minutes of our meeting on 14th August (Part B of the Schedule 6 from the tank over topping events)

I look forward to hearing from you.

Thanks

[Redacted]

[Redacted]

Principal Inspector
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL

[Redacted]

[Redacted]

A close-up of a logo? Description automatically generated



From: [Lewis, Helen](#)
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: Minutes of Granville Ecopark Meeting re OMP V9 and TCP Attendance 10/09/24 and new Improvement Conditions for V3
Date: 18 September 2024 15:48:00
Attachments: [image001.png](#)
[P0413-12A Granville Eco Park meeting to discuss ~ OMP V9 and TCP attendance at the site 10 09 24.pdf](#)
[image002.png](#)

All,

Please see note of the meeting, please let me know if you wish to add/amend anything.

As discussed, I am hoping to get V3 issued to you.

Please see an additional Improvement Condition to cover the discussed TCP proposal that you will be submitting.

Addition:

IC14 The Operator shall complete a written proposal for provision of an increased level of Technically Competent Management (TCP) Attendance at the Site. The proposal shall be implemented on agreement from the Chief Inspector. Timeframe – proposal to be submitted within 4 weeks of permit issue.

Please provide feedback before close of play this Friday.

As you may be aware [REDACTED]
[REDACTED] will be your inspector. Please copy [REDACTED] into all emails, as well as myself.

Regards,

Helen
Helen Lewis
Principal Pollution Inspector
Industrial Pollution and Radiochemicals Inspectorate
Resource Efficiency Division
Northern Ireland Environment Agency
Department of Agriculture, Environment and Rural Affairs (DAERA)
NIEA Headquarters Lisburn

Tel [REDACTED]



Sustainability at the heart of a living, working, active landscape valued by everyone.

From: [REDACTED]
Sent: Thursday, September 5, 2024 2:31 PM
To: [REDACTED]
Cc: [REDACTED]; Lewis, Helen [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Minutes of Granville Ecopark Meeting 14.08.24.pdf

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Hi [REDACTED]

Hope all is well. As requested, please find attached the following documents:

- 5/8/24 Part B;

- 9/8/2024 Part B;

Regarding the action points raised in the last meeting, please find our answers below:

Action 1: Provide most recent calibration records for sensors on AD1 and AD2 tanks.

Previous calibrations of the pressure sensors cannot be located, due to the recent managerial changes the records could've been misplaced. Further checks are being carried out with accounts to confirm this.

We can confirm the level probes are included in the preventative maintenance schedule for the site for inspection, with the suppliers details included in the suppliers contact list in case parts or replacements are required to be ordered.

The calibration schedule has been updated including a calibration by a 3rd party to the pressure sensors installed on AD1&AD2.

Action 2: Provide copies of the following:

1. Process instrumentation diagrams for AD tanks [attached](#)
2. Process flow diagrams (schematics) for waste into AD tanks [attached](#)
3. Maintenance records for sensors [attached](#)

Site staff follows a bespoke preventative maintenance schedule including a visual inspection of the level in the tanks using the sight glass, there are no completed hard copies for the dates in question. Team will review this and improve the management system accordingly.

Inspection of the level in AD1&AD2 using the sight glass is now being carried out 2x daily. Pressure sensors will be replaced on both AD1& AD2.

- Pressure instrumentation for AD1 and AD2 to be calibrated by a 3rd party going forward on an annual basis
- Temperature probes for AD1 and AD2 to be calibrated by a 3rd party going forward on an annual basis

4. Site diary photos for Sunday, Monday and Friday. [attached](#)

Action 3: Provide details of any new equipment relating to the counter measures discussed (new pipework, sirens and associated alarms, new level sensors, new flow meters). To include plans/specifications/schematics and expected timeframe.

- AD1: stainless steel outlet DN200 stainless steel pipework, dedicated flow meter DN200 mag flow Meters currently installed, new automated knife valve actuated DN200 orbinox knife valves, SCADA integration- requires new cable run and integration Scada, Scada page show valve position open vs closed and the flow meter will totalize.
- AD2: stainless steel outlet DN200 stainless steel pipework, dedicated flow meter DN200 mag flow Meters currently installed, new automated knife valve actuated DN200 orbinox knife valves, SCADA integration- requires new cable run and integration Scada, Scada page show valve position open vs closed and the flow meter will totalize.,
- SCADA alarms interlocks:
 1. If/and or level percentage triggers 95% the feed to the digester will be cut.
 2. If/and or Foam radar sensor triggers 95% the feed to the digester will be cut.
 3. If/and or mbar sensor reaches 30mbar the feed to the AD will be cut.
- Specification of the equipment & material to be used being verified by the team. Internally, any changes to processes or installation on site must follow a management of change procedure.
- Installation & commissioning is aimed at: 2weeks for delivery from order, 2 – 4 weeks for installation & commissioning (with sign off report)

Action 4: Provide details of alarm and automatic shutdown levels on AD tanks.

SCADA alarms interlocks are working as follows

4. If/and or level percentage triggers 95% the feed to the digester will be cut.
5. If/and or Foam radar sensor triggers 95% the feed to the digester will be cut.
6. If/and or mbar sensor reaches 30mbar the feed to the AD will be cut.

If any of the above logic is triggered, it will cut the feed to the digestors. The feed will not restart until the logic sees the level below the threshold. Staff have access to SCADA through site computers and their mobile phone when remote access is required.

- Alarms detected by SCADA are listed on the screen and flash red continuously until:
 - Its acknowledged by site staff &
 - the deviation that triggered the alarm is resolved (eg pump tripping)

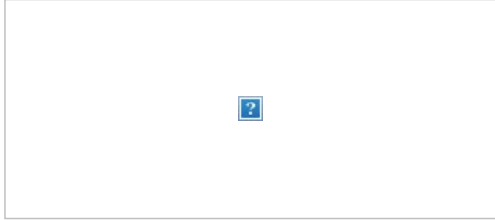
Speak soon

[REDACTED]
Environmental & Sustainability Manager
BIO CAPITAL LIMITED

T: [REDACTED]

E: [REDACTED]

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]

Sent: 15 August 2024 16:50

To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]

Cc: [REDACTED]; Lewis, Helen [REDACTED]

Subject: Minutes of Granville Ecopark Meeting 14.08.24.pdf

Good afternoon

Please see minutes of meeting held yesterday afternoon, if there is anything you want us to change please let me know and we can discuss.

As noted in the minutes we are content for you to provide the actions as part of the Schedule 6 Part B investigations alongside anything else you deem to be relevant.

Thanks

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: new wamitab - GECO
Date: 12 February 2025 13:38:57
Attachments: [image001.png](#)
[Wamitab - \[REDACTED\]_20012020200120_12361561.pdf](#)

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Hi [REDACTED]

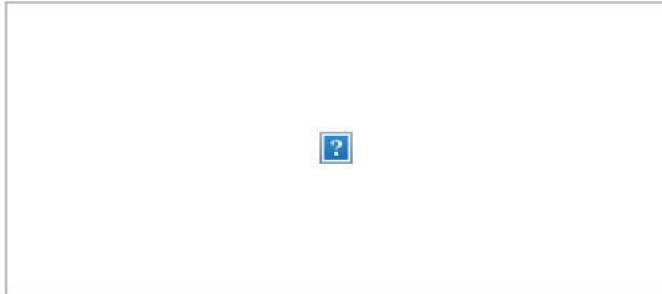
Trust you are well. As previously mentioned, we have a new Wamitab at GECO – [REDACTED], cc;ed in . We are confident the sites performance will continue to improve with [REDACTED] and are very happy he has agreed to lead GECO.

Speak soon

[REDACTED]
Environmental & Sustainability Manager
BIO CAPITAL LIMITED

T: [REDACTED]
E: [REDACTED] -

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [Lewis, Helen](#); [Cummings, Philip](#)
Subject: note of meeting to discuss odour survey (13/6/2024)
Date: 17 June 2024 14:23:00
Attachments: [image001.jpg](#)
[P0413 12A Granville Eco Park and NIFA meeting to discuss odour assessment proposal 13 June 2024.DOCX](#)

Hi everyone

Please see a draft note of our meeting last Thursday, if there is anything you wish to discuss or amend please let me know by Friday (21/6/24).

Thanks

[REDACTED]

[REDACTED]
Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL
T: [REDACTED]
E: [REDACTED]

A close-up of a logo Description automatically generated



From: [REDACTED]
To: [REDACTED] [Cummins, Philip](#)
Cc: [Lewis, Helen](#); [REDACTED]; [REDACTED]
Subject: Notice of Odour Survey
Date: 05 June 2024 12:04:40
Attachments: [image001.png](#)
[image002.png](#)
[Granville Ecopark Enforcement Notice - Stage 1 Summary Report_FINAL.pdf](#)

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

I hope you are well.

Please find attached report detailing the scope of the upcoming odour survey. Please note this has been updated to include the sampling of a CHP.

As requested, we also provide you notice that the survey is happening on 18/06/24-19/06/24.

If you have any questions, please let me know.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]

<!--[if !vml]--><!--[endif]-->A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU

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[REDACTED]

From: [REDACTED]
Sent: 23 August 2024 16:43
To: [REDACTED]
Subject: OCU technical review proposal
Attachments: 150724 Quotation High Level Odour Study Rev 1.pdf

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Hope all is well. As promised, please find attached the proposal for the OCU technical review. We have had decided to go ahead with [REDACTED]. Do let us know if you are happy with the scope of the proposal. We should be able to go ahead on the 12th of September.

Speak soon

[REDACTED]
Environmental & Sustainability Manager
BIO CAPITAL LIMITED

T: [REDACTED]
E: [REDACTED]

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [Redacted]
To: [Redacted]
Bcc: [Redacted]
Subject: Odour complaint 3/7/2024 from resident to NE of site
Date: 03 July 2024 16:49:00
Attachments: [image001.jpg](#)

Good afternoon

We have received an odour complaint from a resident to the NE of your site stating:

They described the odour as if it were a chemical type smell and said it was the smell of "B9". They noticed the smell when outside working in the garden. The odour was first noticed at approximately 12:00. They said they found it not particularly strong and intermittent due to the variation in wind strength, the odour was still present at 15.20.

Can you please investigate and come back to me.

Thanks

[Redacted]

[Redacted]

Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL
T: [Redacted]
E: [Redacted]

A close-up of a logo Description automatically generated



From: [REDACTED]
Sent: 10 September 2024 19:25
To: Lewis, Helen
Cc: [REDACTED]
Subject: odour survey 10th September update
Attachments: 20240910_173232.jpg; 20240910_165729.jpg; 20240910_173731.jpg; 20240910_173140.jpg

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Hi Helen

Thank you both for your time today. I will send over the odour investigation tomorrow as I still need to type it up but for your reassurance please see the photos attached.

Manure was recently spread in the field behind the site. The odour was pungent and the tracks in the land still new. The odour was noticeable all around the area (including dirt track behind the site) and quite further a field. I think it is likely the odour complaints were related to this rather than any industrial activities.



Speak soon

[REDACTED]
Environmental & Sustainability Manager
BIO CAPITAL LIMITED

T: [REDACTED]
E: [REDACTED]

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: P0413 12A - Granville Ecopark
Date: 07 May 2024 14:33:00
Attachments: [image001.png](#)

Hi [REDACTED]

[REDACTED] and I are looking to carryout a routine site inspection Wednesday 22nd May, 10.30am. Does this date suit?

We also thought it would be a good time to discuss the draft permit. I know we are expecting feedback from you by the 21st, so I thought we could take it as an opportunity to discuss any queries or issues you might have raised by then in person?

Regards

[REDACTED]

[REDACTED] [REDACTED]
Industrial Pollution and Radiochemical Inspectorate
Northern Ireland Environment Agency
17 Antrim Road
Lisburn
BT28 3AL
Tel: [REDACTED]



From: [REDACTED]
Sent: 06 December 2024 16:03
To: [REDACTED]; Lewis, Helen
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: P0413 12A Granville Ecopark - Enforcement Notice P0413/12A – EN-400-2024

Hi [REDACTED]

I have discussed the request with my manager and we are content to extend Notice P0413/12A – EN-400-2024 to the deadlines you have requested:

Steps to be taken	Proposed deadline
Operator to provide a proposal with timescales with justification for remedial actions to ensure an acceptable odour impact (e.g. 98%le<1 OU/m3 at the site boundary), which will include process and emissions monitoring.	28/02/24
Operator to provide an updated odour management plan to include proposed remedial actions.	31/03/25

Regards
[REDACTED]

From: [REDACTED]
Sent: 04 December 2024 16:57
To: [REDACTED]; Lewis, Helen [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Financial provision and odour impact assessment

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Please find attached the odour impact assessment report by Silsoe Odours, including recommendations. Now that we have received the report, we will assess the recommendations and start working on proposals to address these. These proposals will require discussion with internal teams and at least a couple of external contractors to ensure we are proposing robust solutions. Considering the work that needs to go into these proposals, and the imminent Christmas break we would like to request the following extensions for the Enforcement Notice steps detailed below.

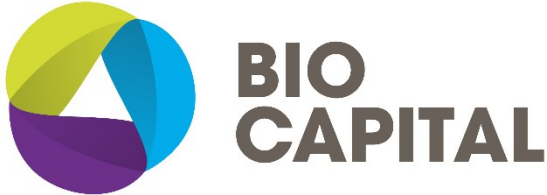
Steps to be taken	Proposed deadline
Operator to provide a proposal with timescales with justification for remedial actions to ensure an acceptable odour impact (e.g. 98%le<1 OU/m3 at the site boundary), which will include process and emissions monitoring.	28/02/24
Operator to provide an updated odour management plan to include proposed remedial actions.	31/03/25

If you have any questions or queries, please let me know.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: 28 November 2024 17:43
To: [REDACTED]; Lewis, Helen [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Financial provision and odour impact assessment

Hi [REDACTED]

I hope you are well.

We are awaiting receipt of the odour impact report from Silsoe Odours. There is a delay in use receiving this report and we will have this over to you by Wednesday 04/12/24.

I hope this is acceptable. Please let me know if you have any queries.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: 23 October 2024 15:51
To: [REDACTED]; Lewis, Helen [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Financial provision and odour impact assessment

Hi [REDACTED]

After discussions with Helen we are content to extend the deadline till 31st November 2024 for the financial provision.

We also content to extend the deadline to 31st November 2024 in relation to the Enforcement Notice:

Operator to provide a report by the independent odour control and AD expert of the odour impact assessment from all major point and fugitive odour sources with options for reducing the impact to an acceptable level from the significant contributors

We are reviewing the information submitted for Variation 4 and hope to get back to you before the end of next week with a decision on the commissioning of the CO2 plant.

Regards
[REDACTED]

From: [REDACTED]
Sent: 21 October 2024 16:27
To: Lewis, Helen [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: Financial provision and odour impact assessment

Hi Helen and [REDACTED]

I hope you are both well.

I am writing to you to let you know that we are conscious that the due date of 18/10/24 has past, by which time we were supposed to have returned to you the bond document for the financial provision at Granville Ecopark. Please accept my apologies but we have requested this from our bank, and I hope to be able to confirm this week when we will have the completed document to you.

We also have the upcoming deadline below as part of the Enforcement Notice. [REDACTED] of Silsoe Odours is currently working on the dispersion modelling and the impact assessment report. Unfortunately, [REDACTED] is leaving Silsoe Odours in October and joining another company. This is going to affect our ability to meet the below deadline [REDACTED] will continue this work at his new company), and we would therefore like to request an extension for this action to 31/11/24. Would this be acceptable?

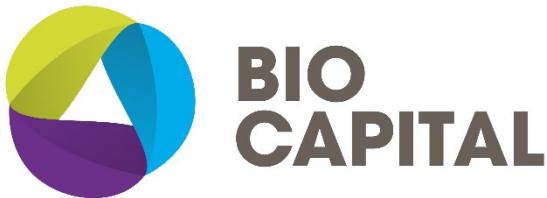
Operator to provide a report by the independent odour control and AD expert of the odour impact assessment from all major point and fugitive odour sources with options for reducing the impact to an acceptable level from the significant contributors	Currently agreed to 30/10/24
--	------------------------------

Finally, further to submitting the permit variation for the CO2 capture equipment in July, we are scheduled to carry out commissioning from 18/11/24. As with the gas to grid project, are we able to carry out commissioning of this equipment whilst we wait for the variation to be determined?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

[REDACTED]
E [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: PPC compliance assessment report for 23rd May 2024
Date: 19 June 2024 16:36:00
Attachments: [P0413_12A Granville Ecopark Compliance Assessment Report 23 May 2024.pdf](#)
[image001.jpg](#)

Good afternoon

Please see report attached, if you have any questions please do not hesitate to get in touch.

Thanks

[REDACTED]

[REDACTED]
Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL
T: [REDACTED]
E: [REDACTED]

A close-up of a logo Description automatically generated



From: [REDACTED]
To: [REDACTED]; [REDACTED]
Subject: PPC inspection report
Date: 27 February 2024 15:27:00
Attachments: [image001.png](#)
[PPC inspection report Granville Eco Park P0413 12A 2023 24-4.pdf](#)

Hi [REDACTED] [REDACTED]

I wrote up my visit on Thursday as a compliance assessment report, please see attached, you'll be pleased to see no actions raised. That completes our inspection schedule for 23/24.

No doubt we will be chatting soon anyway about the permit variation.

Thanks

[REDACTED]

[REDACTED]
Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
Klondyke Building
Gasworks Business Park
Ormeau Road
Malone Lower
Belfast BT7 2JA

T: [REDACTED]
E: [REDACTED]
DAERA Signature Strip New 2020 Green



Hope all is well. As requested, please find attached:

- the 23/8/24 schedule 6 notification
- E4 with the findings of the odour investigation
- Financial provision

Let me know if you need anything else.

Speak soon

[REDACTED]
Environmental & Sustainability Manager
BIO CAPITAL LIMITED

T: [REDACTED]

E: [REDACTED]

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]

Sent: 28 August 2024 10:43

To: [REDACTED]; [REDACTED]
[REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]

Cc: Lewis, Helen [REDACTED]; [REDACTED]

[REDACTED]; [REDACTED]

Subject: Schedule 6 request and outstanding actions

Importance: High

Good morning,

Please see odour assessment from Friday 23rd August attached, an unacceptable level of odour was noted outside your site boundary and as such we are requesting a Schedule 6 notification.

There are some outstanding actions that I would appreciate an update on as well please, if you can't provide the answers today please let me know when I can expect to see the information:

1. List of procedures related to OMP – I have attached my email requesting the procedures from 5th July, apologies if you have already sent a response to this but I can't see it in my emails
2. Updated Financial Provision
3. Actions 1 – 4 detailed on the minutes of our meeting on 14th August (Part B of the Schedule 6 from the tank over topping events)

I look forward to hearing from you.

Thanks

[Redacted]

[Redacted]

Principal Inspector
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL

T: [Redacted]
E: [Redacted]

A close-up of a logo? ? Description automatically generated



From: [REDACTED]
Sent: 04 March 2024 17:45
To: [REDACTED]
Subject: RE: Granville Ecopark- CO2 Project- Preapplication Meeting
Attachments: GECO CO2 Pre-app Technical Note.pdf

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Please find attached pre-app technical note in preparation for tomorrows meeting. Items we wish to discuss are documented in Section 7.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED
E: [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: Friday, March 1, 2024 3:34 PM
To: [REDACTED]
Subject: RE: Granville Ecopark- CO2 Project- Preapplication Meeting

Perfect, if I'm a bit late leaving site I'll let you know as it takes me approx. 1.5 hours to get back home and may need to push it back slightly

From: [REDACTED]
Sent: Friday, March 1, 2024 2:40 PM
To: [REDACTED]
Subject: RE: Granville Ecopark- CO2 Project- Preapplication Meeting

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Thanks [REDACTED]. I'll send an invite out for 1400 Tuesday afternoon.

I won't be on site Tuesday morning but am available to jump on a team's call whilst you're at GECO. I hope that works for you?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED
E [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: Friday, March 1, 2024 11:50 AM
To: [REDACTED]
Subject: RE: Granville Ecopark- CO2 Project- Preapplication Meeting

Monday AM and Tuesday PM are still ok for me, I was hoping to catch you at some point on Tuesday morning when we are planning to be at site anyway to discuss the recent odour issues, if you want to combine the chats that is grand or we can do it separately, whatever suits you best

Thanks

From: [REDACTED]
Sent: Friday, March 1, 2024 11:46 AM
To: [REDACTED]
Subject: RE: Granville Ecopark- CO2 Project- Preapplication Meeting

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Apologies in the delay in responding to you.

I'm waiting for our consultants to confirm their availability. Do you still have availability next Monday or Tuesday?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED
E: [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: Friday, February 23, 2024 4:24 PM
To: [REDACTED]
Subject: RE: Granville Ecopark- CO2 Project- Preapplication Meeting

Hi [REDACTED]

I have availability on 1, 4 and 5 March at the minute if any of those dates suit.

Thanks

From: [REDACTED]
Sent: Thursday, February 22, 2024 2:42 PM
To: [REDACTED]
Subject: Granville Ecopark- CO2 Project- Preapplication Meeting

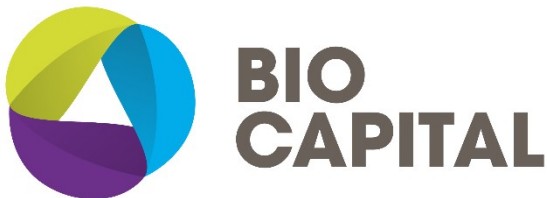
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Hi [REDACTED]

Further to our discussion, we are starting to prepare the permit variation documentation for the GECO CO2 project. We would welcome the opportunity to discuss requirements for this variation at a preapplication meeting. Would you be able to provide some potential dates for this meeting please?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED
E [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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[REDACTED]

From: [REDACTED]
Sent: 05 September 2024 14:31
To: [REDACTED]
Cc: [REDACTED]; Lewis, Helen; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Minutes of Granville Ecopark Meeting 14.08.24.pdf
Attachments: pasteurizers GECO AS BUILT PIDS.pdf; AD Tanks GECO AS BUILT PIDS.pdf; 090824 - Site Sheet.jpg; 050824 - site sheet.jpg; 040824 - Site sheet lab.pdf; AD tanks calibration schedule.png; 09-08-2024 Schedule 6 notification - Part B.pdf; 05-08-2024 Schedule 6 Notification - PART B.pdf

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Hope all is well. As requested, please find attached the following documents:

- 5/8/24 Part B;
- 9/8/2024 Part B;

Regarding the action points raised in the last meeting, please find our answers below:

Action 1: Provide most recent calibration records for sensors on AD1 and AD2 tanks.

Previous calibrations of the pressure sensors cannot be located, due to the recent managerial changes the records could've been misplaced. Further checks are being carried out with accounts to confirm this. We can confirm the level probes are included in the preventative maintenance schedule for the site for inspection, with the suppliers details included in the suppliers contact list in case parts or replacements are required to be ordered. The calibration schedule has been updated including a calibration by a 3rd party to the pressure sensors installed on AD1&AD2.

Action 2: Provide copies of the following:

1. Process instrumentation diagrams for AD tanks [attached](#)
2. Process flow diagrams (schematics) for waste into AD tanks [attached](#)
3. Maintenance records for sensors [attached](#)

Site staff follows a bespoke preventative maintenance schedule including a visual inspection of the level in the tanks using the sight glass, there are no completed hard copies for the dates in question. Team will review this and improve the management system accordingly.

Inspection of the level in AD1&AD2 using the sight glass is now being carried out 2x daily. Pressure sensors will be replaced on both AD1& AD2.

- Pressure instrumentation for AD1 and AD2 to be calibrated by a 3rd party going forward on an annual basis
- Temperature probes for AD1 and AD2 to be calibrated by a 3rd party going forward on an annual basis

4. Site diary photos for Sunday, Monday and Friday. [attached](#)

Action 3: Provide details of any new equipment relating to the counter measures discussed (new pipework, sirens and associated alarms, new level sensors, new flow meters). To include plans/specifications/schematics and expected timeframe.

- AD1: stainless steel outlet DN200 stainless steel pipework, dedicated flow meter DN200 mag flow Meters currently installed, new automated knife valve actuated DN200 orbinox knife valves, SCADA integration- requires new cable run and integration Scada, Scada page show valve position open vs closed and the flow meter will totalize.
- AD2: stainless steel outlet DN200 stainless steel pipework, dedicated flow meter DN200 mag flow Meters currently installed, new automated knife valve actuated DN200 orbinox knife valves, SCADA integration- requires new cable run and integration Scada, Scada page show valve position open vs closed and the flow meter will totalize.,
- SCADA alarms interlocks:
 - 1) If/and or level percentage triggers 95% the feed to the digester will be cut.
 - 2) If/and or Foam radar sensor triggers 95% the feed to the digester will be cut.
 - 3) If/and or mbar sensor reaches 30mbar the feed to the AD will be cut.
- Specification of the equipment & material to be used being verified by the team. Internally, any changes to processes or installation on site must follow a management of change procedure.
- Installation & commissioning is aimed at: 2weeks for delivery from order, 2 – 4 weeks for installation & commissioning (with sign off report)

Action 4: Provide details of alarm and automatic shutdown levels on AD tanks.

SCADA alarms interlocks are working as follows

- 4) If/and or level percentage triggers 95% the feed to the digester will be cut.
- 5) If/and or Foam radar sensor triggers 95% the feed to the digester will be cut.
- 6) If/and or mbar sensor reaches 30mbar the feed to the AD will be cut.

If any of the above logic is triggered, it will cut the feed to the digestors. The feed will not restart until the logic sees the level below the threshold. Staff have access to SCADA trough site computers and their mobile phone when remote access is required.

- Alarms detected by SCADA are listed on the screen and flash red continuously until:
 - o Its acknowledged by site staff &
 - o the deviation that triggered the alarm is resolved (eg pump tripping)

Speak soon

██████████
 Environmental & Sustainability Manager
BIO CAPITAL LIMITED

T: ██████████
E: ██████████

A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: 15 August 2024 16:50
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; Lewis, Helen [REDACTED]
Subject: Minutes of Granville Ecopark Meeting 14.08.24.pdf

Good afternoon

Please see minutes of meeting held yesterday afternoon, if there is anything you want us to change please let me know and we can discuss.

As noted in the minutes we are content for you to provide the actions as part of the Schedule 6 Part B investigations alongside anything else you deem to be relevant.

Thanks

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 17 December 2025 18:15
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Report of Odour - 10.12.25
Attachments: AD1 101225.png; AD2 101225.png

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Trust all is well. There were no breakdowns reported from site for the time of the complaint. Puregas was working only from 8 till 10 and the AD trends (attached) show the tanks did not vent. With “exhaust type odour” I would’ve expected similar to black smoke being spotted in/around the site and the description of “rancid type odour” could be associated with AD but given its was so short lived I am inclined to conclude this is not associated with GECO activities. I will reiterate to the team to report internally if neighbouring activities are causing odours, as this is helpful in a situation where we receive an odour complaint.

Speak soon

[REDACTED]
Environmental & Sustainability Manager
BIO CAPITAL LIMITED
T: +44 2045912577
M: +44 (0)7345450508
E: ana.afonso@bio-capital.co.uk
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: 11 December 2025 15:55
To: [REDACTED]

Cc: [REDACTED]

Subject: Report of Odour - 10.12.25

Caution: This email originated from outside of your organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi

The Department has received a report of nuisance odour emitting from Granville Estate 10.12.25 7.30am-8.30am. The odour was described as an exhaust type odour which then changed to a rancid type odour.

Did your facility have any issues or malfunction which may have resulted in either or both of the odours described?

Have your staff reported anything of note around that time?

Please investigate and report back.

Regards

[REDACTED]

[REDACTED]

Industrial Pollution and Radiochemical Inspectorate

Northern Ireland Environment Agency

17 Antrim Road

Lisburn

BT28 3AL

Tel: [REDACTED]

 Department of
Agriculture, Environment
and Rural Affairs
www.daera-ni.gov.uk

An Roinn
Talmhaíochta, Comhshaoil
agus Gnóthaí Tuaithe

Department of
Fairmin, Environment
an' Kintra Matthers

*Sustainability at the heart of a
living, working, active landscape
valued by everyone.*

Cc: Lewis, Helen [REDACTED]

Subject: Schedule 6 request and outstanding actions

Importance: High

Good morning,

Please see odour assessment from Friday 23rd August attached, an unacceptable level of odour was noted outside your site boundary and as such we are requesting a Schedule 6 notification.

There are some outstanding actions that I would appreciate an update on as well please, if you can't provide the answers today please let me know when I can expect to see the information:

1. List of procedures related to OMP – I have attached my email requesting the procedures from 5th July, apologies if you have already sent a response to this but I can't see it in my emails
2. Updated Financial Provision
3. Actions 1 – 4 detailed on the minutes of our meeting on 14th August (Part B of the Schedule 6 from the tank over topping events)

I look forward to hearing from you.

Thanks

[REDACTED]
Principal Inspector
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL
T: [REDACTED]
E: [REDACTED]



From: [REDACTED]
Sent: 18 March 2024 13:18
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: CHP and variation cost query

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Hi [REDACTED]

Regulations concerning Specified Generators were introduced by Schedule 9B of the Pollution Prevention and Control (Industrial Emissions) (Amendment) Regulations (Northern Ireland) 2018. Within Schedule 9B, a definition is provided for an “excluded generator” which is exempt from meeting the requirements of this Schedule. Section 2(2) provides this definition:

“(2) For the purposes of paragraph (1) –
“excluded generator” means -
(a) generators subject to the provisions of Chapter II or Chapter III of the Industrial Emissions Directive”

The CHP engines are a component part, and located within the boundary, of a Chapter II installation i.e., the main AD process. As such, as they are part of operations associated with a Chapter II installation, they are an excluded generator and exempt from the requirements of Schedule 9B. This clarification is also provided in the Environment Agency’s Specified generator: when you need a permit guidance:

Excluded generators

These generators are excluded from specified generator control that generates electricity you must also check if the MCP is excluded the [MCPD controls](#).

Chapter 2 or 3 Industrial Emissions Directive (IED) installations

Thank you for providing information on the fees and charges for a standard variation. As per the charging guidance could you please confirm how many ‘components’ will be charged. It is our interpretation that this variation concerns our section 5.3 activity (as the CO2 recovery is an extension of the biogas upgrading activity), which carries 4 components. Based on a standard variation charge of £1,706 per component, we would calculate the relevant application fee to be £6,824. Could you please confirm if this is correct?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU



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From: [REDACTED]
Sent: Friday, March 15, 2024 3:22 PM
To: [REDACTED]; [REDACTED]
Subject: CHP and variation cost query

Good afternoon

As discussed yesterday could you please provide justification as to why the CHPs are not classed as specified generators under MCPD and also that none of the CHPs have undergone significant refurbishment which cost more than 50% of what a new CHP would cost, since 2018.

Here is a link for the fees and charges for a standard variation, it may go up slightly in April:

[Pollution Prevention and Control fees and charges | Department of Agriculture, Environment and Rural Affairs \(daera-ni.gov.uk\)](https://www.daera-ni.gov.uk/pollution-prevention-and-control-fees-and-charges)

Thanks

[REDACTED]
Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
Klondyke Building
Gasworks Business Park
Ormeau Road
Malone Lower
Belfast BT7 2JA

T: [REDACTED]
E: [REDACTED]



Department of
**Agriculture, Environment
and Rural Affairs**
www.daera-ni.gov.uk

Sustainability at the heart of a
*living, working, active landscape
valued by everyone.*

From: [REDACTED]
To: [REDACTED]; [Cummings, Philip](#)
Cc: [Lewis, Helen](#); [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: CM: Notice of Odour Survey
Date: 12 June 2024 11:25:00
Attachments: [image001.png](#)
[Proposed Agenda for Odour Assessment Meeting.pdf](#)
[image002.png](#)
[image005.png](#)

Hi [REDACTED]

Thanks for setting up the meeting.

Generally, a very good, welcome and comprehensive test and assessment program, but IPRI has a few points that need to be clarified/amended, I have attached a proposed agenda for the meeting for your consideration.

Thanks

[REDACTED]

From: [REDACTED]
Sent: Wednesday, June 12, 2024 9:32 AM
To: [REDACTED]; Cummings, Philip
Cc: Lewis, Helen; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: CM: Notice of Odour Survey

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Good morning [REDACTED]

Could we please go for 1400 tomorrow? Please confirm and I'll send out a meeting invite this morning.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED
[REDACTED]

E: [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU

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From: [REDACTED]
Sent: Tuesday, June 11, 2024 3:51 PM
To: [REDACTED]; Cummings, Philip
[REDACTED]
Cc: Lewis, Helen [REDACTED] [REDACTED]
[REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
Subject: RE: CM: Notice of Odour Survey

Hi [REDACTED]

I'm available on Thursday, I'll check Silsoe's availability now and get back to you.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED
[REDACTED]

[REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU

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From: [REDACTED]
Sent: Tuesday, June 11, 2024 3:48 PM
To: [REDACTED]; Cummings, Philip [REDACTED]
[REDACTED]
Cc: Lewis, Helen [REDACTED] [REDACTED]
[REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
Subject: RE: CM: Notice of Odour Survey

Hi [REDACTED]

Thank you for sight of the scope, would it be possible to have a short meeting with yourself and Silsoe prior to the survey, just to discuss a few queries we have around the proposal. Thursday is good for us at the minute if there's a time then that would suit you?

Thanks
[REDACTED]

From: [REDACTED]
Sent: Wednesday, June 5, 2024 12:04 PM
To: [REDACTED]; Cummings, Philip [REDACTED]
[REDACTED]
Cc: Lewis, Helen [REDACTED] [REDACTED]
[REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
Subject: CM: Notice of Odour Survey

Hi [REDACTED]

I hope you are well.

Please find attached report detailing the scope of the upcoming odour survey. Please note this has been updated to include the sampling of a CHP.

As requested, we also provide you notice that the survey is happening on 18/06/24-19/06/24.

If you have any questions, please let me know.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: CM: Q42-8 Enforcement Notice P0413 12A Granville Ecopark
Date: 10 May 2024 15:43:44
Attachments: [image001.png](#)
[image003.png](#)
Importance: High

Hi [REDACTED]

Hope you are well.

We've had a chance to review the proposal from Silsoe and broadly agree with what has been said but we would welcome a meeting with them, and yourselves if you wish, to clarify some of the points.

Please let me know when would suit to arrange a Teams meeting, we'd be keen to get it in the diary as soon as possible.

Thanks

From: [REDACTED]
Sent: Monday, April 29, 2024 5:48 PM
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
[REDACTED]; [REDACTED]
[REDACTED]
Subject: CM: Q42-8 Enforcement Notice P0413 12A Granville Ecopark

CAUTION – This email has been received from outside the NICS network. If you have any concerns, please report for investigation.

Dear [REDACTED]

Please find attached an updated Odour Management Plan and proposal from an odour/AD expert to allow us to meet the first two actions with a due date of 30/04/24.

For clarity the following amendments have been made to section 10 of the OMP:

- Pressure and flow readings will be completed and recorded on form E2 to ensure pasteurisation vessels are under negative pressure.
- Inclusion of daily external site odour surveys.
- Inclusion of inlet and outlet odour monitoring of OCU to determine efficiency and inform when the carbon needs replacing.
- Measurement of scrubber operating parameters and record on plant log and lab form to ensure within correcting operating range.
- Inclusion of daily checks on OCU vents in buildings to ensure they are clean and free

of debris (included on E2 form).

In addition to the above, operatives at GECO have also recently been re-inducted on the attached TBT. This includes a section on fugitive emissions/ odour and the control measures that must be employed to manage odour effectively.

If you have any questions or require further information, please let me know.

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E [REDACTED]
A: The Corn Store, Hyde Hall Farm, Buntingford, Hertfordshire, SG9 0RU

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