

## APPENDIX 1

### Correspondence

100 2003

Our Ref: SS/SP/A.99 Env A  
Your Ref:

Please contact:  
Mrs Sheena Strachan

14 April 2003

Mr Stuart McGowan  
BMT CORDAH Ltd  
The Doherty Building  
Pentland Science Park  
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Edinburgh  
EH26 0PZ

Dear Stuart

**LAQM UPDATING AND SCREENING 2003  
SOURCES REGULATED BY SEPA**

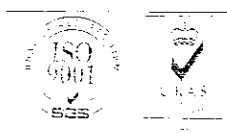
Further to your request for SEPA data relating to industrial sources of specified pollutants, I have collated lists of sources in the Moray Council area and forwarded them to you via email.

When interpreting the spreadsheets please note the following:

The "relevant LAQM pollutants" column refers to the substances advised in LAQM. TG(03) as being potentially significant from those industry sectors. Of course they may not be significant at each site and I have provided information as to whether SEPA holds relevant data or modelling relating to local releases.

The date of authorisation/permit has been included so that you can identify those new sources which have begun operating since the last round of review and assessment. In addition in the Moray Council area there has been a significant increase in the operating capacity of the animal waste incineration process at Douglasbrae Knackery, Keith. This results from the installation of two additional incinerators in 2001 and 2002 respectively.

Because of the nature of pollution control legislation, little numerical data is required by SEPA to carry out its regulatory functions in respect of Part B authorised processes. Much of the data which is collected relates to compliance demonstration of emission limit values based on intermittent monitoring of the concentration of substance released, to check for on-going efficiency of abatement equipment for instance. I have however listed the principle Process Guidance note for each process so that the emissions calculations in the LAQM technical guidance can be applied if necessary. There is currently no significant non-compliance with emission limit values at any of the SEPA-regulated sites locally.



Dr Ken Collins

Dr Campbell Gemmell

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Please note that the only quarrying activities authorised by SEPA are the use of crushing and screening plant and roadstone coating operations. The removal and storage of overburden and the blasting of rock from the quarry face are not prescribed processes and control of fugitive emissions of dust from these processes is not included in Part B authorisations. SEPA does hold annual monitoring data from point sources such as bag filter systems on site but the measurements relate to total particulate and not specifically the PM10 fraction. This is also true of cement batching processes. There may however be other relevant information within the application and authorisation which would be of use to you in your assessment of the significance of the source, for example the type of fuel used in roadstone coating, conditions relating to control of dust from haul roads, the relative position of cement silos etc.

There are a significant number of service station operators holding Part B authorisations in the area as a result of the requirement to fit and use petrol vapour recovery systems for loading and unloading into and from storage tanks at such premises. None of these has Stage 2 controls in use at the pump. At the time of application for authorisation, SEPA acquired annual throughput information for the previous three years to ascertain into which size banding and associated application deadline each service station fitted. However it is not necessary for SEPA to keep this information on an on-going basis and many operators did not give specific information at the time. The Moray Council Petroleum Licensing Officer ought to have current information and indeed was helpful in providing it to SEPA previously. If there are any service stations for which you need additional information, in accordance with LAQM. TG(03), please contact me and I will check individual files to see whether the information is held.

The spreadsheet describes the waste type licensed for each landfill site regulated by SEPA. This will be the principle guide as to the likelihood of relevant fugitive dust emissions. Again specific data on PM10 release is not held by SEPA for landfill sites but if other information about any of these facilities is of interest to you in carrying out the updating and screening exercise please let me know.

If you feel that any of the industrial sources meet the LAQM. TG(03) criteria for relevant exposure and you therefore require more detailed information please contact me again, quoting the relevant operator name and authorisation/permit reference number.

I would welcome any comments you may have about the layout, content or practicality of the spreadsheets and therefore look forward to an on-going exchange of information during the updating and screening exercise.

Yours sincerely



SHEENA STRACHAN  
AIR QUALITY AND NOISE CO-ORDINATOR

cc: George Murray, The Moray Council