

# Is Compliance working for you?



**Avril Banks**



# The Start

- Planning
- Grid connection
- Funding



**Congratulations you have bought a biogas plant**

- Manic construction phase to get in before tariff degression



# That Old Devil Compliance creeps in



# Waste & Farm Systems



# Is your New plant Compliant?

## Who's responsibility


- Owner
- Operator
- Technology provider
- Planners
- EA

Hazop  
Atex Zoning  
Emergency Procedures  
Containment  
DSEAR  
O & M  
Biology

## What level of responsibility does/should each party have?



# Process

- Needs to start before the plant is built
- Manuals
- Hazop before construction – involvement  
**Engagement, communication & understanding**
- Ongoing EMS & procedures development
- Degression rush !!! 



# Hazop

## Hazard & Operability Analysis

- Systematic identification of hazards
- Risk assessment
- Procedures to manage these
- Usually pre-construction
- Provides a clear understanding of how to manage any situation? But often at start of operation



Are your processes  
still relevant

Communication & Review



# Atex Zoning

- Understanding of gas – O<sub>2</sub> deficient, LEL, H<sub>2</sub>S



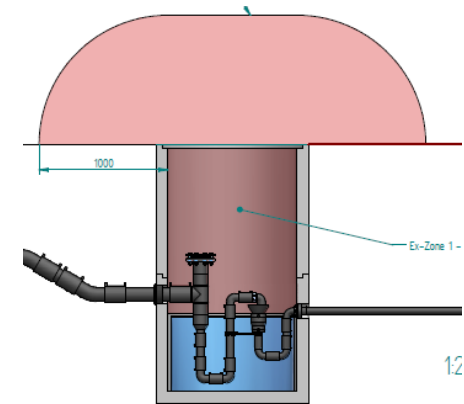
Confined spaces – differing opinions of what is a confined space



Differing views on Atex Zones

- Guidance for regulators & operators
- Monitors – personal and site

## Communication & Training





# Emergency procedures

- Site specific – Generic is not acceptable
- No good if not communicated
- Easy to read – easy to find
- On site training
- Review process



 How much best practice help is around

- Industry needs to share

## Communication & Review



# DSEAR

---

STATUTORY INSTRUMENTS

---

- **DSEAR assessment**
- **Site specific**
- **Understanding of the AD industry**
- **Technical & operational information**
- **Changing regulation and guidance**

2002 No. 2776

HEALTH AND SAFETY

The Dangerous Substances and Explosive Atmospheres  
Regulations 2002



**Varying reporting standards**



# You'll need a permit

- **Very different experiences**
  - Environmental Permitting Regulations 2010
- **EID – industrial emissions directive >100t**
- **Standard Rules No.10**
  - On-farm anaerobic digestion facility using farm wastes only
- **No permit at all if you don't take wastes!**



# Your Permit

- Tells you what outcomes are required
- But not HOW do you meet it
- Where do you find the info



**Big gap**

- New guidance now being published but only after the rush for the last degression



# Containment

## Why is containment not a requirement of planning

- Site design
- Retro fit ££
- Level playing field?
- Emergency procedures including gas management



# Technical competence COTC

- Waste sites – employ staff
- Farm systems – existing farm personnel
- How do you achieve this with no experience of the waste industry



**How do you get trained**

Landfill Gas  
PAS110  
HACCP (Hazard Analysis &  
Critical Control Point)



# Training routes

 EPOC – relevance to AD?

 WAMITAB? – how much help?

- Increasing level of awareness on biological management
- Should industry bodies be developing more tools for review above EA guidance

**Mentoring**



**Standard  
Tool box  
talks**



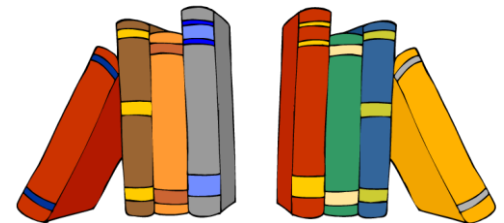
# EMS – Environmental Management System

- You paid for it now make it work for you
- What is put in place at the beginning rarely stands the test of actual operation

Oh I had one of those done

## REVIEW

- Ongoing amendments
- DO NOT ACCEPT PDF'S





# Understand

- Data gathering not just for compliance
- What does that data tell you
  - Ampage
  - Gas readings
  - OLR
  - Biological performance
  - Plant efficiency
- Cost reduction – particularly where feedstock is a cost



# Write it down

- Don't just rely on auto generated data

*Site personnel writing it down  
on site or inputting data  
reinforces it and adds  
engagement & understanding*



# Compliance Helps

- **Developing your EMS to suit your needs**
  - Clear concise and tailored to your site and operation requirements
  - Engenders greater ownership of the process not just via the cost of the plant
- **Review procedures & documentation regularly**
- **Optimised performance & reduced costs**



**Avril Banks**

**Ab-En Ltd**

**[Avril.banks@ab-en.co.uk](mailto:Avril.banks@ab-en.co.uk)**

**07980 692727**

 **@ab\_en\_uk**

