

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]
To: [REDACTED]; [REDACTED]
Cc: [Lewis, Helen](#); [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: CM: RE: Schedule 6 request and outstanding actions
Date: 20 September 2024 18:37:54
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)

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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

E [REDACTED]

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

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

Subject: CM: RE: Schedule 6 request and outstanding actions

Hi Ashleigh

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]

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]

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From: [REDACTED]
To: [REDACTED]
Cc: [Lewis, Helen](#)
Subject: RE: CM: Updated financial provision requirements
Date: 08 August 2024 09:37:05
Attachments: [image002.png](#)
[image006.jpg](#)
[image001.png](#)
[image004.png](#)

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Hi [REDACTED]

Apologies for the delay on this. Some of the costs and waste streams need reviewing with the site team.

Could I please request that we get this over to you by the end of next week?


Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]

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affairs of the company or its clients.

From: [REDACTED]
Sent: Monday, August 5, 2024 10:52 AM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: RE: CM: Updated financial provision requirements

Hi [REDACTED]

Hope you are well, I just wanted to follow up on the below, are you in a position to send the new calculation over to us?

Thanks

[REDACTED]

From: [REDACTED]
Sent: Thursday, July 18, 2024 1:32 PM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: RE: CM: Updated financial provision requirements

Hi [REDACTED] and Helen

Could I please request until next Wednesday 24/07/24 to return to you the financial provision information in the updated format?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

[REDACTED]

E: [REDACTED]

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From: [REDACTED]
Sent: Friday, June 21, 2024 1:10 PM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: RE: CM: Updated financial provision requirements

Hi [REDACTED]

I note you are off on leave until 2nd July so I am content to change the deadline on the below email until the 16th July.

Thanks

[REDACTED]



From: [REDACTED]
Sent: Friday, June 21, 2024 11:58 AM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: CM: Updated financial provision requirements
Importance: High

Hi [REDACTED]

I hope you are well? In relation to our last correspondence regarding Financial Provision in November of 2023, there have been some changes made to the NIEA Financial Provision policy. NIEA requires the Financial Provision Calculation to be made in the format of the template provided, see attachment for an example – I think this is very similar to what you used for your previous calculation so not too many changes required but we need it to be signed and dated at the bottom as indicated on the template. Please transfer details onto the accepted format.

The objectives of FP are;

- To ensure adequate funding is provided to ensure that the requirements of the waste authorisation can be complied with;
- In determining “adequate funding”, the operator must ensure all operational obligations, post closure and restoration costs are identified and incorporated within the calculation of financial provision;
- The funding is available and readily accessible when required; and
- The measures in place must be demonstrated, sound and be auditable by NIEA.

Please note that the only accepted methods of providing Financial Provision are:

- **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.

Please note Credit Reference Check's and Statements of Account are not financial mechanisms.

Please provide, updated calculation and preferred method of providing FP by close of play Friday 28th June 2024. I will then send you the appropriate template for signature. This is required to be in place prior to NIEA issuing the varied permit. It will be removed as an Improvement Condition from the draft once in place.

As such, may I please request an extension to the timeframe for permit issue to allow us to get this information in place and make changes to the draft permit prior to final issue?

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: Lewis, Helen
Cc: [REDACTED]; [REDACTED]; Cummings, Philip; [REDACTED]; [REDACTED]
Subject: RE: Compliance Assessment Report 18/19 June 2024 and draft minutes of meeting on 10 July 2024 to discuss Silsoe Report
Date: 26 July 2024 16:41:26
Attachments: [image001.png](#)
[image006.png](#)
[image002.png](#)
[image005.png](#)
[AHB AE 23 166 - 2 v.0 - GRANVILLE Ecopark - CHEMVIRON - Odour abatement evaluation and activated carbon proposal.pdf](#)
[EN CPL Final SDS Filtracarb Activated Carbon 2022 Rev 8 UK.pdf](#)

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Hi Helen

Thank you for your email. Please see our responses below in green.

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

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E [REDACTED]
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From: Lewis, Helen <Helen.Lewis@daera-ni.gov.uk>
Sent: Monday, July 22, 2024 3:34 PM

To: [REDACTED]
Cc: [REDACTED]; Cummings, Philip

Subject: FW: Compliance Assessment Report 18/19 June 2024 and draft minutes of meeting on 10 July 2024 to discuss Silsoe Report

Tom, thank you for your email, and for submitting part B of the Schedule 6 notice.

1. **Short-term actions.** Thank you for the proposed timeframes.

2. **OCU:**

- Thank you for supplying the data sheet for the EN-Envirocarb. Given that you have the GCMS results now, can you provide me with your calculations to provide assurance that this activated carbon will adsorb all of the odorous chemicals (highlighted in red on the report). Please also provide details of the depth of bed this needs to be, and how long the carbon bed is likely to remain effective, given the flows and concentrations being applied to it. Please also provide revised maintenance frequency (i.e. to change prior to the carbon becoming saturated). Please find attached report from Chemviron detailing the basis for recommendation of the carbon specification. Following the carbon change olfactometry testing will confirm its effectiveness scheduled for August. We propose that we will then carry out increased olfactometry testing on a quarterly basis to determine when the carbon needs to be changed. This will be included in the OMP. The carbon vessels in the OCU have a volume of 33m³.
- Please provide the specification of the current activated carbon in the OCU, depth of bed, and when this was last changed. Please find attached MSDS. Carbon vessel volume is 33m³. The Carbon was last changed on 02/11/23.
- Please ensure you complete a Schedule 6 notification prior to carrying out the works on the OCU. This is required under Condition 5.3.1. of your permit "The Chief Inspector shall be notified without delay following the detection of (a) any malfunction, breakdown, or failure of equipment or techniques, accident or fugitive emission, which has caused, is causing or may cause significant pollution". You must ensure you are employing Appropriate Measures. Waste must not be accepted during the time period when the OCU is not operational, as this is likely to lead to significant emissions of odour off-site. Similarly, you are likely to need to reduce capacity in the days running up to the OCU downtime to reduce pressure of the system. Please provide updated commitments by COP Friday 26 July 2024. We commit to accepting

1. **Short-term actions.** Thank you for the proposed timeframes.

2. **OCU:**

- Thank you for supplying the data sheet for the EN-Envirocarb. Given that you have the GCMS results now, can you provide me with your calculations to provide assurance that this activated carbon will adsorb all of the odorous chemicals (highlighted in red on the report). Please also provide details of the depth of bed this needs to be, and how long the carbon bed is likely to remain effective, given the flows and concentrations being applied to it. Please also provide revised maintenance frequency (i.e. to change prior to the carbon becoming saturated). **Please find attached report from Chemviron detailing the basis for recommendation of the carbon specification. Following the carbon change olfactometry testing will confirm its effectiveness scheduled for August. We propose that we will then carry out increased olfactometry testing on a quarterly basis to determine when the carbon needs to be changed. This will be included in the OMP. The carbon vessels in the OCU have a volume of 33m3.**
- Please provide the specification of the current activated carbon in the OCU, depth of bed, and when this was last changed. **Please find attached MSDS. Carbon vessel volume is 33m3. The Carbon was last changed on 02/11/23.**
- Please ensure you complete a Schedule 6 notification prior to carrying out the works on the OCU. This is required under Condition 5.3.1. of your permit *"The Chief Inspector shall be notified without delay following the detection of (a) any malfunction, breakdown, or failure of equipment or techniques, accident or fugitive emission, which has caused, is causing or may cause significant pollution"*. You must ensure you are employing **Appropriate Measures**. Waste must not be accepted during the time period when the OCU is not operational, as this is likely to lead to significant emissions of odour off-site. Similarly, you are likely to need to reduce capacity in the days running up to the OCU downtime to reduce pressure of the system. Please provide updated commitments by COP Friday 26 July 2024. **We commit to accepting waste as you have suggested and will ensure that waste volumes in the reception building are minimised during the carbon exchange. Do we need to submit another schedule 6 for the carbon change? It is our view that we informed you of this permit breach with the schedule 6 on 08/7/24 and the carbon exchange is detailed in the part b and and supporting proposal document submitted on 18/07/23. We interpret this to all be the same event.**
- You will also need to consign the carbon as hazardous waste, to a suitably authorised facility, where thresholds are above limits. Please provide details of where the carbon is to go, and HW consignment note number. **Previously Carbon has been tested and sent to an appropriate facility depending on results. Non hazardous waste is collected by Eastwood Ltd. Haz Waste collected by Irish Waste (<https://irishwaste.net/>) to undergo Hazardous Waste Treatment recycling. GECO will sample Carbon upon change and decide on best disposal. Follow up details will be confirmed with NIEA including consignment note number.**

3. **Medium term actions:** NIEA is content with GECO proposed actions and timeframes.

4. **Longer term actions:** NIEA is content to extend the deadlines in the Enforcement Notice as requested by GECO to facilitate additional works (some of which may require capitol expenditure).

Steps to be taken	Proposed deadline	NIEA comments
Operator to provide a report by the independent odour control and anaerobic digestion expert of the characterization and quantification of all major point and fugitive odour sources.	30 th of September	Agreed to 30/09/24
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	30 th of October	Agreed to 30/10/24
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.	31 st of December	Agreed to 31/12/24
Operator to provide an updated odour management plan to include proposed remedial actions.	31 st of January	Agreed to 31/01/25

Kind regards,

Helen

From: [REDACTED]

Sent: Thursday, July 18, 2024 5:14 PM

To: Lewis, Helen [REDACTED]

[REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; Cummings, Philip [REDACTED]

Subject: RE: Compliance Assessment Report 18/19 June 2024 and draft minutes of meeting on 10 July 2024 to discuss Silsoe Report

Hi Helen

As promised, please find attached proposal and additional information.

If you have any questions, please let me know.

Kind regards

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

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From: Lewis, Helen [REDACTED]

Sent: Thursday, July 11, 2024 4:57 PM

To: [REDACTED]

Cc: [REDACTED]; [REDACTED]; [REDACTED];

[REDACTED]; [REDACTED]; [REDACTED];

Cummings, Philip [REDACTED]

Subject: Compliance Assessment Report 18/19 June 2024 and draft minutes of meeting on 10 July 2024 to discuss Silsoe Report

Tim, please find Compliance Assessment Record for the 18/19 June 2024.

All, please find a copy of the draft minutes of the meeting on 10 June 2024 to discuss the interim Silsoe results. Please let me know by close of play next week if you would like and amendments made.

Kind regards,

Helen

Helen Lewis
Head of Chemicals Compliance
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]



From: [REDACTED]
To: [Lewis Helen](#); [REDACTED]
Cc: [REDACTED]
Subject: RE: Financial provision and odour impact assessment
Date: 05 November 2024 10:14:25
Attachments: [image001.png](#)
[image003.png](#)
[image005.png](#)
[59664 FEB 19Oct2024 NIEA Financial Provision - Mechanism Template - Bank Bond -Granville Ecopark Limited.docx](#)

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Hi Helen and [REDACTED]

I hope you are well. We are finalising the bond with HSBC and they would like to add the following Evergreen Clause into the template:

"Each Term shall automatically renew for subsequent period of the same length as the initial Term unless either party gives the other written notice of termination at least (30) days prior to expiration of the current term."

Are you happy for this wording to be added to the template?

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E [REDACTED]

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From: Lewis, Helen <Helen.Lewis@daera-ni.gov.uk>
Sent: 23 October 2024 15:53
To: [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Financial provision and odour impact assessment

Jut to confirm the extension is for 30 November 2024 – last day of November.

Kindest regards, Helen

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

E [REDACTED]
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From: [REDACTED]
To: [REDACTED]
Cc: [Lewis, Helen](#)
Subject: RE: FW: Element SSP EMT10712
Date: 02 September 2024 09:35:00
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.jpg](#)

Hi [REDACTED]

Thanks for this, we are ok with it not being 2 weeks in advance as long as we get all the required information a reasonable amount of time in advance i.e. a week.

I don't think this SSP adequately covers what you have proposed to monitor as it appears to only be for the OCU final outlet after the carbon bed. Can I request SSPs for the other points you propose to monitor:

- Vibrating screens
- Degritting unit
- CHP 3
- CHP 4

It is unclear if this SSP covers the other OCU monitoring i.e. inlet duct, post first scrubber and post second scrubber – can you please clarify?

You have also mentioned the reception building, the soup building and the dewatering building in your original quote, can Element provide SSP for those locations as well please?

Thanks
Ashleigh

From: [REDACTED]
Sent: Friday, August 30, 2024 5:47 PM
To: [REDACTED]
Subject: CM: FW: Element SSP EMT10712

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Hi [REDACTED], the SSP just came in I will be reviewing this at the same time so we don't have any delays. Please share your comments.

My only concern with this is the minimum 2 weeks lag time prior the survey taking place, this would leave us stuck with starting the survey on the 13th. What is your take on this? Under the MCERTS guidance would this invalidate the survey?

Have a great weekend

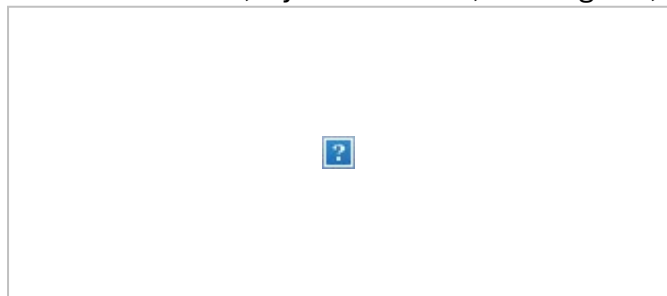
Speak soon

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

T: ██████████

E: ██████████

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



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From: ██████████

Sent: Friday, August 30, 2024 4:48 PM

To: ██████████ >

Cc: ██████████

Subject: Element SSP EMT10712

Hi ██████████

Please find attached our Site Specific Protocol (SSP) for the air emissions monitoring to be carried out 10th - 13th September which INAB require us (under the MCERTS Scheme) to send to you, for you to "review and approve" before we undertake the site work.

Ideally, this would involve you signing the front cover, to confirm your acceptance, or emailing a copy back to me, however, if it's easier, by all means reply to this email, to say something like "Yes, I accept your SSP", and we can keep a copy of your email on file. You should also keep a copy of our SSP on file, in case you are ever audited, or you wish to check the agreed scope of work.

The site team will be Donal O Faogain and Athony Kelly If you have any questions, please let me know.

Kind regards



SITE MANAGER
Element Materials Technology
Unit D8, North City Business Park, North Road
Finglas, Dublin 11, United Kingdom

www.element.com



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For information about how we process data and monitor communications please see our Privacy statement at <https://www.element.com/terms/privacy-statement>

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Gas to grid connection
Date: 22 May 2024 17:53:24
Attachments: [image001.png](#)
[image007.png](#)
[image009.png](#)
[image010.png](#)
[image014.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image008.png](#)
[image012.png](#)
[P0413 12A V3 Granville Ecopark Permit Draft May 2024 2 GECCO Comments.pdf](#)

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Hi [REDACTED]

Please find attached copy of draft permit with comments for our meeting tomorrow.

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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From: [REDACTED]
Sent: Tuesday, May 21, 2024 3:04 PM
To: [REDACTED]
Subject: RE: Gas to grid connection

Hi [REDACTED]

No problem at all.

Thanks

[REDACTED]

From: [REDACTED]
Sent: Tuesday, May 21, 2024 3:02 PM
To: [REDACTED]
Subject: RE: Gas to grid connection

Hi [REDACTED]

Apologies we will have comments over to you on the draft permit tomorrow, in preparation for Thursday's meeting.

I trust this is acceptable.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

[REDACTED]

E: [REDACTED]
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From: [REDACTED]
Sent: Friday, May 3, 2024 3:20 PM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: RE: Gas to grid connection

Hi [REDACTED]

Please find a draft copy of your new permit attached to this email, if you have any queries please come back with comments on or before Tuesday 21st May.



Please note that I have highlighted a number of waste codes in schedule 2, these do not appear on the PAS 110 document, is there a reason or a need for them to be kept on the schedule or would you be content for me to remove them for the final version of the permit?

In answer to your query about operating the gas to grid connection, it is fine to operate while you review the draft permit.

If you have any questions please do not hesitate to give me a call.

Thanks

[REDACTED]

From: [REDACTED]
Sent: Thursday, May 2, 2024 5:59 PM
To: [REDACTED]
Subject: RE: Gas to grid connection

Hi [REDACTED]

I hope you are well.

Further to our telephone discussion last year it would be helpful if you could confirm that

whilst we are waiting for receipt of the draft permit, Granville Ecopark is able to operate the gas to grid equipment.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]
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From: [REDACTED]
Sent: Monday, November 20, 2023 9:45 AM
To: [REDACTED]
Subject: Gas to grid connection

Hi [REDACTED]

I hope you had a nice weekend, just checking in to see how the commissioning went and confirmation if you are now exporting to the grid?

Thanks
[REDACTED]

From: [REDACTED]
Sent: Tuesday, November 14, 2023 4:55 PM
To: [REDACTED]
Subject: RE: Financial Provision calculations

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Hi [REDACTED]

Please find attached SGN commissioning documents.

The key primary document is the G2G NRO - this is scheduled for Thursday when the connecting pipework between site and the Evolve network is purged and compliant biomethane is injected into the grid.

This is due to commence 09:00 on Thursday and conclude at the end of the working day when the site will have the ability to export our compliant biomethane into the gas grid through the Remote Operating Valve in the BNEF.

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

Kind Regards

[REDACTED]
Group Head of SHEQ
BIO CAPITAL LIMITED

T
E

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From: [REDACTED]
Sent: Tuesday, November 14, 2023 4:08 PM
To: [REDACTED]
Subject: RE: Financial Provision calculations

Thank you

From: [REDACTED]
Sent: Tuesday, November 14, 2023 4:07 PM
To: [REDACTED]
Subject: RE: Financial Provision calculations

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Hi [REDACTED]

I've just requested this information from the projects team and will send over as soon as I receive it.

Kind Regards

[REDACTED]
Group Head of SHEQ
BIO CAPITAL LIMITED

T: [REDACTED]
E: [REDACTED]

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From: [REDACTED]
Sent: Tuesday, November 14, 2023 3:18 PM
To: [REDACTED]
Subject: RE: Financial Provision calculations

Hi [REDACTED]

Would it be possible to get a very simple overview of your commissioning plan and anticipated start date please?

Thanks

[REDACTED]

From: [REDACTED]
Sent: Monday, November 13, 2023 4:59 PM
To: [REDACTED]
Subject: RE: Financial Provision calculations

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Hi [REDACTED]

I hope you had a good weekend.

Further to our discussion on Friday, I was wondering if you were able to confirm that we can commence commissioning of the BNEF on 16/11/23?

Kind Regards

[REDACTED]
Group Head of SHEQ
BIO CAPITAL LIMITED

T: [REDACTED]
E: [REDACTED]

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From: [REDACTED]
Sent: Thursday, November 9, 2023 5:31 PM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: RE: Financial Provision calculations

Hi [REDACTED]

I hope you are well.

Following your feedback, we have reviewed the financial provision and updated it line with your requests below and the examples in appendix 2 of the guidance. This has resulted in us increasing the financial provision as detailed in the attached.

If you require any further information or would like to discuss further, please let me know.

We are looking to start commissioning of the BNEF on 16/11/23. If there is any additional information I can supply, or clarifications, to allow the varied permit to be determined and issued to us on, or, before this date please let me know.

Your assistance on this matter would be very much appreciated.

Kind Regards

[REDACTED]
Group Head of SHEQ
BIO CAPITAL LIMITED
T: [REDACTED]
E: [REDACTED]

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From: [REDACTED]
Sent: Monday, October 30, 2023 11:48 AM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: Financial Provision calculations

Hi [REDACTED]

We have reviewed your financial provision with respect to the [NIEA policy of financial provision](#), we need a bit more background information. I have highlighted the relevant sections of portions of the text from the guidance below:

2. Executive summary

.... Non-landfill activities must apply a simple indicative formula based on the appropriate management of waste tonnages **and restoration/remediation costs**, to calculate the amount of financial provision

3. Summary of Revisions to the Policy

- The calculation of FP for non-landfill activities will be extended to **include, a restoration sum to cover the cleaning of buildings, yards, drains, wider contamination issues** e.g. land contaminated with solid or liquid waste etc, if the operator ceases to operate for any reason or wishes to surrender the licence/permit.

6. Financial Provision for Non-Landfill Activities

For non-landfill waste management activities, NIEA will accept that the applicant is in a position to make financial provision if, they can demonstrate they have sufficient financial means to fund the requirements of the licence. This amount will be based on the figures determined through the calculation method outlined below.

Calculation of the amount of financial provision for non-landfill activities.

The amount of FP will be based on the maximum permitted quantity of waste that, an operator can store on the site at any one time, under the terms of their licence/permit. This quantity has to be converted into the total costs to transport and deposit the material, at a suitably authorised waste management facility. Some waste types, such as, scrap metal, end-of-life vehicle components etc. may have a value and can be treated as an asset, with regard to this policy. This will remove these wastes from the calculation and will reduce the overall amount of FP the operator is required to have in place. **The calculation must also include a restoration/remediation sum, to cover the cleaning of buildings, yards, drains, or as required, wider contamination issues, if the operator ceases to operate for any reason, or wishes to surrender the licence/permit.** (see Appendix 1 and 2 for Example Calculations). There may be site / licence / permit specific circumstances, which will merit a different or an increased multiplier

being applied. There is a £700 minimum financial provision that must be demonstrated. NIEA may adjust this figure from time to time. NIEA requires the waste operator to review and submit their financial provision at least annually. NIEA may also request a review at any stage, depending on the circumstances of a facility. Where there is a dispute between NIEA and an operator, on either the amount or method of financial provision, NIEA will impose a figure and method of demonstrating financial provision. There is no form of appeal or adjudication.

Some examples are provided in Appendix 2 of the guidance.

Please take into consideration the reason for providing the financial provision is to cover the costs the NIEA would incur in the clean up, restoration and removal of wastes from the site should the operator go bankrupt etc with that in mind please calculate and re-submit your FP calculation to include:

- The cost of cleaning of tanks and all pipework at the site;
- Evidence of the figures you have quoted at today's prices. Please include the transport and deposit/disposal costs for the waste listed, including respective gate fees at an appropriate waste installation, ensuring it is a type of site that can accept the waste streams;
- The cost of removal and waste management option of waste and raw material chemicals (please list);
- The cost of removal of any fuels i.e. diesel;
- The cost of removal and waste management option of media from the scrubber i.e. carbon filter;
- The cost of cleaning and removal of the contents of interceptors;
- The cost of a CCTV survey of process and surface water drains;
- Shut down of CHP engines, and making safe of all equipment associated with the biomethane production plant;
- Staff costs to facilitate a stop and shut down, close and clean phase, including provision of a technically competent person.

If you wish to discuss I am happy to take a call or facilitate a meeting.

Thanks







From: [REDACTED]
To: [Lewis, Helen](#); [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: RE: Granville Ecopark Enforcement Notice Stage 2 results
Date: 08 July 2024 14:03:23
Attachments: [image001.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.jpg](#)
[image002.png](#)

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Good afternoon Helen

We did want to discuss further with you on Wednesday the use of these results for assessing compliance against our permit ELVs. It has come to our attention that although sampling was conducted in line with UKAS accredited standards, Silsoe Odours are not MCERTS accredited. Therefore, the report hasn't been published with documented measurement uncertainties. It is our understanding in order to determine compliance against an ELV the measurement uncertainties have to be assessed. The methods that have been used for H2S and NH3 are not Standard Reference Methods or approved alternative methods. It was our understanding that rather than assessing compliance against ELVs the survey was to provide indicative data of where odour issues are.

We wanted to discuss with you on Wednesday future sampling surveys, including accreditations and methodologies.

We welcome your thoughts and whether you agree with our interpretation of the use of this data for compliance against ELVs.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]

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From: Lewis, Helen [REDACTED]
Sent: Monday, July 8, 2024 1:27 PM
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: Granville Ecopark Enforcement Notice Stage 2 results

[REDACTED] - good afternoon.

Please supply a Schedule 6 notification this afternoon as per conditions 1.2.2, 5.3.1, 5.3.2 and Schedule 6 of your permit.

Kind regards, Helen

From: [REDACTED]
Sent: Friday, July 5, 2024 4:52 PM
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: Re: update on procedures / information from odour monitoring days / enforcement notice

Hi Helen

I'm well thank you, I hope you are also.

Wednesday afternoon works well and I've sent you an invite for a Teams meeting.

Please find attached the interim report from Silsoe Odours for discussion next week.

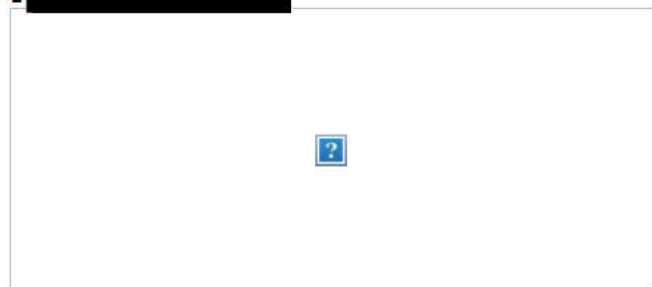
We understand the requirement for the NIEA to be present at any future odour surveys.

Kind regards

Kind Regards

[REDACTED]
Group Head of SHEQ
BIO CAPITAL LIMITED

T
E [REDACTED]



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From: Lewis, Helen [REDACTED]

Sent: Friday, July 5, 2024 9:34 AM

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

Subject: RE: update on procedures / information from odour monitoring days / enforcement notice

[REDACTED] good morning, I hope you are keeping well.

I am available for a teams meeting Tues or Wednesday afternoon if that is any help?

In the meantime please provide me with a copy of the interim results. This will enable us to discuss your investigations and the corrective actions you intend to carry out.

As before if more testing is carried out I will require an NIEA officer present, but we can discuss this next week.

Kind regards, Helen

From: [REDACTED]
Sent: Thursday, July 4, 2024 4:56 PM
To: [REDACTED] >; [REDACTED]
[REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: RE: update on procedures / information from odour monitoring days / enforcement notice

Hi [REDACTED]

I hope you are well.

We have received the interim odour characterisation report from Silsoe Odours. However, we have some concerns regarding the accuracy of the results and that they may be erroneous. This concern is on the basis that some of the results do not align with previous test results, particularly our biannual testing of the OCU. We are currently investigating these results and any possible corrective actions that we need to take.

We would like to discuss extending the submission deadlines for this survey as we would like to carry out another sampling event in order to verify these results.

Do you have any availability next week for a meeting to discuss further? We have broad availability on Tuesday 09/07 and Wednesday 10/07.

Kind regards

[REDACTED]
Head of SHEQ
BIO CAPITAL LIMITED

E: [REDACTED]



Hertfordshire, SG9 0RU

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From: [REDACTED]
Sent: Wednesday, July 3, 2024 4:37 PM
To: [REDACTED]; [REDACTED]
[REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
Cc: Lewis, Helen [REDACTED]
Subject: update on procedures / information from odour monitoring days / enforcement notice

Hi everyone,

I am following up on some information requests over the past few weeks, can you give me a date for when I will get the information through for the below:

1. Information regarding site operations on 18 and 19 June – discussed on 19 June at site meeting and followed up by an email dated 25 June.
2. Procedures related to OMP requested by email on 27 June.

And finally, the date the odour report by the independent expert on the characterisation and quantification of all major point and fugitive odour sources was due on 30 June as noted on the enforcement notice, we allowed an extension for the GCMS speciation to be submitted at a later date (19 July via email on 20 June) so we don't expect a finalised report but would appreciate seeing the first draft.

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]
Cc: [REDACTED]
Subject: RE: Granville Ecopark Limited - Further Information Notice: P0413/12A/V3-FN001
Date: 05 September 2025 16:28:02
Attachments: [image002.png](#)
[image003.png](#)

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

Hi [REDACTED]

Received, thank you.

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: 05 September 2025 15:54

To: [REDACTED]; [REDACTED]

Cc: [REDACTED]; [REDACTED]

[REDACTED] >

Subject: Granville Ecopark Limited - Further Information Notice: P0413/12A/V3-FN001

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Hi [REDACTED]

In follow-up to [REDACTED] visit last week see attached a request for information notice.

Please note the reply date of **12noon 10th September 2025**.

If you have any issues or queries, please get in touch.

Regards

[REDACTED]

[REDACTED] [REDACTED]

Industrial Pollution and Radiochemical Inspectorate

Northern Ireland Environment Agency

17 Antrim Road

Lisburn

BT28 3AL

Tel: [REDACTED]



From: [Lewis, Helen](#)
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: Method of demonstrating Financial Provision Granville Ecopark LTD P0413/12/A
Date: 02 October 2024 09:10:00
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.jpg](#)

[REDACTED] many thanks.

I am still working on finalising variation 3 for you, I'm afraid I have been diverted to other work. I shall endeavour to get this issued as soon as possible.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: Monday, September 30, 2024 10:28 AM
To: Lewis, Helen [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]
[REDACTED]
Subject: RE: Method of demonstrating Financial Provision Granville Ecopark LTD P0413/12/A

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

Good morning Helen

We will complete the template and return to you ASAP.

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: Lewis, Helen [REDACTED]

Sent: 27 September 2024 12:18

To: [REDACTED]; [REDACTED]

Cc: [REDACTED]; [REDACTED]; [REDACTED]

[REDACTED]; [REDACTED]; [REDACTED]

[REDACTED]

Subject: Method of demonstrating Financial Provision Granville Ecopark LTD P0413/12/A

[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]

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

[REDACTED]; [REDACTED]; [REDACTED]

[REDACTED]; [REDACTED]; [REDACTED]

[REDACTED]

Subject: RE: CM: RE: Schedule 6 request and outstanding actions

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: [REDACTED]

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]; [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.

Thanks

[REDACTED]

From: [REDACTED]
Sent: Thursday, September 5, 2024 4:13 PM
To: [REDACTED]
Cc: Lewis, Helen [REDACTED]; [REDACTED]; [REDACTED]
Subject: CM: RE: Schedule 6 request and outstanding actions

Hi [REDACTED]

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]
Cc: Lewis, Helen [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
E

[Redacted]

A close-up of a logo? Description automatically generated



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 Ashleigh will be going on maternity leave next month, and so from Monday 23 September 2024, [REDACTED] will be your inspector. Please copy Chris 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]



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

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 digestor will be cut.
 2. If/and or Foam radar sensor triggers 95% the feed to the digestor 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 digestor will be cut.
5. If/and or Foam radar sensor triggers 95% the feed to the digestor 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:
 - Its acknowledged by site staff &
 - the deviation that triggered the alarm is resolved (eg pump tripping)

Speak soon

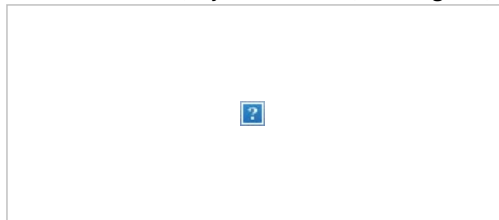
[REDACTED]

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]
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]; [REDACTED]
Cc: [Lewis, Helen; Cummings, Philip](#)
Subject: RE: note of meeting to discuss odour report on 17 May 2024
Date: 31 May 2024 14:53:11
Attachments: [image002.png](#)
[image004.jpg](#)
[image001.png](#)
[P0413 Granville Eco Park meeting to ~ report proposal from enforcement notice 17 May 2024 \(002\).docx](#)

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Hi [REDACTED]

Please find attached minutes with some minor comments.

We will provide notice of the Silsoe odour survey to you next week.

Have a good weekend.


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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From: [REDACTED]
Sent: Thursday, May 23, 2024 3:11 PM
To: [REDACTED]; [REDACTED]
[REDACTED]; [REDACTED]
Cc: Lewis, Helen [REDACTED]; Cummings, Philip [REDACTED]
[REDACTED]
Subject: note of meeting to discuss odour report on 17 May 2024

Hi [REDACTED]

Please see our draft note of the meeting on Friday, could I ask you to come back to me by next Friday (31st May) with any comments or proposed changes.

Could we please request notice of Silsoe odour survey to allow for an NIEA representative to attend site and witness tests under normal operational conditions.

Thanks

[REDACTED]

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

T: [REDACTED]
E: [REDACTED]

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From: [REDACTED]
To: [REDACTED]
Subject: RE: Odour complaint - gas smell 18/4/2024
Date: 19 April 2024 17:57:57
Attachments: [image002.png](#)
[image003.png](#)
[E4 - Odour Complaint Investigation Form 18-04-2024.pdf](#)

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Hi [REDACTED]

Please see attached completed E4 form with the details and data requested.

If you have any queries please let me know

Thanks

[REDACTED]

[REDACTED]

Plant Manager
GRANVILLE ECO PARK LIMITED

T: [REDACTED]
E: [REDACTED]

<!--[if !vml]--><!--[endif]-->A: Granville Industrial Estate, Granville Rd, Granville, Dungannon, BT70 1NJ



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From: [REDACTED]
Sent: Thursday, April 18, 2024 2:24 PM
To: [REDACTED]; [REDACTED]
Subject: Odour complaint - gas smell 18/4/2024

Hi [REDACTED]

We received an odour complaint from a resident to the NE of your site today about a very strong gas odour from approximately 7.30am – 11am.

Could you please provide the following information:

- SCADA read out of the pressure across the system
- Flare usage
- Any maintenance works on the gas to grid system, CHPs or PRVs
- If any gas was being sent to the grid today

- Any abnormal activities on site today other than the soup tank clean out

Thanks

[REDACTED]

[REDACTED]

Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn

T: [REDACTED]

E: [REDACTED]

DAERA Signature Strip New 2020 Green



From: [REDACTED]
To: [REDACTED]; [REDACTED]
Subject: RE: Odour complaint 3 August 2024 at 10.40am
Date: 09 August 2024 12:27:56
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[F4 - Odour Complaint Investigation Form 04-08-2024.pdf](#)

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Hi [REDACTED]

Apologies I thought this was attached to my first email the other day.


Please see attached the odour response.

Any issues please let me know.

Kind Regards

[REDACTED]
Interim Plant Manager
GRANVILLE ECO PARK LIMITED
T: [REDACTED]
E: [REDACTED]
<!--[if !vm]--><!--[endif]-->A: Granville Industrial Estate Granville Rd Granville Dungannon BT70 1NJ

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From: [REDACTED]
Sent: Monday, August 5, 2024 4:38 PM
To: [REDACTED]; [REDACTED]; [REDACTED]
Subject: Odour complaint 3 August 2024 at 10.40am

Apologies – the complaint was received on Saturday 3rd rather than Sunday 4th – my mistake

From: [REDACTED]
Sent: Monday, August 5, 2024 11:10 AM
To: [REDACTED]; [REDACTED]; [REDACTED]
Subject: CM: Odour complaint 4 August 2024 at 10.40am

Good morning

We received an odour complaint from a local resident to the NE of your site yesterday morning (4th August at approx. 10.40am) stating:

The odour coming from this plant is extremely sickening. It's been evident for some hours now.

Can you please investigate and come back to me with your findings.

Due to your overflow incident this morning I would like to see the following as part of your investigation alongside the usual odour surveys, abnormal operations / maintenance work checks and pressure checks that you send through:

Photograph of site diary for 3rd and 4th August
Summary of waste received to site on 3rd and 4th August

Thanks

[Redacted]

[Redacted]

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

A close-up of a logo [Redacted] Description automatically generated



From: [REDACTED]
To: [REDACTED]; [REDACTED]
Subject: RE: Odour complaint 3/7/2024 from resident to NE of site
Date: 05 July 2024 17:25:47
Attachments: [image002.png](#)
[image003.jpg](#)
[E4 - Odour Complaint Investigation Form 03-07-2024.pdf](#)

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

Hi [REDACTED]

Please see attached completed E4 form for the complaint on Wednesday 3rd July 2024.

If you have any queries please let me know

Thanks

[REDACTED]

[REDACTED]
Plant Manager
GRANVILLE ECO PARK LIMITED

T: [REDACTED]
E: [REDACTED]

<!--[if !vml]--><!--[endif]-->A: Granville Industrial Estate, Granville Rd, Granville, Dungannon, BT70 1NJ



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From: [REDACTED]
Sent: Wednesday, July 3, 2024 4:50 PM
To: [REDACTED]; [REDACTED]
[REDACTED]; [REDACTED]
Subject: Odour complaint 3/7/2024 from resident to NE of site

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]

[REDACTED]

Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL

T: [REDACTED]

E: [REDACTED]

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From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Odour complaint 8/5/24 at 2.15pm
Date: 10 May 2024 15:41:49
Attachments: [image002.png](#)
[image003.jpg](#)
[E4 - Odour Complaint Investigation Form 08-05-2024.pdf](#)

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

Hi [REDACTED]

Please see attached E4 investigation form for you records. If there are any queries or questions, please let me know

Thank you

[REDACTED]

[REDACTED]

Plant Manager
GRANVILLE ECO PARK LIMITED

T: [REDACTED]

E: [REDACTED]

<!--[if !vml]--><!--[endif]-->A: Granville Industrial Estate, Granville Rd, Granville, Dungannon, BT70 1NJ



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From: [REDACTED]
Sent: Thursday, May 9, 2024 12:14 PM
To: [REDACTED]
Subject: RE: Odour complaint 8/5/24 at 2.15pm

Hi [REDACTED]

Thanks for the update

[REDACTED]

From: [REDACTED]
Sent: Wednesday, May 8, 2024 6:11 PM
To: [REDACTED]; [REDACTED]
Subject: RE: Odour complaint 8/5/24 at 2.15pm

Hi [REDACTED]

I spoke with [REDACTED] and called with him as I was out and about the industrial estate when he called.

I completed a survey downwind of the industrial estate and didn't note anything other than typical faint odours, however I did note a particularly strong odour downwind of Westland's main gate opposite the back of the animal feed mill- it was an intense odour which I noted H2S and a similarity to strong mixing slurry/ manure smell. I then called with [REDACTED] and we were not able to pick up any further odours in his yard or in the immediate area after this point. Following my discussion with him I did another survey of the industrial estate and I could not trace the odour previously noted that I suspect [REDACTED] detected.

We will pull together our checks and findings from onsite operations and forward within our investigation however at this point I can confirm we had no issues or variances in operation leading to the odour sourcing from GECO.

Any queries or questions at this point, please let me know. Also I will come back to you tomorrow regarding date for CAR inspection- apologies for the delay!

[REDACTED]

[REDACTED]
Plant Manager
GRANVILLE ECO PARK LIMITED

T: [REDACTED]
E: [REDACTED]

<!--[if !vml]--><!--[endif]-->A: Granville Industrial Estate, Granville Rd, Granville, Dungannon, BT70 1NJ



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From: [REDACTED]

Sent: Wednesday, May 8, 2024 5:02 PM

To: [REDACTED]; [REDACTED]

[REDACTED]

Subject: Odour complaint 8/5/24 at 2.15pm

Good afternoon [REDACTED] [REDACTED]



I understand you received a complaint from [REDACTED] today regarding odour from your site, he also contacted IPRI with this complaint about a gas type odour with a sweetness to it, as such can I please request a copy of your odour investigation for review and our records.

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]
Cc: [REDACTED]
Subject: RE: Odour complaint 13/3/24
Date: 15 March 2024 16:34:43
Attachments: [image005.png](#)
[image001.png](#)
[E4 - Odour Complaint Investigation Form 13-03-2024.pdf](#)

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

Hi [REDACTED],

Please see attached the E4 investigation form for Wednesday 13th March 2024.

The site team completed an external odour survey during the time of the complaint and noted a number of strong odours. Can you confirm if other regulated sites within the industrial estate have been requested to carry out investigations also?

Thanks

[REDACTED]

[REDACTED]

Plant Manager
GRANVILLE ECO PARK LIMITED

T: [REDACTED]
E: [REDACTED]

<!--[if !vml]--><![endif]==>A: Granville Industrial Estate, Granville Rd, Granville, Dungannon, BT70 1NJ



Registered No. NI061353

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From: [REDACTED]
Sent: Wednesday, March 13, 2024 4:35 PM
To: [REDACTED]; [REDACTED]
[REDACTED]
Subject: Odour complaint 13/3/24

Good afternoon

IPRI have received a complaint from a resident to the NE of your site describing a gas / ammonia type odour on/off from around 8.30am until about 11am this morning.

Could you please provide your investigation into this complaint.

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:

E:

[DAERA Signature Strip New 2020 Green](#)



From: [REDACTED]
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]
Subject: RE: odour complaint 15/9/2024
Date: 16 September 2024 14:43:55
Attachments: [image002.png](#)
[image003.jpg](#)

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

Hi [REDACTED]

Its good to hear from you. Trust you had a good weekend. [REDACTED] is on holiday so I will reach out to site and get this information to you.

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: 16 September 2024 14:39
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: odour complaint 15/9/2024

Good afternoon

IPRI received an odour complaint attributed to your site from a resident to the NE of your site at approximately 8.55am on 15/9/2024:

"We are experiencing extremely sickening odours from the B9 plant today. We awoke to the odour instead rooms in our home."

Can you please complete your own odour investigation and provide us with the following:

Photograph of your site diary from 15/9/2024

Waste received on site on 15/9/2024

Screenshot of SCADA showing pressure across the site on 15/9/2024

Any abnormal situations or maintenance work underway on 15/9/2024

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]
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: RE: odour complaint 26/6/2024 starting at 1pm
Date: 28 June 2024 17:23:21
Attachments: [image002.png](#)
[image004.png](#)
[image005.jpg](#)
[image003.png](#)
[E4 - Odour Complaint Investigation Form 26-06-2024.pdf](#)

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

Hi [REDACTED],

Apologies for the delay.
Please see attached.

Kind Regards,
[REDACTED]

SHEQ Manager Northern Ireland
BIO CAPITAL LIMITED

T: [REDACTED]
E: [REDACTED] -

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



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From: [REDACTED]
Sent: Wednesday, June 26, 2024 4:26 PM
To: [REDACTED]
Subject: odour complaint 26/6/2024 starting at 1pm

Hi [REDACTED]

As discussed, we received a complaint regarding odour from a resident to the NE of your site starting at approximately 1pm today describing an odour of burning meat / fish, coming

and going up until 4pm. Can you please investigate and come back to me with a response, thank you.

[REDACTED]

[REDACTED]

Senior Chemicals Inspector
Chemicals Team
Industrial Pollution and Radiochemical Inspectorate
17 Antrim Road
Lisburn
BT28 3AL

T: [REDACTED]
E: [REDACTED]

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