Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for Loomswood Abattoir operated by Green Label Foods Limited.

The permit number is EPR/NP3632RX/A001

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

- Description of main features of the installation
- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

Description of the main features of the Installation

The main features of the permit are as follows.

- There are two Schedule 1 activities being undertaken at this installation:
  - Section 6.8 part A(1)(b) – Slaughtering animals at a plant with a carcass production capacity of more than 50 tonnes per day.
  - Section 5.4 part A(1)(a)(i) – Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day through biological treatment.

- An intensive farming installation regulated under Section 6.9 A(1)(a)(i) is located to the north of the slaughter house. Birds from this installation are processed at the abattoir. When defining the installation boundary the decision was made to not include this intensive farm. This decision is fully explained in the key issues section of this Decision Document.

- The installation slaughters ducks, turkeys and geese. Slaughtering of birds takes place over a 6 week period during November and December. During this period the daily throughput will be 143 tonnes per day. For the rest of the year the installation is used for the packing and chilling of the finished products.

- The birds are transported onto the site in modules and are unloaded into the lairage area. The birds are shackled onto a moving line. The birds are killed through the use of a water bath stunner. The birds are then processed. The key stages in the process are slaughtering; de-feathering; evisceration; grading and chilling; cutting and portioning and packaging.

- The Effluent Treatment Plant (ETP) treats process waters from slaughtering. It also treats surface waters produced during the 6 week production period. For the rest of the year surface waters are discharged to a drainage ditch which feeds into the Hasketon Brook. Effluent is directed to a storage lagoon where it is held before being pumped through 2 rotary sieves. The effluent is then pumped to a dissolved air flotation tank (DAF) where solids are precipitated out. Solids are removed from the surface using a scraper and these are collected in an underground pit. This is a sealed double skinned tank. The tank is emptied every 2 days and the integrity is checked monthly. The effluent then flows by gravity to an aerobic secondary treatment plant and then into a tertiary reed bed before being discharge to a drainage ditch which feeds into the Hasketon Brook.

Key issues of the decision

Defining the installation

An intensive farming installation regulated under Section 6.9 A(1)(a)(i) is located to the North of the slaughter house. Birds from this installation are processed at the abattoir. The Environment Agency Guidance RGN2 explains how to define an installation. An installation consists of a stationary technical unit (STU), where one or more activities are carried out and any other directly associated activities (DAA) that support the STU. There must be a technical connection between the intensive farm and the other activities for it to be included within this installation. There are three tests to determine if it is technically connected:

Inevitability - Birds from the intensive farm are the raw material input into the process. There is no connection to the abattoir beyond this. The operator is not restricted in the permit to just accepting birds from this intensive farm. The two activities could be separated as birds could be brought in from other farms. Indeed this is something that the site may do in the future. Therefore, it is not inevitable that birds have to be processed from the adjacent intensive farm.

Practicality – The abattoir is not dependent on the birds from the adjacent intensive farm and could slaughter birds from other farms. Therefore, there are viable alternative practical methods that would allow the abattoir to continue to operate during the 6 week slaughtering period.

Technical need – The abattoir needs a supply of birds in order to sustain its operation. Birds from the adjacent intensive farm will be able to supply the abattoir during part of that period. Other intensive farms across the East of England also feed into the process. The intensive farm provides the raw materials to input into the process, there is not a technical need for it so be undertaken in quick succession but rather to ensure the birds are ready for slaughtering when the abattoir enters the 6 week processing period, hence there is no requirement for storage facilities on site.

Based on the above discussion there is not a technical connection between the intensive farm and the abattoir. In addition one of the following criteria has to be met:

a) they carry out successive steps in an integrated industrial activity - The intensive farm does not part of an integrated industrial activity.

b) one of the listed activities is a directly associated activity (DAA) of the other - The intensive farm is not a DAA of the abattoir.

c) both units are served by the same DAA - The abattoir and intensive farm are both served by the effluent treatment plan (ETP).

The principle user of the ETP is the abattoir. Only surface water is directed to the ETP from the intensive farm. Therefore, the ETP is only a Directly Associated Activity to the abattoir.

As there is not a technical connection and one of the above criteria has not been met then the intensive farm does not form part of the STU.

Odour

The nearest sensitive receptors are as follows.

- 624309,253141 - Loomswood Farmhouse, west of the site directly adjacent to the installation. Occupied by the Company Directors of the installation.
- 624248,253272 - Commercial premises 135m North West of the site.
- 624728,253581 - Further Hall Farm, 250m North of the site.
- 625193,253116 - Hall farm, 436m to the East of the site.
- 624432,252648 - Looms Farms House, 450m South of the site.
- 624491,254181 - Village of Debach, 880m North of the site.

The applicant has provided an Odour Risk Assessment with their application. This outlines the potential odour sources from the installation and the mitigation measures that are in place in each instance. The operator has also provided details of the contingency measures that would be implemented should an odour issue arise. Based upon these proposals the Odour Risk Assessment considers that the risk of odour is not significant. We agree with this conclusion for the following reasons.

- We consulted with Environmental Health during this determination. There is one record of odour arising from this site which was in relation to a smell of burning oil, dated October 2009. There have been no further complaints since this date.
- Production at the site increased to 143 tonnes per day during the 6 week processing over November and December 2015. During this period no complaints were received by Environmental Health.
- Slaughtering is undertaken over a 6 week period during the winter months. During this time temperatures are typically lower than the rest of the year. Over this 6 week period the risk of exposure to any potential odours is low, in addition lower temperatures will generate less odour from potential odour sources. This is reflected in the Environment Agency's H4 Odour guidance where minimising temperatures is a recognised odour control measure. Refrigeration of blood tanks is also a recognised mitigation measure in the Environment Agency's '*Supplementary odour guidance for abattoirs and poultry processes (June 2010)*'.

Should there be any change to the amount of material processed at the site or duration of the slaughtering period then a more detailed Odour Management Plan may be required.

Blood Storage Tank

The blood storage tank does not have in place a number of the indicative BAT measures stated in the Food and Drink BREF. These are that the tank is single and not double skinned, no high level alarm is fitted and the tank does not have any end of pipe odour treatment in place. An improvement condition has therefore been included which requires the operator to review the blood storage tank against the Food and Drink BREF. Any deviation from the indicative BAT measures should be fully justified and a programme of works put in place to ensure compliance with BAT as required.

In the event of a small spill from the tank the blood would be directed to the ETP. In the event of a larger spill, sand would be used to absorb the blood which would then be suitably disposed of by a licensed disposal company. In the event of the tank rupturing the blood would be collected in the storage lagoon and then tankered off site. This approach minimises the volumes of blood sent to the ETP avoiding overloading in the event of a spill, which would result in the plant being ineffective.

Discharge to water

The ETP has an Environment Agency discharge consent (EPR/BP3326XB). The operator has confirmed that they will still be within the volumetric and environmental limits set out in this consent at the increased production of capacity of 143 tonnes per day.

The volumetric and environmental limits used in the discharge consent are based upon Monte Carlo predictive modelling undertaken by the Environment Agency. Therefore, as long as the operator remains within these limits then it is predicted that there will not be an impact from this discharge on the receiving water course. If it is anticipated that the volume of discharge will exceed what is set out in the consent then a variation will be required which will include an assessment of the potential impact on the watercourse at the increased volume.

The operator was asked if they wanted the discharge consent consolidated with this installation permit. They wanted the two to remain separate. However, having had discussions with the area office the practicality and better control of regulating the site would mean that we may need to incorporate the discharge consent into the permit at a later date. We expect to do this through an Environment Agency led variation. Any such consolidation may require a review of permit limits and monitoring requirements.

Annex 1: decision checklist
This document should be read in conjunction with the application, supporting information and permit/notice.

Aspect considered	Justification / Detail	Criteria met Yes
Receipt of submission		
Confidential information	A claim for commercial or industrial confidentiality has not been made.	✓
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.	✓
Consultation		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements. For this application we consulted the following bodies: • Environmental Health – Suffolk District Council • Health and Safety Executive	✓
Responses to consultation and web publicising	The consultation and web publicising 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 our guidance on what a legal operator is.	✓
European Directives		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
The site		

Aspect considered	Justification / Detail	Criteria met Yes
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 including discharge points. 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– guidance and templates (H5).	✓
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat . 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 site. We have not formally consulted on the application. The decision was taken in accordance with our guidance. We have completed an Appendix 11 assessment and have sent a copy to Natural England for information only.	✓
Environmental Risk Assessment and operating techniques		
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory. <u>Emissions to Air</u> There are two steam raising boilers that are used at this installation. The Main Boiler which has a thermal input of 1.8MW and a Hired Boiler with a thermal input of 1.2MW which is used at the installation during the 6 week slaughtering period. The operator has provided an	✓

Aspect considered	Justification / Detail	Criteria met Yes
	assessment of the air emissions from these boilers which uses H1 methodology. We have used the input data from this work and have run the Environment Agency's H1 screening tool. The emissions have screened out from requiring any further assessment. <u>Emissions to Water</u> During the 6 week processing period surface water is discharged to the ETP. During the rest of the year surface water is directed to a drainage ditch which discharges to the Hasketon Brook. Although it is not typical for surface water to be directed to an ETP as it is not cost effective or energy efficient to do so. However, it does ensure that any small spills will automatically be treated at the ETP and it is also for a relatively short period of time each year (6 weeks). This approach is therefore, considered to be acceptable. For details regarding the discharge from the ETP please see the key issues section. <u>Emissions to Ground</u> The installation is located on a concrete surface with sealed drainage. There is not expected to be any emissions to ground.	
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. The operator has provided a Best Available Techniques Assessment (BAT). This sets out what is proposed at this installation and how this complies with what is considered to be BAT as set out in the documents listed. Further detail on how the installation will comply with the Treating and Processing Poultry Sector guidance (EPR 6.11) was provided in the Schedule 5 #2 response and the response to the request for information, received on 15/06/16. Some of the BAT measures include: • Raw materials are kept out of the wastewater system through the use of catch pots. This reduces the Biological Oxygen Demand (BOD) of the waste water and prevents drains from becoming blocked. • Spill management procedures are in place for the blood tank. The amount of blood treated by the	✓

Aspect considered	Justification / Detail	Criteria met Yes
	ETP is minimised as only small spills will be treated by the plant. In the event of a larger spill/ rupturing of the tank the blood will be collected and taken off site. • Category 2 and Category 3 animal by-products are sent to a licenced contractor for recovery. The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions.	
The permit conditions		
Raw materials	We have specified limits and controls on the use of raw materials and fuels. The operator has specified the % sulphur content of the fuels used at this installation. The use of low sulphur fuels (less than 1.2%) is one way to control sulphur emissions from combustion plant (Combustion Sector Guidance EPR 1.01). The sulphur content of the fuels used at this installation are considerably below this value. In order to ensure that the operator continues to use a low sulphur fuel we have specified that the sulphur content of the fuel should be less than 1.2%.	✓
Improvement conditions	Based on the information on the application, we consider that we need to impose improvement conditions. We have imposed improvement conditions to ensure that: • IC1 has been included to ensure that appropriate containment measures are in place for the blood storage tank to ensure accidents that may cause pollution are minimised. • IC2 has been included to ensure that appropriate containment measures are in place for collection of Category 2 and Category 3 animal by-products to ensure accidents that may cause pollution are minimised. • IC3 has been included to ensure that appropriate containment measures are in place for the storage tanks to ensure accidents that may cause pollution are minimised.	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	• IC4 has been included to ensure that appropriate systems are in place to alert staff to any abnormal/emergency situations at the ETP.	
Incorporating the application	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 determination process. These descriptions are specified in the Operating Techniques table in the permit.	✓
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 our guidance on what a competent operator is. The operator provided a summary of their Environment Management System with the application.	✓
Relevant convictions	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found.	✓
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 our guidance on what a competent operator is.	✓

Annex 2: External Consultation and web publicising

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process. (Newspaper advertising is only carried out for certain application types, in line with our guidance.)

Response received from
Environment Protection Team – Suffolk District Council
Brief summary of issues raised
In their initial response of 12/04/16 they stated that after reviewing the documentation submitted with the application they have no objections or adverse comments to the proposal. In response to this we asked if there had been any recent complaints at the site. The contact at the Environment Protection Team confirmed (email of 18/04/16) that there had been no recent complaints. He also provided details of the complaint history from the site that is held on record: *"Looking back in our records I can report that there was;* • *An odour complaint regarding a burning oil smell in October 2009;* • *a tonal fan noise problem which arose in May 2008 and recurred in July 2009;* • *a waste disposal and slurry complaints which arose in July 2006 and again in June 2009. None of which I believe were related to the abattoir."*
Summary of actions taken or show how this has been covered
Non required

Health and Safety Executive were also consulted and no response was received.

The application was advertised on our website from 22/03/16 to 21/04/16. No comments were received.