Newhurst Energy Recovery Facility

Local Liaison Committee (LLC) Meeting

Monday 4th July 2022

from 1730 to 1930 face to face and by Zoom

Agenda

PLEASE NOTE THIS MEETING WILL BE IN PERSON AT THE NEWHURST SITE

Apologies:

1.	Minutes of the previous meeting	**All**
2.	Matters arising not on the agenda	**All**
3.	Team Introductions & recruitment update	**Covanta/Biffa**
4.	Construction update	**Covanta/Biffa**
5.	Planning Update	**Covanta/Biffa**
	5.1 Progress on heat offtake route	
6.	Date of next meeting	**Chair**
7.	AoB	**All**

NEWHURST ERF LOCAL LIAISON COMMITTEE (LLC) MEETING NOTES

MEETING HELD 4TH JULY 2022, 1730 (IN PERSON AND BY ZOOM)

In attendance:

Ms Becky Knighton	Leics. County Council
Ms Marie Dickinson	Leics. County Council
Mr Charlie Harris	Environment Agency
Mr Rob Harrison	Environment Agency
Mrs Julia Howard	Local Resident
Coun. Christine Radford	Leicestershire County Council
Cllr Peter Grainger	Shepshed Town Council
Mr. Peter Cunnington	Local Resident
Mr. Kenneth King	Local Resident
Mrs Mary Tappenden	Covanta/Biffa
Councillor Max Hunt	Leicestershire County Council
Mr. David Spencer	Covanta
Mr. Craig Burdis	Covanta
Dr David Best	Independent Facilitator
Mr. G Newborough	Local Resident
Mr. John Orchard	Covanta/Biffa
Mrs. Ann Green	Charnwood District Council (EHO)
Mr. Jim Thompson	Covanta
Mr Iain Cook	Covanta

Apologies for absence: Coun. Jane Lennie, Ms Jane Hammersley, Coun. John Savage, Dr Landy Yang, Mr Mark Needham, Mr Peter Wood.

Disclaimer: Membership of the LLC does not imply either support for, or objection to, the Newhurst Energy Recovery Facility (ERF) development. Rather it is an opportunity to facilitate the flow of information between the developer and local communities and vice versa.

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1. Welcome

1.1. **David Best** welcomed members to the meeting. New attendees introduced themselves: **Mr Iain Cook**, as the newly appointed Operations General Manager for the Newhurst site, **Mr Harris** from the Environment Agency, together with his colleague, **Mr Rob Harrison** attending for the purposes of familiarisation and **Ms Marie Dickinson** of Leics. CC Planning Department as a colleague of **Ms Becky Knighton** also of Leics. CC.

1.2. A copy of the papers circulated with the agenda will be available on the Newhurst ERF website in the coming days.

1.3. DPB stated that the meeting would be recorded to help prepare the meeting notes, but the recording would be deleted once these were approved at the subsequent LLC meeting. The transcript would not be published.

The community engagement page of the site is here:

2. Minutes of the Previous Meeting.

2.1 These had been previously circulated. These were approved and have been posted to the website in the usual way.

3. Matters Arising not on the agenda.

There were none. A previously raised issue regarding reporting of emissions data would be considered under AOB.

4. Construction Update.

Mr. Burdis presented the construction update, using a slide deck which will be available on the web site and the link to which is https://info.covanta.com/newhurst#communityengagement

4.1 Key points:

4.1.1 87% of construction is now complete (April 71%) with the project now 90% complete overall and on time. Significant and visible progress can be seen in the cladding and the build of the elements of the site. Progress over the last three months has included: Erection of the Building Envelope including steelwork and cladding; M&E Contractors have completed installation of the Combustion equipment, Flue Gas Treatment and Water Steam Cycle equipment. The Electrical and Piping subcontractors have made progress with the installation of the Turbine Generator continuing.

4.1.2 Energisation of the 132kV grid connection was completed in early June, and the Commissioning Team have mobilised on site, whilst the Operations & Maintenance Team have commenced their training

4.1.3 30% of systems are mechanically and electrically complete and handed over to commissioning team ready for energization. Cold Commissioning has just begun and is on schedule.

4.1.4 Approximately 400 operatives are now working on site, and the numbers have begun to reduce slowly as work packages are completed. The project has achieved 1m hours work since the previous lost time incident. This is equivalent to one person working full time for 400 years.

4.1.5 The Covid 19 Action plan remains in place and is working effectively to prevent and manage incidence of the virus. Less than ten cases have been recorded since before Christmas helped by the fact that the majority of the work is outside, reducing the spread of the virus.

4.1.6 Photographs recording progress since April are provided in the construction update deck on the Community Engagement pages of the Newhurst website. Further visuals are likely to be provided on the basis of the original model used in the planning process to further illustrate the way in which the as-built plant is as-designed.

4.2 Next three months planned activities:

- Cladding of the Building Envelope will continue.
- Electrical and Piping subcontractors will complete installation.
- Installation of the Turbine Generator will be completed.
- The landscape commissioning will begin with topsoil placement, planting and landscaping increasing.
- Cold commissioning activities will continue.
- Steam Blowing activities are planned for September to ensure clean pipes throughout the plant.

4.3 Recruitment.

Mr Thompson reported that the Operations team recruitment was progressing well with a total of 29 appointments, 14 of them in July. He anticipates being at full strength in the coming weeks.

4.4 Hot commissioning with the arrival of the first waste would begin in October.

4.5 Questions on Construction Update.

Mrs Howard asked if a view from the South from the M1, and from Ingleberry would also be possible using the visualization model and some current photographs. This would be explored.

Mr Newborough asked if the positioning and height of the pylons carrying the electric cables were as set out in the permit. **Mr Burdis** explained that this was a Development matter approved by Charnwood District not by the County Council and was the responsibility of Western Power Distribution. It had been necessary to increase the height of the foundation platforms of the pylons to provide the necessary clearance and the connection routes to Coalville and to Ratcliffe on Soar.

5. <u>Permitting Update</u>

5.1 Mr Burdis reported on the Environmental permit pre-commissioning conditions which are detailed in the update deck with the status and responsibility against each one. Members of the Committee are encouraged to review these and forward any questions to David Best.

5.2 In respect of the reports that Covanta had submitted to the authorities as part of their compliance with permits **Councillor Hunt** asked if it was the case that the submitted reports were online or in the public domain. **Mr Harris** responded that when they were at firm application stage, they could be made available on request They were not online however, and early or draft versions were not available publicly since they were often changed and were, at that

point, in discussion between the Agency and the Developer. **Mr Burdis** said that with regard to the Fire Strategy the main points were contained in his presentation to be discussed later in the meeting. In relation to reporting permit activities **Mr Burdis** undertook to assess if there was a simple way of keeping the committee informed. It was noted that the Permit had been transferred to Covanta.
5.3 The description of the various elements of the permit and the status of each are contained in the presentation provided by Mr Burdis and which can be found **HERE**

6. Planning Update.

Mrs Tappenden reported:

- An update on the previous discussion about the soil composition of the site which had been found to be Alkaline rather than acidic as had been assumed. A revised landscape scheme has now been prepared. The changes are principally a change in seed mixes and planting mixes. Th is to be provide to the County Ecologist and County Landscape team for comment before formal submission.
- The site will need a contractor's compound to allow for contractors who would on an infrequent, perhaps annual, basis require to be accommodated on site during periods when the plant is shut down for maintenance . The compound would be where the car park is now. The van park and approximately 60 of the existing car parking spaces would be retained. This will need planning permission and an application is currently in preparation. and will be submitted to LCC for approval .
- An aftercare scheme for the land controlled by Biffa outside the perimeter of the ERF was being developed and would be submitted by 31st December 2024 as required by the planning permission for the ERF.

Ms Knighton reported that from the point of view of the planning authority nothing else was outstanding at the date of the meeting.

6.1 Questions on Planning update

Mrs Howard asked about the background monitoring of air quality, and the baseline data that would be used. In discussion, it was noted that:

- 6 months monitoring was required preconstruction (in practice the monitoring continued for a period of 23 months)
- 6 months monitoring during the construction period is required. This was completed between July 2020 and February 2021 and monitoring recommenced in May 2022.
- 6 months would be undertaken post the commencement of operations. The monitoring stations installed in May 2022 will stay in place until 6 months after operations commence.
- Monitoring was of Nitrogen Dioxide only.

Mr Harris commented that since the monitoring was of the overall air quality it was not expected that the operation of the Newhurst facility would have any detectable impact on air quality overall.

Ms Knighton commented that data on HGV movements was required to be made available in compliance with the planning consent, **Mrs Tappenden** agreed, noting that this data would be available since all lorry traffic passed over the weighbridge.
Mr King asked why it was that the contractor compound had not been included in the original application. **Mr Burdis** replied that it was simply that there had not been an appreciation that this would be needed. Its use would be infrequent, possibly only once a year or perhaps once in two years. In future developments this facility would be planned in from the outset, now that it was clear that up to 60 contractor personnel may be on site at any one time in the event of a planned outage.

7. Operations and Maintenance Update

Mr Thompson reported on the activity to prepare for the beginning of operations. The current focus is on recruitment training and the procurement of equipment and supplies for the operation phase. Much effort is going into the writing of procedures for activities such as waste acceptance and the operating procedures of the plant.

Work was also being done on how to transition from construction – the project phase into operation and designing the hand over from one phase to the other. It might be appropriate to provide a brief presentation on Operations for future meetings. There would be an item on Waste acceptance procedures at the next meeting.

8. Discussion on CHP

In accordance with the decision to have a standing item on the heat offtake potential of the site, discussion took place on the current status. The meeting was reminded that the only requirement of the planning permission was the provision of a route for this, so that in the event of an agreement on heat offtake being reached, a physical route from the plant was available. The route identified is from the plant to the site entrance. The submission can be viewed at the following link: Planning application 2020/0072/02/CS/29 | Leicestershire County Council (planning-register.co.uk)
A feasibility study into the interested parties, and the feasibility of supplying heat had been completed and was being reviewed. This work was continuing. Mr Burdis provided a short presentation on CHP and heat offtake is available **HERE.** CHP reduces carbon emissions by generating heat and power simultaneously, compared to the separate means of conventional generation via a boiler and power station**.** The Newhurst site could technically feasibly export an annual average heat load of up to 17.77 MWth, and, when accounting for consumer diversity and heat losses, a peak load of 36.62 MWth. This assumes

however that the infrastructure at the user is available to provide efficient and economic connection for the consumption of the heated steam.
In discussion it was noted:
Coun. Hunt endorsed that steam was the most efficient means of conducting heat from the plant. However **(Mr Burdis**) this was only the case if the user was locally located and had the infrastructure in place to make use of the heated steam.
Preliminary discussions had occurred with **Loughborough University**, discussions were continuing.
Any developments in this area will be reported to the LLC as they occur.

9. Questions received previously

No questions had been received.

10. Date of Next Meeting

The next Meeting of the LLC will be held on Monday the 10th October **(Note Not the 3rd as mentioned at the meeting),** at a time to be agreed.

11. Any other business

Mrs Howard asked **Mr Harris** if data on emissions from the facility could be provided by the EA more quickly than the one month after the quarter end, and in addition asked how Charnwood DC would be kept informed in a timely fashion of any breach.

Mr Harris (EA) responded that in the event of a breach the operator must immediately inform the Environment Agency.) **Newhurst team** stressed in discussion that as responsible operators, Covanta would operate the facility within environmental limits. In the unlikely event that an environmental breach should occur Covanta will notify the EA within 24 hours, in accordance with Newhurst ERF Environmental Permit. **Mr Harris** further stated that the data about any event causing community impact would therefore be immediately known. Any local stakeholder with concerns should therefore contact the EA to notify or enquire if any events had occurred. **Mrs Ann Green** added that the District Council's monitoring activity extended far beyond the Newhurst site, and that they would use their existing channels of communication to ensure liaison with the EA on any matters of mutual community concern. **Mr Harris** stressed the importance of members of the community feeling able to contact the EA in case of concern and should members of the community wish to request information they should email emdenquiries@environment-agency.gov.uk. (Subsequent to the meeting Mr Harris also provided this link to be used regulatedindustrydnl@environment-agency.gov.uk).

In discussion of the monitoring data availability, **Mr Cook** and **Mr Burdis** agreed to look into the feasibility of making data available at the site and would provide an update at the October meeting. **Mr Newborough** asked who had the authority to close the site if needed. **Mr Harris** replied that such an eventuality was extremely unlikely but that they did have that authority. **Mr**

Burdis and **Mr Thompson** (Covanta) both stressed that the operations management on site would have taken steps to reduce output or shutdown the facility well before the EA needed to take such unusual action
Mr Cook told the meeting about the intention of Covanta to apply for a modification to the Environmental Permit to increase the tonnage of material being provided to the incinerator if the calorific value of the waste should fall as a result of increased recycling. It was stressed that any increase could be accommodated within the HGV limit on the current planning permission. . Consideration of this was at a very early stage and studies were still under way. The committee would be informed as the plans developed.

Postscript

1. Subsequent to the April meeting Mr Burdis had conducted a tour of the site for some members of the Committee. This tour was agreed to be extremely useful in informing the members of the layout and potential operation of the site.

2. The issue of these minutes has been delayed by a team member having Covid-19.

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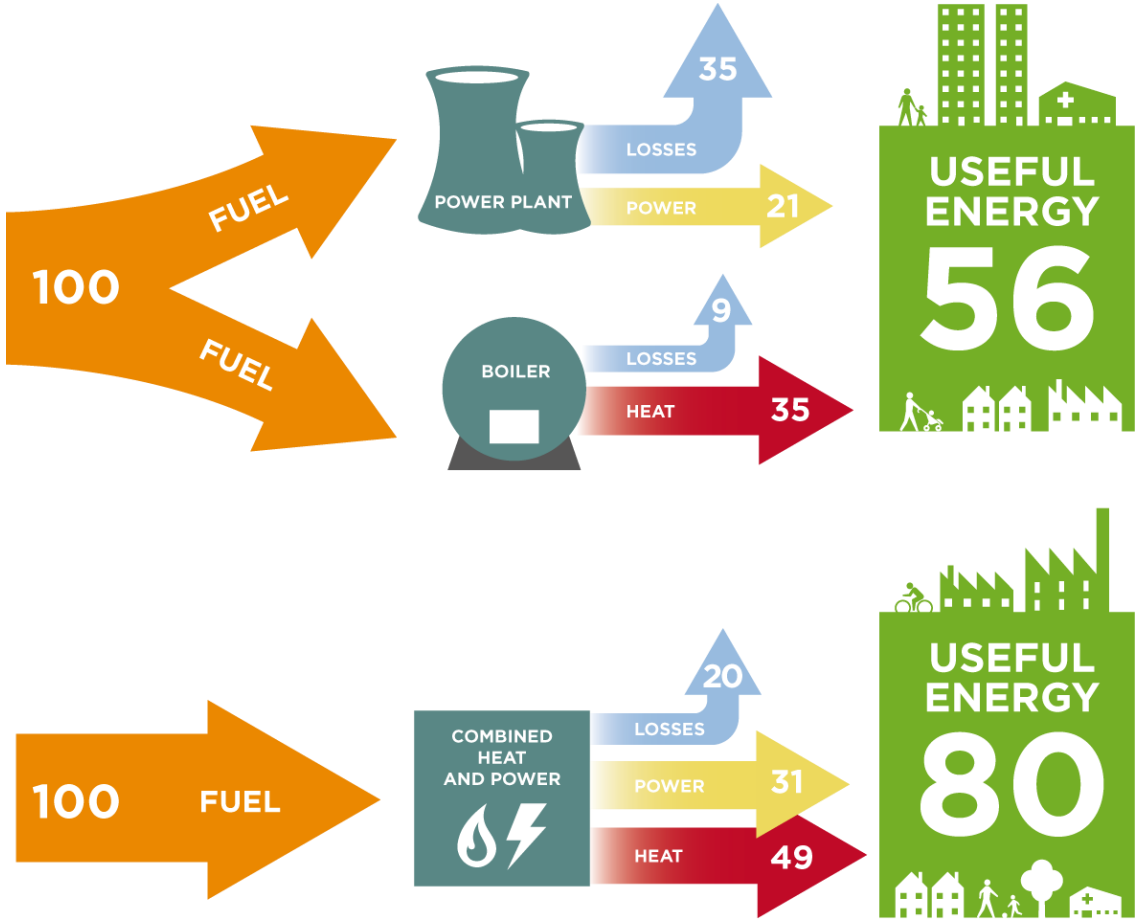
Newhurst ERF – Combined Heat and Power (CHP)

What is Combined Heat and Power (CHP)?

- CHP is a highly efficient process that captures and utilises the heat that is a by-product of the electricity generation process.
- This process makes use of the heat which would otherwise be wasted when generating electrical power.
- The heat could then be supplied in factories, residential homes and hospitals.
- CHP reduces carbon emissions by generating heat and power simultaneously, compared to the separate means of conventional generation via a boiler and power station.



Source: https://blogs.nottingham.ac.uk/sustainablenottingham/2016/09/29/12982/chp-diagram/

What is Combined Heat and Power (CHP)?

Heat is typically supplied from the energy recovery process in the form of steam and / or hot water, depending on the grade of heat required by the end consumers.

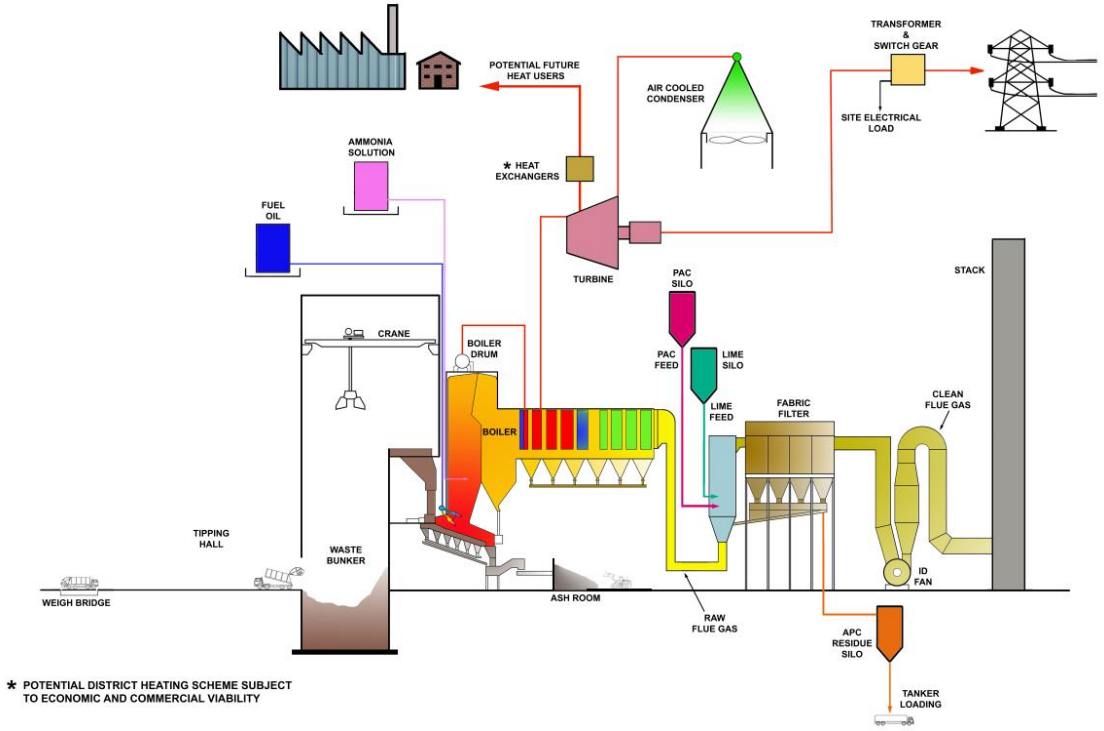
The most commonly considered options for recovering heat are:

1. **Heat recovery from the condenser –** wet steam emerges from the turbine exhaust typically at around 40°C. This energy can be recovered in the form of low-grade hot water from the condenser. Although this reduces the power output as it requires additional steam extraction to heat the condensate prior to being returned to the boiler.
2. **Heat extraction from the steam turbine -** Steam extracted from the steam turbine can be used to generate hot water for district heating schemes. District heating schemes typically operate with a flow temperature of 90 to 120 °C and return water temperature of 50 to 80 °C. Steam is preferably extracted from the turbine at low pressure to maximise the electrical power generated from the steam prior to extraction.
3. **Heat extraction from the flue gas -** Condensing the flue gas can be achieved in a flue gas condenser. However, the recovered temperature is typically no more than 80°C, which restricts the hot water temperature available for the consumer.

Newhurst ERF - CHP Study

- Following screening of potential heat consumers and development of a network heat demand profile, it has been established that technically feasible opportunities exist to export an annual average heat load of up to 17.77 MWth, and, when accounting for consumer diversity and heat losses, a peak load of 36.62 MWth.
- The Facility will be technically capable of meeting these heat loads, subject to economic feasibility. The maximum heat capacity of the Facility will be confirmed during commissioning and will be set as a minimum to meet the requirements of the heat consumers identified.
- The Facility will be Combined Heat and Power (CHP) when the identified heat loads are economically and technically feasible to connect. This means that the Facility will be able to export heat in the future with minimum modification. This will be achieved by virtue of having steam capacity designed into the turbine bleed and safeguarded space in the turbine hall to house CHP equipment.

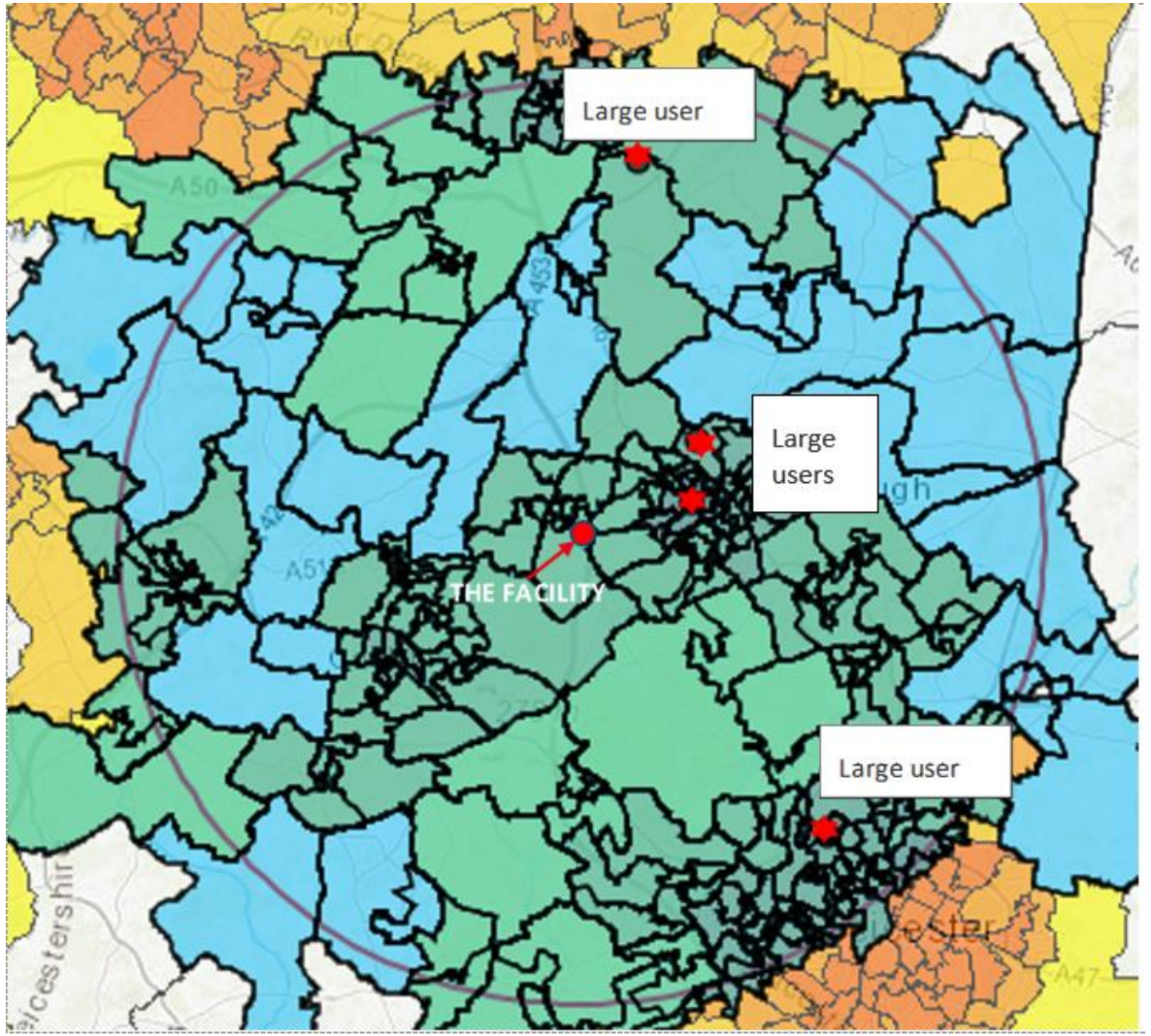
Details of Heat Supply



- The Turbine at Newhurst has a series of extractions at different pressures.
- High pressure steam could be extracted from the turbine and piped directly to the heat users – this would reduce net electricity output for Newhurst.
- Low pressure steam exiting the turbine could pass through an onsite heat exchanger to heat up the water for use in a heat network.
- Buried pre-insulated steel pipes could be used to distribute heat to the consumers for large distances without significant losses.
- The heat delivered to consumer premises is supplied to any boiler where the temperature is boosted to satisfy heating needs for the building.
- During plant non-operational periods, a back-up source of heat to meet consumers requirements would need to be proposed (for example, using oil/gas fired boilers or installing thermal stores to store excess generated heat)

Potential Heat Consumers

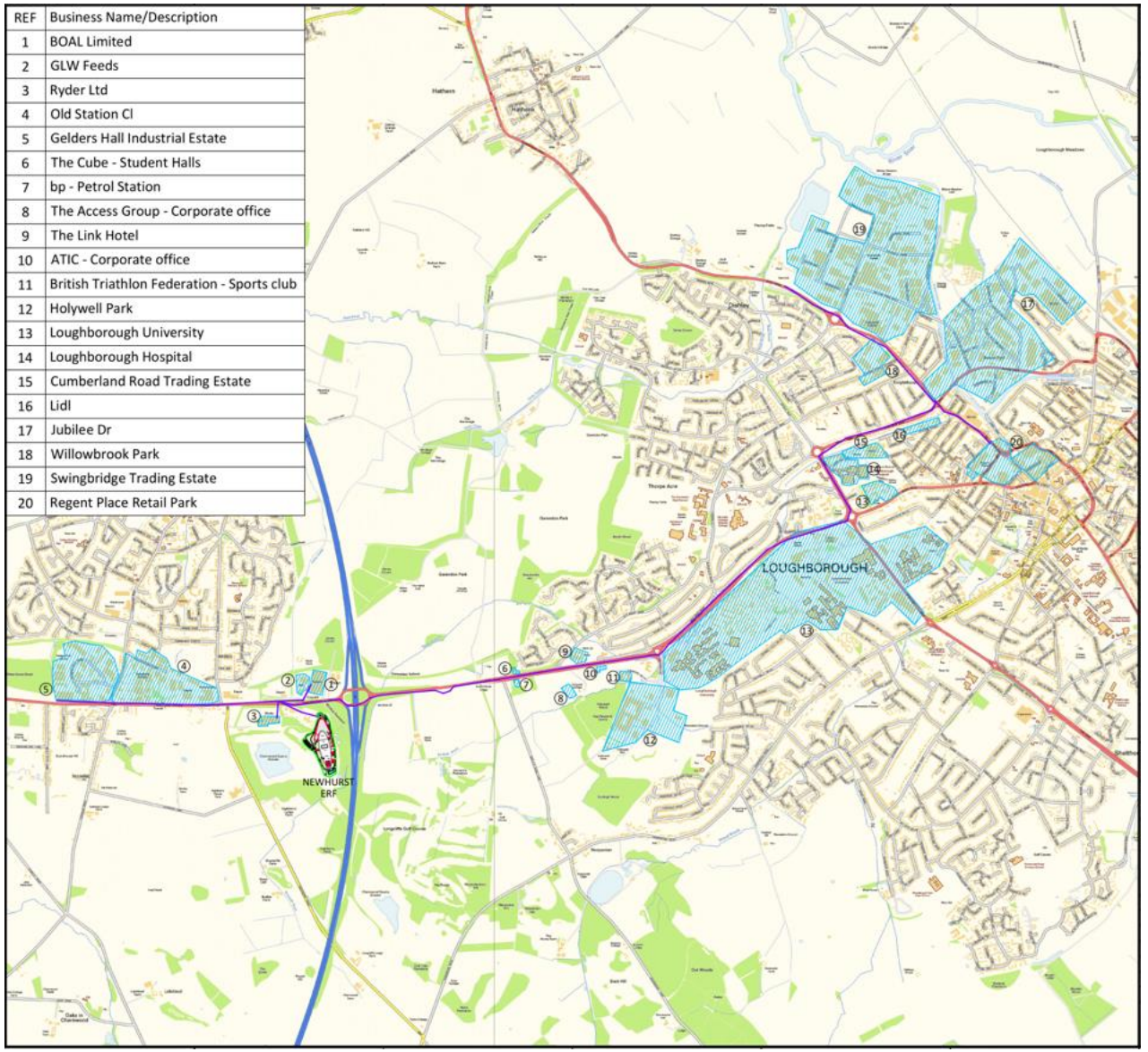
- The heat demand in the area surrounding the Facility is predominantly from the domestic and commercial/industrial sectors, and to a lesser extent, the education sector.
- In most cases, existing domestic buildings are unsuitable for inclusion in a heat network as a result of the prohibitive costs of replacing existing heating infrastructure and connecting multiple smaller heat consumers to a network.



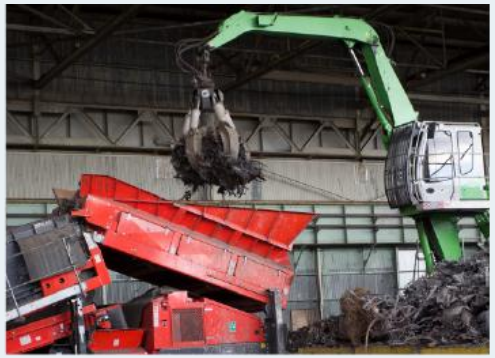
Source: UK CHP Development Map

Potential Heat Consumers

- The identification for potential heat demand was centered on nearby industrial and commercial users within a 9.2km radius.
- Physical constraints imposed by local infrastructure such as bridge crossing, railway line & rivers have a significant impact on which consumers can viably be connected. Some of these constraints require traffic management and permission from the highway authority which could be time consuming and costly.
- The 2 large heat users – Loughborough University and Swingbridge Trading estate – are being considered as potential heat users.



Thank You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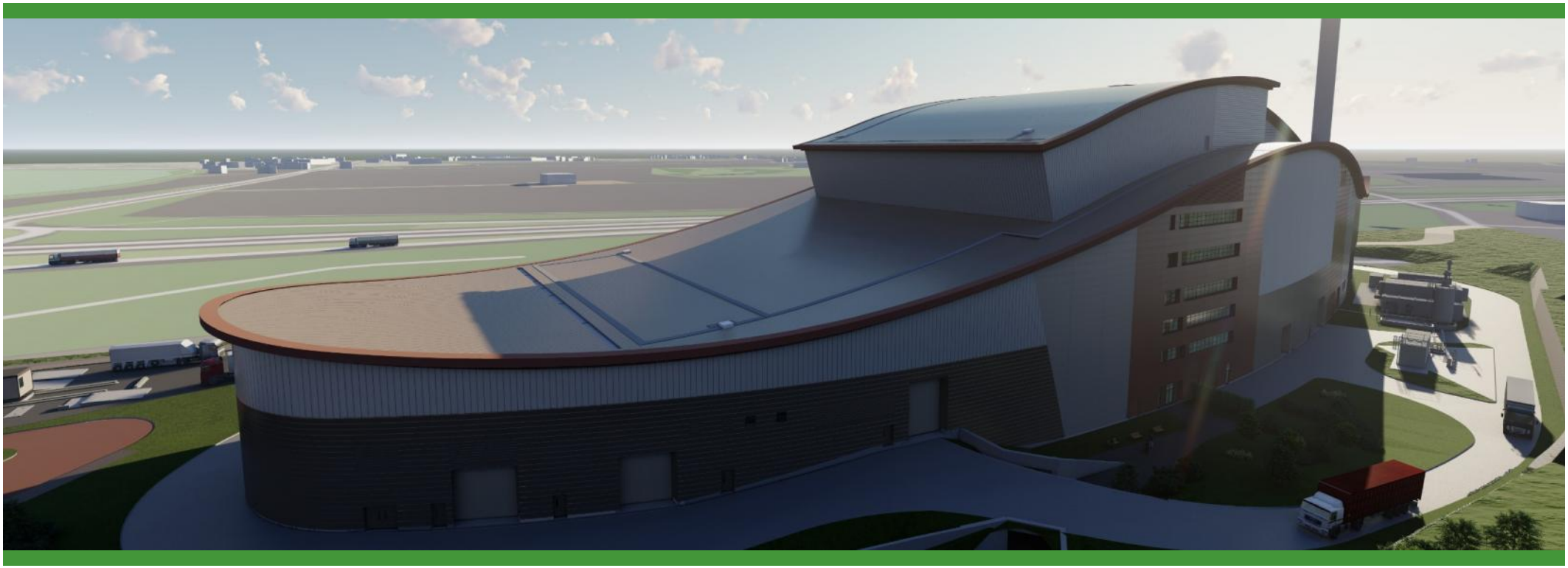

Newhurst ERF
Local Liaison Committee
Project Update
July 2022

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Newhurst Energy Recovery Facility

	Newhurst
Location	Shepshed, Leicestershire
Capacity (gross)	350 ktpy; ~42 MW
Financial Close	February 11, 2020
Engineer, Procure, Construct (EPC)	Hitachi Zosen INOVA (HZI)
Operator	Covanta
Scheduled Completion Date	Q2 2023

Construction (87% complete) progressing on time

Overall, the project is 90% complete

132kV Grid connection energised early June

30% of systems are mechanically and electrically complete and handed over to commissioning team ready for energisation

Operations & Maintenance Team have commenced their training

Around 400 operatives currently working on site. Achieved 1 million project hours since last LTI.

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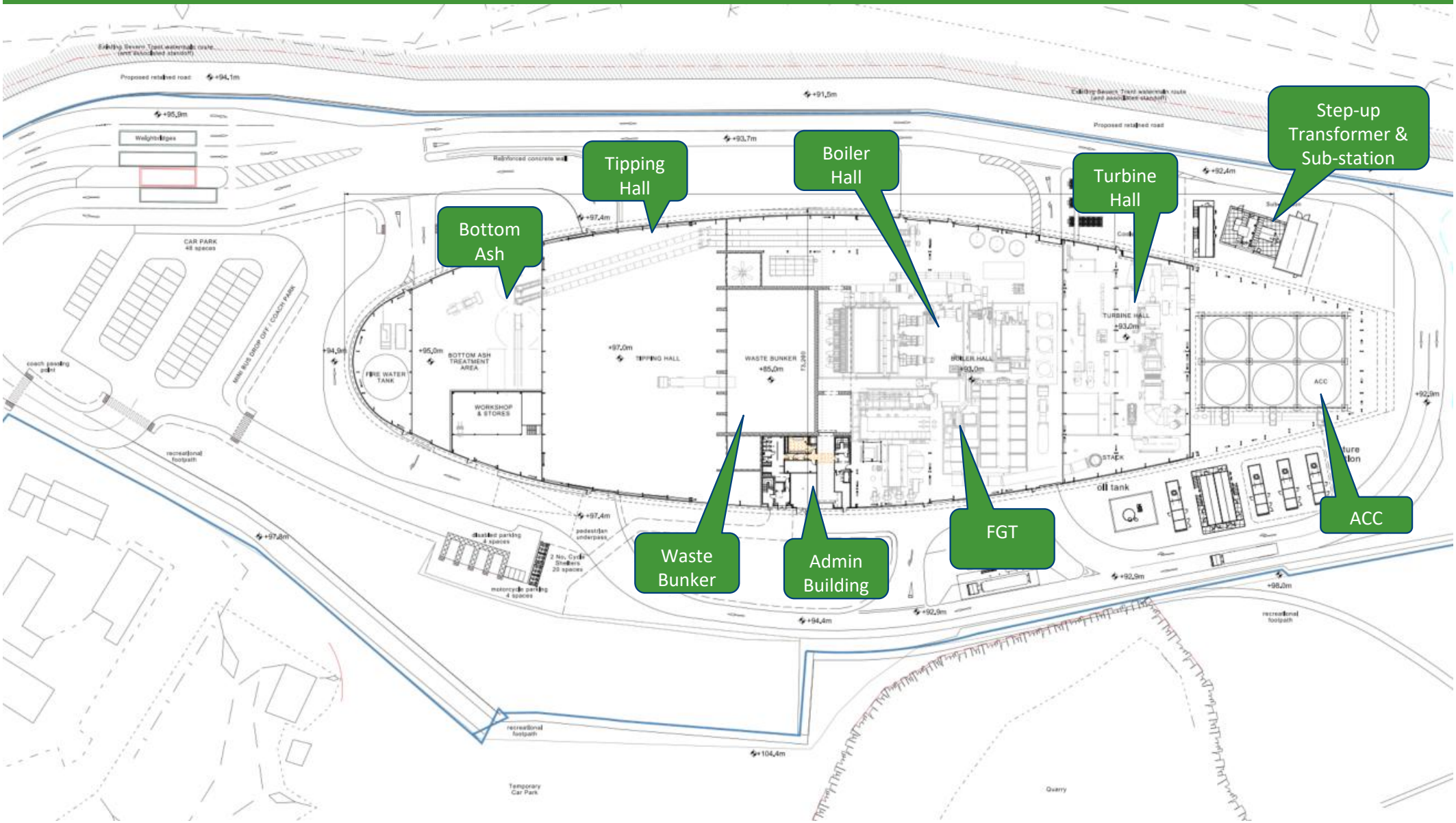
General Arrangement



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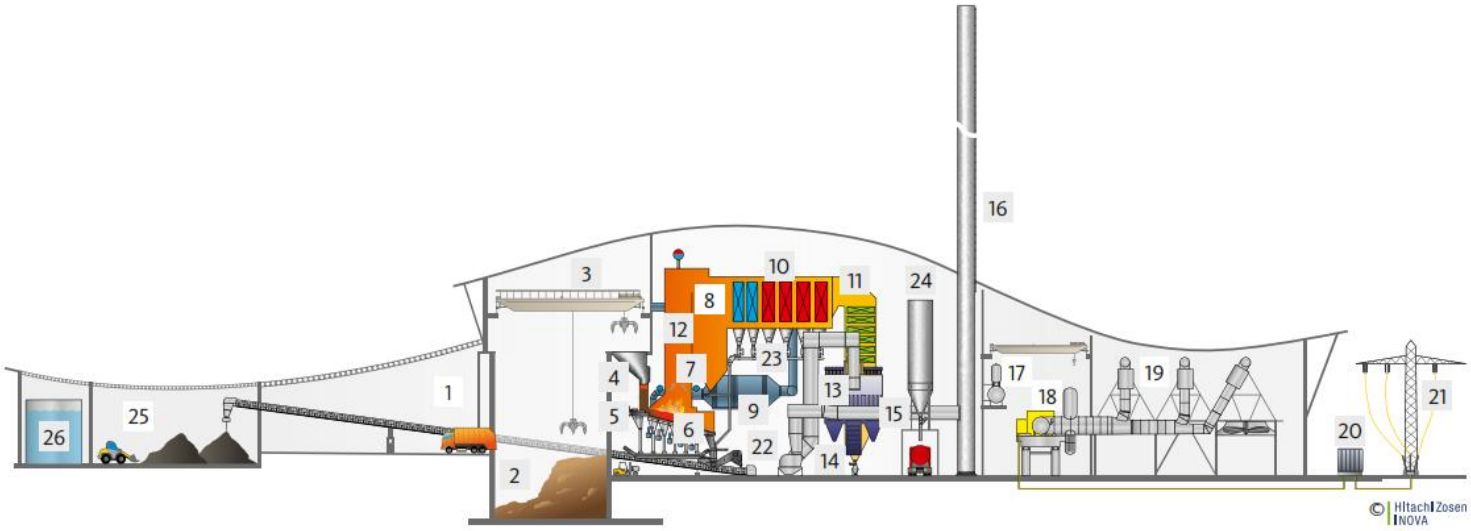
How does it work?



Waste Delivery and Storage	Combustion and Boiler	Flue Gas Treatment	Energy Recovery	Residue Handling and Treatment
1 Delivery hall	4 Feed hopper	12 SNCR DyNOR®	17 Feed water tank	22 Bottom ash extractor
2 Waste bunker	5 Ram feeder	13 Fabric filter	18 Steam turbine	23 Boiler ash discharge
3 Waste crane	6 HZI Grate	14 Induced draught fan	19 Air cooled condenser	24 Residue silos
	7 Secondary air	15 Flue gas duct	20 Transformer	25 Bottom ash area
	8 Four-pass boiler	16 Stack	21 Electrical power distribution	26 Fire water tank
	9 Primary air			
	10 Superheater			
	11 Economiser			

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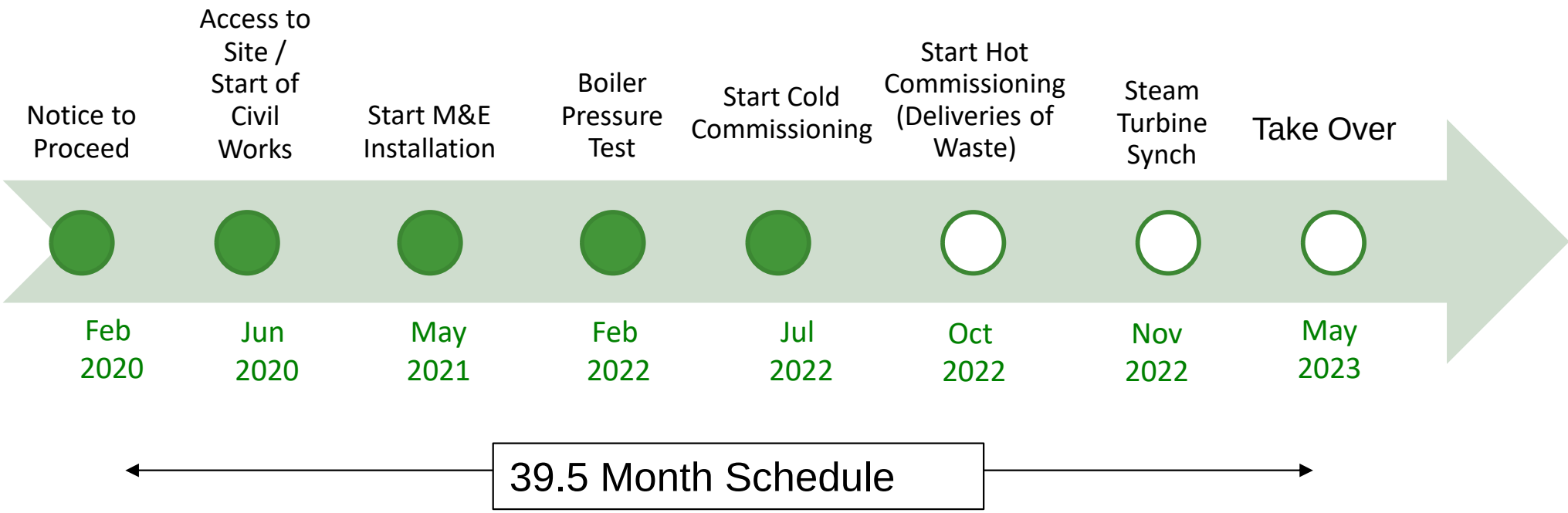
Project Timeline



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April 2022

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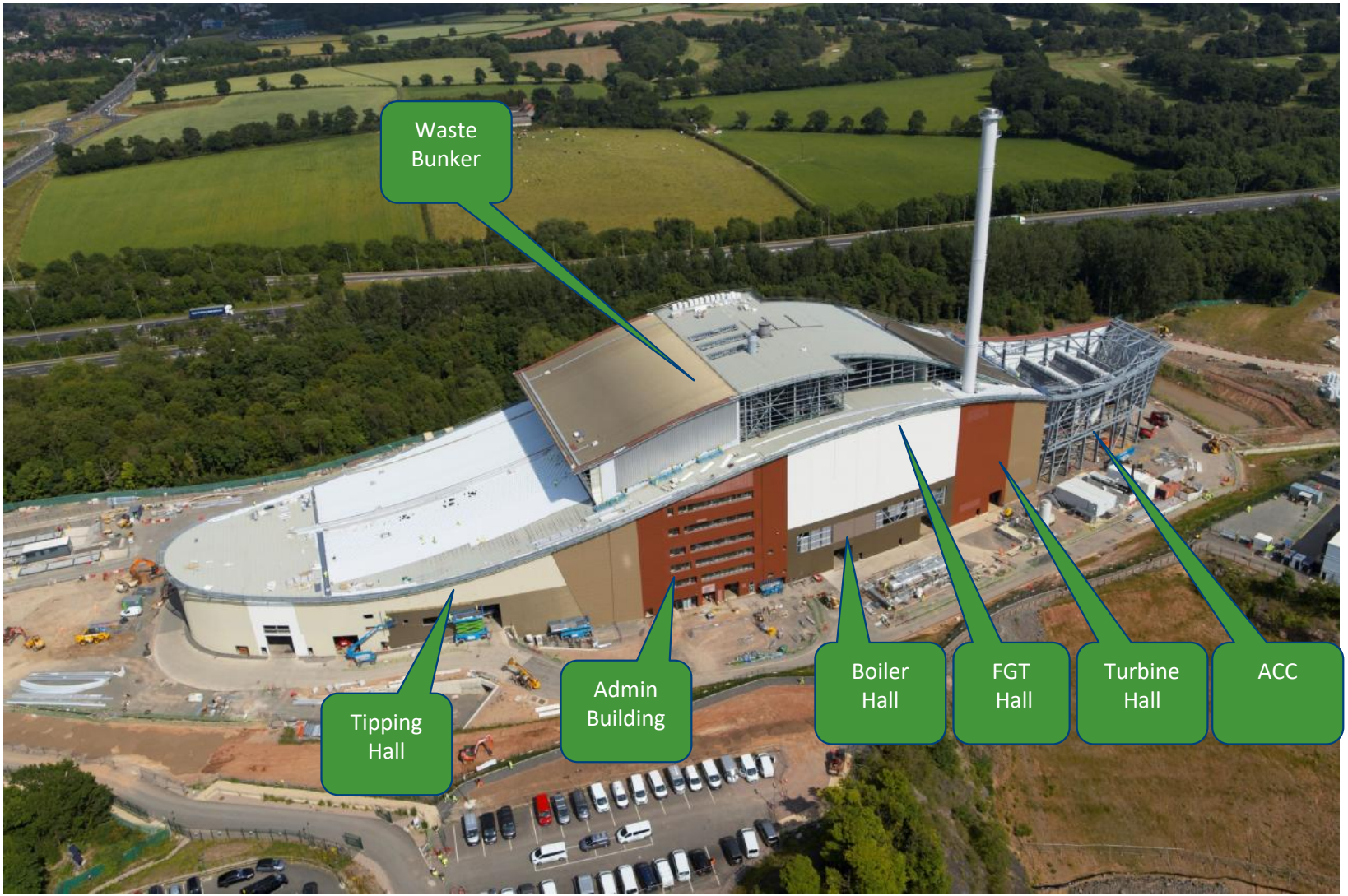
July 2022



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Progress Photos – July 2022

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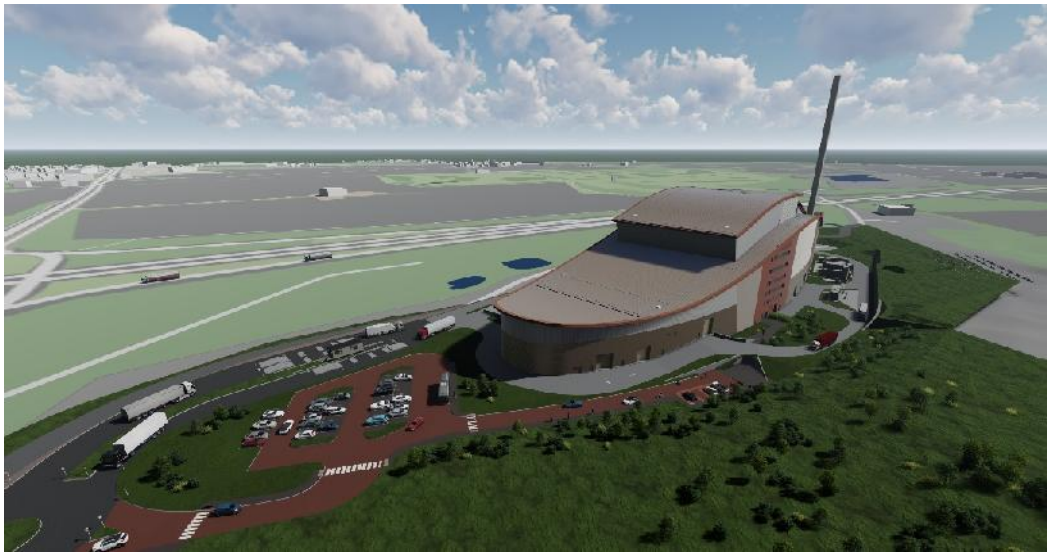
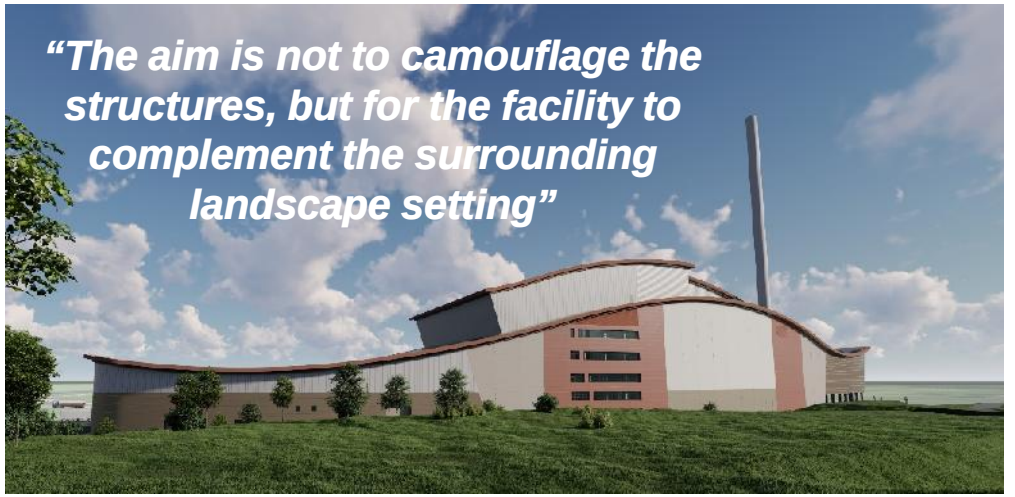
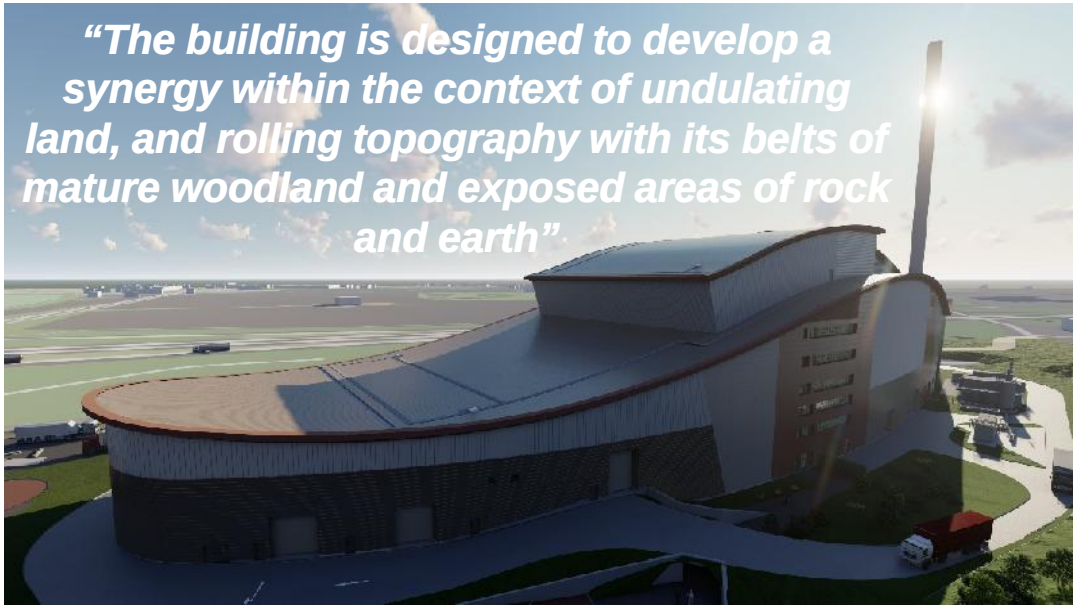
What will it look like when it is built?







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Planned vs Reality

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Planned vs Reality

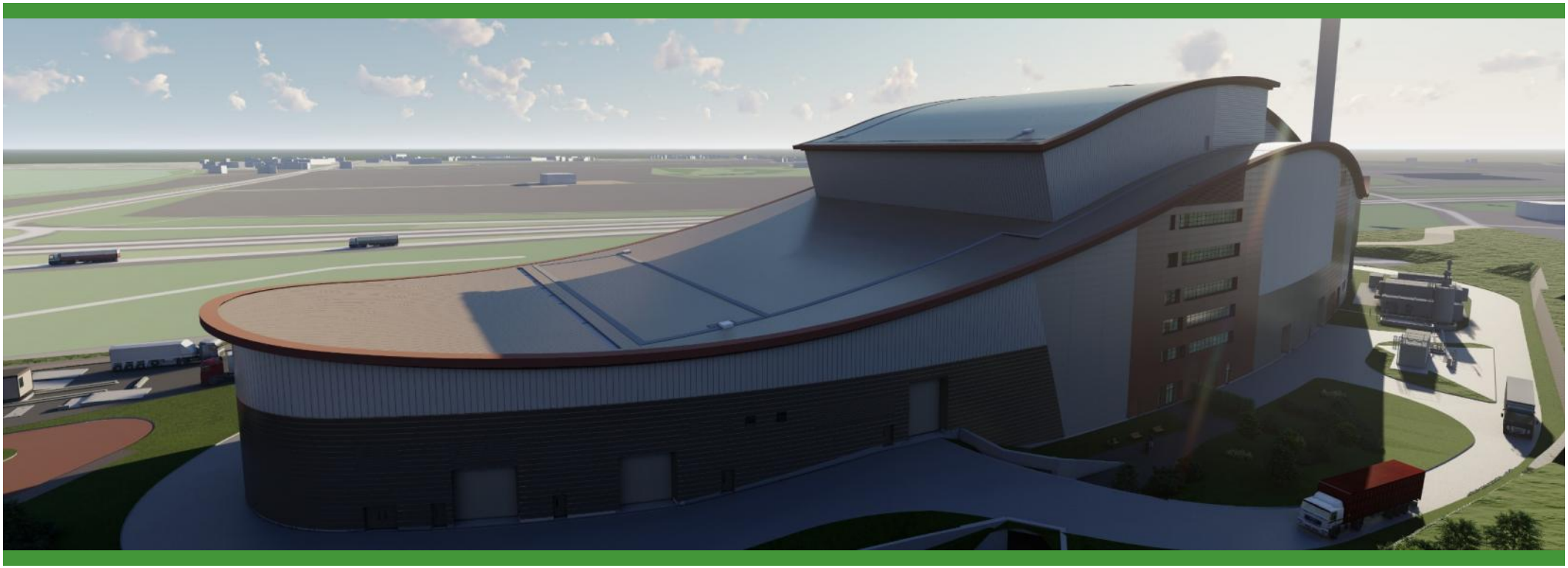
Construction Progress over last 3 months

- Erection of the Building Envelope continued including steelwork and cladding.
- M&E Contractors completed installation of the Combustion equipment, Flue Gas Treatment and Water Steam Cycle equipment.
- Electrical and Piping subcontractors continued with installation.
- Installation of the Turbine Generator continued.
- Energisation of the 132kV grid connection.
- Commissioning Team have mobilised on site.
- Operations & Maintenance Team have commenced their training.

3 Month Lookahead

- Cladding of the Building Envelope will continue.
- Electrical and Piping subcontractors will complete installation.
- Installation of the Turbine Generator will be completed.
- Landscaping continues.
- Cold commissioning activities will commence.
- Steam Blowing activities planned for September.

- ***Any questions?***



Newhurst ERF
Local Liaison Committee
Permitting Update
July 2022

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Environmental Permit Pre-Commissioning Conditions

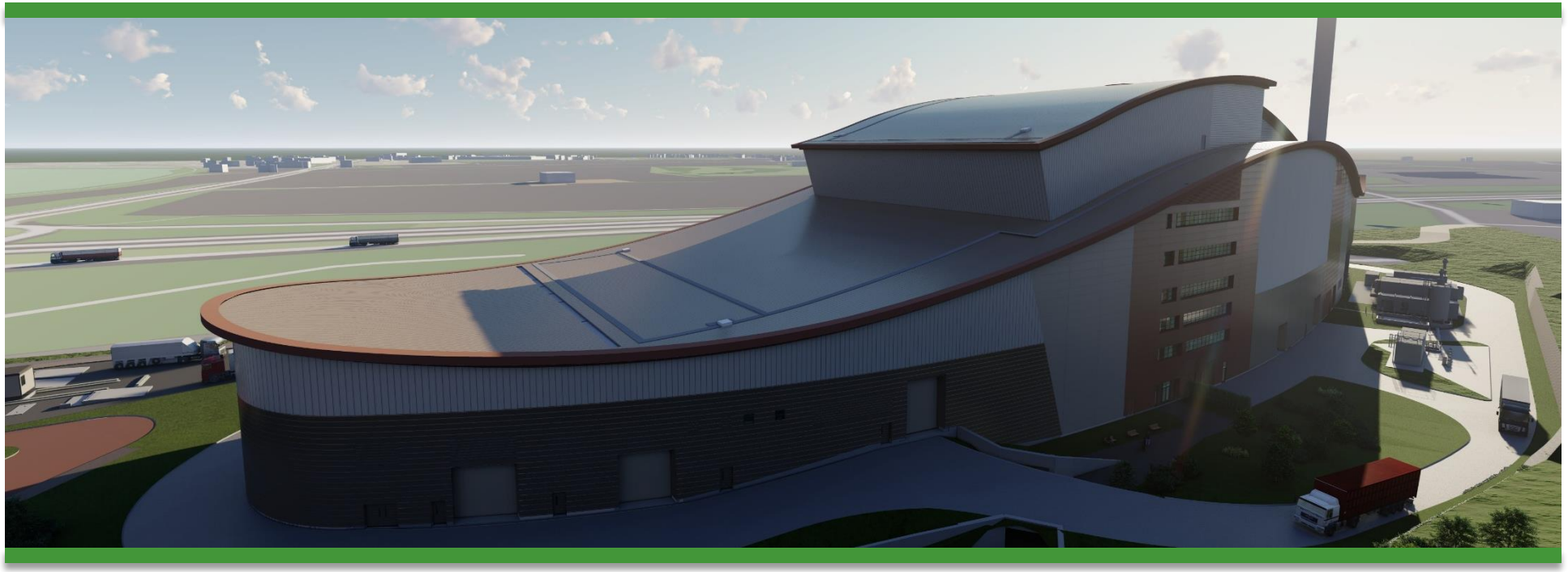
Condition	Summary of pre-operational condition	Status / Responsibility
PO1	Prior to commencement of commissioning, submit Environment Management System for approval by EA.	CEL has issued report to EA in April 2022. Pending approval.
PO2	Prior to commencement of commissioning, submit report describing options for heat utilisation including CHP and district heating.	CEL has issued report in May 2022.
PO3	Prior to commencement of commissioning, submit protocol for sampling of incinerator bottom ash for approval by EA.	CEL has issued report to EA in April 2022. Pending approval.
PO4	At least 4 months prior to the commencement of commissioning submit commissioning plan for approval by EA.	CEL has issued report to EA in May 2022. Pending approval.
PO5	No later than one month after completion of the final design submit Computational Fluid Dynamics (CFD) report to EA demonstrating achievement of 850°C for 2 seconds in the combustion chamber/ furnace.	Approved by EA. Closed

Environmental Permit Pre-Commissioning Conditions

PO6	At least 3 months before the commencement of commissioning for EA approval a methodology to demonstrate 850° / 2s residence time in furnace.	CEL requested extension of time to prepare this methodology. Expected to submitted in July.
PO7	Submit to the EA for approval, confirmation of which option will be implemented, including details of the incinerator technology configuration and a review of the air dispersion modelling.	Approved by EA. Closed.
PO8	Prior to the commencement of commissioning submit a written report to the EA for approval, commissioning plan and monitoring procedure for the odour abatement system.	Currently under review by CEL. Submission to EA – expected August 2022.
PO9	During commissioning, carry out tests to demonstrate whether the furnace combustion air will provide the required air flows to ensure that negative pressure is achieved throughout the reception hall. Demonstrate whether air is pulled through the reception hall and bunker area into the furnace and activated carbon filter odour abatement system with dead spots minimised.	EPC Contractor to carry out tests during commissioning and prepare report. Expected December 2022.
PO10	At least 3 months prior to the commencement of commissioning, submit updated Fire Prevention Plan (FPP) to EA for approval.	CEL has issued report to EA in April 2022. Pending approval.

Environmental Permit Pre-Commissioning Conditions

PO11	Prior to the commencement of commissioning, submit to the EA for approval an updated Noise Impact Assessment (NIA) to reflect the final, designed plant.	CEL has issued report to EA in June 2022. Pending approval.
PO12	Prior to the commencement of commissioning, submit to the EA for approval the waste acceptance procedure to be used at the site.	CEL has issued report to EA in April 2022. Pending approval.
PO13	Prior to the commencement of commissioning, submit to EA for approval a protocol for monitoring soil and groundwater.	CEL has issued report to EA in June 2022. Pending approval.



Newhurst ERF
Local Liaison Committee
Permitting Update
July 2022

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Environmental Permit Pre-Commissioning Conditions

Condition	Summary of pre-operational condition	Status / Responsibility
PO1	Prior to commencement of commissioning, submit Environment Management System for approval by EA.	CEL has issued report to EA in April 2022. Pending approval.
PO2	Prior to commencement of commissioning, submit report describing options for heat utilisation including CHP and district heating.	CEL has issued report in May 2022.
PO3	Prior to commencement of commissioning, submit protocol for sampling of incinerator bottom ash for approval by EA.	CEL has issued report to EA in April 2022. Pending approval.
PO4	At least 4 months prior to the commencement of commissioning submit commissioning plan for approval by EA.	CEL has issued report to EA in May 2022. Pending approval.
PO5	No later than one month after completion of the final design submit Computational Fluid Dynamics (CFD) report to EA demonstrating achievement of 850°C for 2 seconds in the combustion chamber/ furnace.	Approved by EA. Closed

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PO6	At least 3 months before the commencement of commissioning for EA approval a methodology to demonstrate 850° / 2s residence time in furnace.	CEL requested extension of time to prepare this methodology. Expected to submitted in July.
PO7	Submit to the EA for approval, confirmation of which option will be implemented, including details of the incinerator technology configuration and a review of the air dispersion modelling.	Approved by EA. Closed.
PO8	Prior to the commencement of commissioning submit a written report to the EA for approval, commissioning plan and monitoring procedure for the odour abatement system.	Currently under review by CEL. Submission to EA – expected August 2022.
PO9	During commissioning, carry out tests to demonstrate whether the furnace combustion air will provide the required air flows to ensure that negative pressure is achieved throughout the reception hall. Demonstrate whether air is pulled through the reception hall and bunker area into the furnace and activated carbon filter odour abatement system with dead spots minimised.	EPC Contractor to carry out tests during commissioning and prepare report. Expected December 2022.
PO10	At least 3 months prior to the commencement of commissioning, submit updated Fire Prevention Plan (FPP) to EA for approval.	CEL has issued report to EA in April 2022. Pending approval.

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PO11	Prior to the commencement of commissioning, submit to the EA for approval an updated Noise Impact Assessment (NIA) to reflect the final, designed plant.	CEL has issued report to EA in June 2022. Pending approval.
PO12	Prior to the commencement of commissioning, submit to the EA for approval the waste acceptance procedure to be used at the site.	CEL has issued report to EA in April 2022. Pending approval.
PO13	Prior to the commencement of commissioning, submit to EA for approval a protocol for monitoring soil and groundwater.	CEL has issued report to EA in June 2022. Pending approval.