

Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for Greencore Food To Go Ltd Northampton operated by Greencore Food to Go Limited.

The permit number is EPR/PP3730VH

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Structure of this document

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Key issues of the decision

Summary

The facility manufactures sandwiches, sandwich fillings, vegetable snacks and other similar products. All products are made and despatched daily. The factory assembles food and also cooks some items. A planned preventative maintenance schedule is in place.

There is a chilled production where food is either washed, cooked or defrosted. Dry goods are sieved and passed through an oven. Following preparation food is bagged and passed through a sanitiser tunnel which sprays sanitiser on a conveyer belt. Alternatively the products that require cooking are cooked in an oven. There is also a salad wash and a manual check on some items to ensure the products have not been damaged. After cooking the ingredients are passed through a blast chiller. The raw materials are then assembled using assembly lines. A depositor machine is used to deposit deli fillings into their containers. Flow wrap, bag sealing and skillet sealing machines are used to package the products. The products pass through a metal detector before being stacked into trays and despatched. The

production areas are cleaned continually and there is a deep clean period in each day.

There is an effluent treatment plant to treat waste water before discharge to a waste water treatment plant under a trade effluent consent. This effluent treatment plant is included in this permit as a scheduled S5.4 A1 (a) (ii) activity. The effluent treatment plant comprises of a balance tank, sludge collection tank, a tank for storing aluminium chloride and a Dissolved Air Flotation (DAF) tank. Effluent is screened to remove solids then deposited in a balance tank. The effluent is then pumped to a DAF tank where an aluminium chloride coagulant and a polymer flocculant is used to reduce the suspended solids, the fats oil and grease, sulphate and chemical oxygen demand before the effluent is discharged to the foul sewer. Effluent sludge is pumped from the DAF tank to the sludge tank where it is stored until it is removed for off site treatment.

There are 14 gas powered water heaters, ovens and boilers on the site that will emit combustion gases to air. These units have a combined thermal input capacity of 3.5MW. There are also three small gas boilers used for central heating office areas which included in the emission points to air table, but not in the activity table. The emissions from these boilers have not been assessed as they are used for a purpose similar to a domestic dwelling rather than industrial use.

Site condition report

The applicant provided a site condition report which contains information on the previous land use at the site and details of the geological setting of the site. The site is located above a secondary bedrock aquifer. The geology of the site is comprised of bedrock interbedded limestone and mudstone, mudstone and superficial diamicton till. The site has been used for mixed industrial uses since 1989. No groundwater or soil samples have been taken and no monitoring of the groundwater and soil is proposed over the lifetime of the permit. The operator has stated that they have assessed the risk from the activities and they deem that there is low risk of polluting groundwater, due to the materials used on site, the integrity of storage receptacles and the preventative maintenance that is conducted. We agree that as the site has adequate surfacing and pollution prevention measures we consider that there is a low risk of polluting soil and groundwater. They have stated that this risk assessment will be reviewed regularly and if there is a risk of polluting groundwater then monitoring will be undertaken. A condition has been included to require periodic monitoring of soil and groundwater to be undertaken unless the operator demonstrates that this is not necessary based on a systematic assessment of the risk, which means that this risk assessment will be revisited at least every five years, if not more frequently.

Risk to Surface Water

Drainage

There are oil interceptors in place to prevent oil petrol and diesel spillages from leaving the site and entering the surface water drainage system. The application states that a Closed Circuit Television (CCTV) survey of the

drainage system is planned to be undertaken in 2015 to check the integrity of the drains.

Site interceptor and gully pots will provided containment for firewater runoff before being pumped out.

There are spill kits on site to prevent spillages reaching the drains. The site is manned 24 hours a day seven days a week. The application details that security personnel are spill kit trained so that there will always be a trained person on site in the event of a spill outside of normal working hours.

Chemical and Diesel storage

Chemical and diesel storage tanks have containment which is inspected daily. There are six 3000 litre chemical storage tanks on site. Three are located by Unit A and are used to store hygiene chemicals. The tanks by Unit A are made of high density polyethylene and include a bund. The other three 3000l tanks are constructed of stainless steel and include a bund, they are located between Unit B and Unit C. There are level monitors in place on the self bunded chemical storage tanks which are monitored by delivery personnel. The external chemical storage tanks have a bund which has a capacity of 110% of the stored volume. The operator has stated that the external chemical storage tanks do not fully meet the requirements of our guidance document 'How to comply with your environmental permit' as the filling connections and pipework are outside of the permitted area. They also do not have high level alarms in place. The operator is required to undertake an assessment of the site containment measures through an improvement condition specified in the permit.

A 2500l plastic self bunded tank is used to store diesel. The filling connection is located within the bund. The bund capacity is 110% of the stored volume and the operator has confirmed that the tank meets the requirements of our guidance document 'How to comply with your environmental permit'. The diesel tank is protected by barriers to prevent accidental damage from a fork lift truck collision. The diesel tank is designed to prevent overfilling as the pump shuts off when the tank is full.

The diesel and chemical storage tanks are located near to surface water drains. A drain cover is put in place before delivery begins so the pathway to the surface water drains is removed. We do not consider that covering drains is an appropriate long term management technique for preventing chemicals entering the surface water drains. The loading area should be appropriately contained as per our guidance or the area where any spills during loading would drain to should drain to the effluent treatment plant or an appropriate vessel, not surface water drains.

The operator has highlighted the following factors which minimise the risk of the chemicals entering the surface water drain:

- Deliveries leave 500litres of headroom at the top of the tank.
- The tanks are made of appropriate materials that are unlikely to corrode

- The tanks are inspected daily.
- Access near the tanks is minimised and vehicles are marshalled on site.
- Levels are monitored regularly.

Based on the information in the application and requests for information we are satisfied that the operator is taking steps to try to prevent diesel and chemicals reaching the surface water drains. However we have included an improvement condition in the permit to require the operator to assess the containment against our guidance and assess the risk of chemical and diesel entering the surface water drains and to submit a timescale for improvements as necessary. See section on the improvement condition for more details.

Also on site are four metal bunded cabinets used to store small volumes of chemicals.

Effluent

The applicant has identified in their risk assessment that is the effluent pump chambers B and C failed, effluent could flood the yard and potentially enter the surface water drains. As there are two pumps (one active and one pump on standby) so if one malfunctioned the other takes over automatically meaning this risk is reduced. The risk is also minimised by the fact that planned preventative maintenance will be undertaken. If the pump failed an emergency drainage contractor would be called to remove the effluent to a tanker while engineers access the chamber. The operator has estimated that the alarm would be identified within two hours of it activating, and that the pumps should give at least two hours warning before flooding the yard. Visual alarms are in place currently but the operator plans to fit audible alarms in 2015 which will allow the alarm to be detected earlier.

Considering the risk of both pumps failing is low, and that audible alarms are due to be installed, we are satisfied that the operator is taking appropriate steps to stop the effluent reaching the surface water drains if pumps in chamber B and C were to fail.

The aluminium chloride, balance, sludge and DAF tanks in the effluent treatment plant are all fitted with high level visible and audible alarms to prevent overfilling. The aluminium chloride tank is self bunded. If the balance tank level is too high there is an overflow pipe that discharges the effluent to the foul sewer drain. A drain cover is used to protect the nearest surface water drain during delivery of aluminium chloride and during sludge collection. The sludge tank pump shuts off automatically if the level gets too high. The effluent pump to the DAF tank shuts off if the level gets too high. If the DAF pump or sludge skimmer trips a visible alarm is activated in the engineering workshop. All of the pump chambers have high level visible alarms in place to prevent overfilling. The operator is taking measures to prevent accidents occurring which might lead to the tanks in the effluent treatment plant leaking or rupturing. These measures include:

- Using concrete bollards to prevent vehicle collision
- Daily tank inspections

- Training of fork lift truck drivers and use of vehicle marshals
- Locking the tank valves and two redundant valves in the sludge tanks have had their levers removed
- Using end caps in the sludge tank to prevent leaks
- Capping the balance tank drain valve with a blank flange.

Based on these proposals we are satisfied that the operator is taking appropriate steps to try to prevent a catastrophic tank failure or leak from the tanks in the effluent treatment plant.

In the event of a spill from a tank in the effluent treatment plant the operator has detailed that spill kits would be used to direct the spill to the drain to the water treatment works, and the site would let Anglian Water know about the spills so that they can take appropriate measures at the waste water treatment works. The operator has stated that it takes an estimated 8 to 12 hours for effluent from this site to reach the treatment works. Tankers can be used to remove any spillages contained in bund, gully pots and oil separators. These steps would minimise the environmental impact of a catastrophic spill, as the waste water treatment works will have warning so that they can take appropriate steps, and this will prevent untreated effluent reaching surface waters.

Improvement Condition

An improvement condition (IC1) has been included to require the operator to assess the containment associated with the external chemical storage tanks and above ground and subsurface structures in the effluent treatment plant against our guidance. The condition also requires the operator to assess how the chemicals and effluent stored on site will be prevented from entering the surface water drainage system and provide a timescale for any improvement. This has been requested as the containment and drainage detailed in the application does not meet the requirements of our guidance. The operator has provided details of the measures in place to prevent the contents of the tanks reaching the surface water drains, as detailed above, and on this basis we are satisfied that the permit can be issued as the risk to surface water is being minimised. However we have included the improvement condition as we wish the operator to consider improvements to the site infrastructure to remove the pathway for any impact.

Conclusion

Not all of the tanks on site have the correct containment when compared to our guidance. The operator is taking steps to minimise the risk of effluent and chemicals reaching the surface water drains in the event of an accident, and to minimise the risk of an accident occurring. We are satisfied that the operator is controlling the risk to the environment by these operating techniques, but we have included an improvement condition to require them to use our guidance to assess the risk to the surface water drains and consider infrastructure improvements that would remove the pathway for pollution completely.

Best Available Techniques (BAT) Assessment

Table 1 compares indicative BAT taken from Food and Drink Sector Guidance Note Environmental Permitting Regulations (EPR) 6.10, and the measures proposed in the supporting information of the application.

Table 1 Comparison of Indicative BAT with key measures proposed by the operator	
<i>Indicative BAT</i>	<i>Key measures proposed</i>
<p>Accident management</p> <ul style="list-style-type: none"> • <i>Use techniques and procedures to prevent overfilling of tanks - liquid or powder- (eg. level measurement displayed both locally and at the central control point, independent high-level alarms, high-level cut-off, and batch metering).</i> • <i>Identify the major risks associated with the effluent treatment plant (ETP) and have procedures in place to minimise them.</i> • <i>Provide adequate effluent buffer storage so that you can stop spills reaching the ETP or controlled water, especially those spills with high organic strength.</i> • <i>Protect against spillages and leaks of refrigerants, especially ammonia.</i> 	<p>The tanks in the effluent treatment plant are equipped with sensors and pumps automatically shut off when the level gets too high. There is level measurement in place on all above ground storage tanks</p> <p>The environmental risk assessment provides details on risks associated with the ETP.</p> <p>The operator has identified that in the event of a high organic strength spill the balance tank will be used to contain and dilute the effluent before it is treated.</p> <p>The chilled rooms contain temperature sensors that trigger alarms if the temperature rises.</p>
<p>Energy Efficiency</p> <p><i>Ensure efficient operation of the refrigeration system – consider heat recovery from refrigeration system, reducing heat load, efficient operation on part load and fast closing doors/alarms on chilled storage areas.</i></p>	<p>The refrigeration system is maintained by a specialist contractor. Rapid closing doors are used on a short timer that close automatically.</p>
<p>Efficient use of raw materials</p> <p><i>Identify and evaluate opportunities for the recycling or reuse of water, taking into consideration hygiene issues and practical constraints. An optimal scheme is likely to include a combination of:</i></p> <ul style="list-style-type: none"> • <i>sequential reuse (water stream used for two or more processes or operations before disposal)</i> • <i>the recycling of condensate as boiler feed water (where it is of</i> 	<p>Water is used for multiple purposes before disposal. For example, the traywash cleaning uses water from the second stage of cleaning to feed the first stage.</p> <p>The condensate is recovered and used as boiler feed water.</p>

<p><i>suitable quality). Contaminated condensate should be used for lower grade cleaning activities e.g. yard washing</i></p> <p><i>Assess the potential environmental impact of raw materials and make substitutions where appropriate. Consider their degradation products when choosing cleaning materials. If caustic is used low mercury sodium hydroxide should be selected.</i></p>	<p>The BAT assessment details that the environmental risk of raw materials is considered in their selection. The caustic used contains low or no levels of mercury.</p>
<p><i>Cleaning and sanitation</i></p> <p><i>Manual cleaning:</i></p> <ul style="list-style-type: none"> <i>procedures should ensure that hoses are only used after dry clean-up</i> <i>trigger controls should be used on hand-held hoses and water lances to minimise the use of washdown water</i> 	<p>Food waste on the factory floor is moved by sweeping rather than hosing.</p> <p>Water reducing nozzles are in place on water guns.</p>
<p><i>Point source emissions to water</i></p> <p><i>Keep raw materials and product out of the wastewater system wherever possible. The following techniques should be used:</i></p> <ul style="list-style-type: none"> <i>dry clean-up</i> <i>installation of drain catchpots and screens</i> <i>use a balancing tank or pond (equalisation or balancing), with a hydraulic retention time of 6 – 12 hours.</i> 	<p>See cleaning section for details of dry cleaning.</p> <p>Catchpots are in place at drains in the processing area. There is a screen in the ETP.</p> <p>The operator was asked to provide the daily treatment capacity of the effluent treatment plant, and they responded that the DAF plant can treat up to 840m³ per day, but current pump capacity is 720m³ per day. However, the plant cannot treat 720m³ per day as their trade effluent consent only allows a discharge of 600m³ a day. The balance tank used has a hydraulic retention time of 5.2 hours, based on the 600 m³ that can be discharged. However, they have provided the levels discharged daily since January, and the level has only once exceeded 500m³. Based on the more typical figure of 500m³ per day, the balance tank retention time is 6.2 hours, so we consider the balance tank to be appropriately sized.</p>
<p><i>Fugitive emissions</i></p> <ul style="list-style-type: none"> <i>Regularly inspect pipe joints, shaft seals and gaskets in the</i> 	<p>The operator has provided a schedule of how frequently leak detection is</p>

<p><i>refrigeration plant using proprietary leak detection equipment.</i></p> <ul style="list-style-type: none"> • <i>Ensure that a system log book is kept which records:</i> <ul style="list-style-type: none"> ○ <i>quantity of refrigerant and oil added to or removed from the system(s)</i> ○ <i>leakage testing results</i> ○ <i>location and details of specific leakage incidents.</i> 	<p>undertaken.</p> <p>The BAT assessment states that this is undertaken.</p>
<p>Odour</p> <ul style="list-style-type: none"> • <i>Ensure that effluent treatment plant is adequately sized and maintained, and check that site waste water drains do not become blocked.</i> • <i>Design and operate abatement plant to cope with maximum loadings and volumes.</i> • <i>Design extraction from odorous activities to minimise air flows to the abatement plant.</i> 	<p>See section on odour for further details.</p> <p>The BAT assessment states that the effluent treatment plant is adequately sized and subject to maintenance. Preventative maintenance is conducted to prevent blockage of drains.</p> <p>The BAT assessment states that these two steps have been undertaken.</p>

The site will use Dissolved Air Flotation (DAF) in the effluent treatment plant. EPR6.10 indicates that this is an appropriate treatment method.

Emissions to Air

We consider that the emissions from boilers and ovens of this size and combustion source are unlikely to have a negative impact on air quality.

Refrigerant

The operator has stated that leak detection will be undertaken regularly (dependent on the amount of refrigerant being stored on site). They have stated that losses are only likely to occur during plant failure. The operator is reducing the risk of refrigerant loss by conducting regular plant inspections and planned preventative maintenance.

We do not consider that the emissions to air from this site are likely to have a significant negative effect on the environment and we have not required them to undertake monitoring of emissions to air.

Odour

According to our guidance document 'How to Comply with your Environmental Permit' odour is likely to be a key issue for the food and drink sector. There is human occupation less than 10m from the boundary as the site is located

within an industrial estate. The nearest residential receptor is located approximately 200m away.

The operator submitted an odour management plan (reference 'Odour Management Plan GCN-OMP) with this application. This has been assessed using Environment Agency Guidance H4 Odour Management – How to Comply with your Environmental Permit. The plan was compared against this document to ensure that the key sources of odour were identified and adequate prevention and control measures are being proposed.

The odour management plan has identified the potential source materials of odour. The key measures identified in the odour management plan for preventing and minimising odour releases are:

- Ensuring waste tankers that collect sludge have not previously been used to transport malodorous wastes.
- Ensuring food waste is collected frequently
- Use of trained suppliers to minimise the risk of diesel spillages during delivery
- Using Ultra Violet (UV) abatement equipment to treat the emissions from the giusti kettle.

Other measures proposed include:

- Cooking chutneys and other products that may cause odours late at night or in the early hours of the morning.
- Routine monitoring of site perimeter for odour.

The application highlighted that the only odour issues experienced at the site relate to cooking chutneys in the giusti kettle (see annex 2 for more details). This emission point uses UV abatement. This works by using UV light to oxidise odours. The BAT assessment highlighted that the abatement equipment is designed to cope with maximum loadings and volumes and airflow to the abatement plant is minimised.

Malodour would be identified by staff performing walks of the site perimeter, or by staff arriving for their shifts. The odour management plan states that in the event of malodour being generated, the activity responsible would be ceased and analysis would be undertaken to look at the cause. The operator would then look to develop a control mechanism to become operational without generating malodour. The odour management plan also identifies a range of incidents that may arise which could generate malodour, and proposes methods minimise the effects if they do occur.

Based on their odour management plan and supporting documents submitted with the application we are satisfied that odour releases will be minimised by a mixture of operating techniques and abatement technologies. This odour management plan and it has been incorporated into the permit as an operating technique.

Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

Aspect considered	Justification / Detail	Criteria met
		Yes
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with Regulatory Guidance Note (RGN) 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation and web publicising	The web publicising and consultation responses (Annex 2) were taken into account in the decision. The decision was taken in accordance with our guidance.	✓
Operator		
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.	✓
Site condition report	The operator has provided a description of the condition of the site. We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED–	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>guidance and templates (H5).</p> <p>We consider the land unlikely to have historic contamination based on it's previous use.</p> <p>See key issues for further information.</p>	
Biodiversity, Heritage, Landscape and Nature Conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat .</p> <p>The site is within the relevant screening criteria of Upper Nene Valley Special Protection Area and Ramsar site, three local nature reserves and six local wildlife sites.</p> <p>A full assessment of the application and its potential to affect the sites has been carried out as part of the permitting process. We consider that the application will not affect the features of the sites.</p> <p>Due to the distance from the designated sites to the facility, the only possible pathway for impact would be via emissions to air. The only potential emissions would be those from the boiler and some fugitive emissions from the refrigeration unit. As discussed in the Emissions to Air section of the key issues, these emissions will be controlled by preventative maintenance and compliance with the F Gas regulations.</p> <p>The thermal input capacity of the boilers is below 20MW so the installation is not considered 'relevant' for assessment under the Agency's procedures which cover the Conservation (Natural Habitats &c.) Regulations 1994 (Habitats Regulations). This was determined by referring to the Agency's guidance 'AQTAG014: Guidance on identifying 'relevance' for assessment under the Habitats Regulations for installations with combustion processes.' There are no other emissions to air (apart those discussed above) from the installation, thus no detailed assessment of the effect of the releases from the installation on SACs, SPAs and Ramsar sites is required.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance.</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Environmental Risk Assessment and operating techniques		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator undertook a screening of the impact of emissions using the H1 tool. However, this has not been assessed as the only point source emissions to air are from the boilers and ovens, and some water vapour. As discussed in the key issues section above, we do not consider that boilers and ovens of this size are likely to have a negative impact on air quality. A qualitative risk assessment has also been undertaken.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment all emissions will be minimal.</p>	✓
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. See key issues section for more details.</p> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Food and Drink Sector Guidance Note EPR 6.10 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant Best Available Techniques Reference Documents (BREFs).</p>	✓
The permit conditions		
Improvement conditions	<p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none">➤ appropriate infrastructure and procedures are in place to ensure that that accidents that may cause pollution are minimised. <p>See risk to surface water section for more details.</p>	✓
Incorporating the application	<p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	<p>determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p> <p>The odour management plan has been incorporated as this details how the operator will control odour emissions. Other sections of the application have been included as these detail how the operator will run the facility in a way that minimises the risk of pollution arising.</p>	
Reporting	<p>We have specified reporting in the permit.</p> <p>We have asked the operator to report on the water, energy and raw material usage, throughput of the facility annually.</p> <p>We made these decisions in accordance with our guidance document 'How to comply with your environmental permit'.</p>	✓
Operator Competence		
Environment management system	There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓
Relevant convictions	<p>The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found.</p> <p>The operator satisfies the criteria in RGN 5 on Operator Competence.</p>	✓
Financial provision	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.	✓

Annex 2: Consultation and web publicising responses

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

Response received from
Northampton Borough Council – Environmental Health (response received 03/11/14 and 04/11/14)
Brief summary of issues raised
<p>The council have previously received odour complaints relating to odour from the site. The most recent complaint was received in 2011. Two complaints were received in 2007, four in 2006, six in 2005 and five in 2004. The complaints relate to odours of onions, meat, chutney or vinegar type smells. The response highlights that some of the complaints have been received from receptors at 'great distance' from the site.</p> <p>No enforcement action was undertaken by the local authority.</p> <p>The Council are concerned that if the odour abatement system isn't managed effectively it is likely that problems may arise. The Council have requested conditions covering the maintenance of any odour abatement to be included in the permit.</p>
Summary of actions taken or show how this has been covered
<p>The operator has included an odour management plan in the permit application. This details that the odour abatement system is cleaned and components are replaced according to a planned preventative maintenance schedule. The operator has committed in their odour management plan to review and adapt the plan when the odour risk changes. This odour management plan has been incorporated into the permit as an operating technique. There is also a condition included which states that the operator shall use appropriate measures to prevent or where it is not possible to minimise odour emissions. Also included is a condition requiring the operator to use a written management system that identifies and minimises risks of pollution including those from maintenance.</p> <p>We consider that the operator has detailed how they will prevent and minimise odour, and how the odour abatement system will be maintained. We are satisfied that the measures the operator proposes will adequately minimise the risk of odour.</p>

Response received from
Anglian Water (response received 10/11/14)
Brief summary of issues raised
<p>Anglian Water confirm that a trade effluent discharge is in place for 'used waters, following pre-treatment through a dissolved air flotation (DAF) plant, arising from food production'. This consent has been updated since the permit application was submitted to reflect a change in company name and some numerical limits. The total volume consented remains 600m³ per day. Anglian Water highlight that there is spare headroom between the amount discharged and the amount they are consented to discharge so the possible increase in the amount discharged as a result of changes on site should still be within the daily consented volume. They state that recent samples have been mostly</p>

compliant with trade effluent consent, and that they are not aware of any local surface water quality issues. They have no issues relating to surface water or groundwater abstractions.

They include that the Applicant must be reminded that should they undertake changes on site which may have an impact on trade effluent quality or quantity they must gain permission from Anglian Water before the changes take place.

Summary of actions taken or show how this has been covered

The emission to Anglian Water has been added to the permit as emission point S1.

We have not reminded the operator that they need to gain permission from Anglian Water before making changes that may affect their effluent as this is beyond the scope of the permit.

Response received from

Public Health England (response received 11/11/14)

Brief summary of issues raised

Public Health England highlight that the site is in a commercial area with the nearest residential receptors 200m to the east and 350m to the south. They recommend that the permit contain conditions to ensure odour from delivery, cooking and manufacture of food products does not impact upon public health.

Public Health England consider that the applicant has provided little detail on how accidents will be dealt with. They request that the Environment Agency ensures the applicant has an accident management plan in place which

- identifies potential hazards, including fires
- assesses the risk associated with the hazards (including an assessment of the potential impact on human health)
- identifies the measures to prevent or mitigate the risks

The consultation response includes that they have no significant concerns regarding the risk to health from the activity as proposed in the application, provided that the operator takes all appropriate measures to prevent or control pollution in accordance with industry best practice or relevant sector technical guidance.

It was recommended we consult the Local Authority and Director of Public Health.

Summary of actions taken or show how this has been covered

As discussed in the key issues section above, the applicant has prepared an odour management plan which has been incorporated into the permit. A condition requiring the operator to use appropriate measures to prevent or minimise odour has been included in the permit.

Our guidance note 'How to Comply with your environmental permit' requires operators to have an accident management plan which forms part of their environmental management system. The application deals with accident risks in the BAT assessment section, odour management plan and environmental risk assessment. The environmental risk assessment includes a section on how risks will be prevented and/or mitigated. We consider that the operator

has adequately the assessed the risks to the environment from accidents and is taking steps to mitigate these. As part of our compliance work, we will ensure an accident management plan is in place.
We consulted with the Local Authority and Director of Public Health.

Response received from
Health and Safety Executive (response received 21/10/14)
Brief summary of issues raised
No comments.
Summary of actions taken or show how this has been covered
None applicable.

We also consulted The Director of Public Health and advertised on our website for public consultation but no responses were received.