

# Environment Agency permitting decisions

## Variation

We have decided to issue the variation for Treburley Abattoir operated by Dawn Meats (U.K.).

The variation number is EPR/LP3033WQ/V002.

This permit was determined as a substantial variation to the permit and was duly made on 03/11/14.

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 responses

## Key issues of the decision

The variation authorises the following changes to the permit:

- Increase in cattle throughput to 200 carcasses per day.
- Following increase in throughput the capacity of the deboning line now exceeds the 75 tonnes per day threshold and the cutting plant is now incorporated as a activity in its own right under Section 6.8 Part A (1)(d)(i).
- The waste water treatment plant (WWTP) is expanded to incorporate a second membrane bio-reactor (MBR) and to increase the daily treated effluent volume consent limit to 250m<sup>3</sup>/day.
- Table S3.2 is updated to reflect the revised emission limits and monitoring requirements following the increase in daily effluent discharge volumes.

- 5<sup>th</sup> quarter processing (stomach and hoof processing) is incorporated as a directly associated activity to the permit and associated emission point to air A3 is added to table S3.1 for the hoof processing vent.
- The existing ambient underground blood tank is replaced with an above ground refrigerated blood tank with two air displacement vents A4a and A4b.
- An additional hot water boiler is added to the permit under a new emission point to air, A5.

The key issues associated with this variation are:

- Increase in effluent volumes
- WWTP expansion
- Modelling the impact of the increased effluent discharge volumes
- Bunding and containment for the new WWTP tank
- 5<sup>th</sup> quarter processing
- Odour
- Emissions to air from the new boiler
- Mercury and cadmium monitoring and reporting requirements
- Capacity of the deboning line

### Increase in Effluent Volumes

The operator has requested the daily effluent volume be increased from 74m<sup>3</sup>/day to 250m<sup>3</sup>/day. The breakdown of the increased volumes are as follows:

Process	Predicted wastewater volumes
Increase in slaughtering to 200 cattle per day	200 m <sup>3</sup> /day
Addition of 5 <sup>th</sup> quarter Processing	23 m <sup>3</sup> /day
Rainwater	39 m <sup>3</sup> /day
Recovery of final effluent	-15 m <sup>3</sup> /day
<b>Total</b>	<b>247m<sup>3</sup>/day</b>

Our how to comply guidance document for the red meat processing EPR 6.12 indicates that the operator should meet the following indicative BAT requirements for water consumption:

Indicative BAT	Operators Proposals
1. Use re-circulating system to recycle water	The operator recovers some of the final effluent water post MBR treatment for washing down the lairage and for farmers to clean farm vehicles after delivery of cattle. The paunch (stomach) washing unit is designed to recycle 20% of the total water usage within the process.

<p>2. Interlock chemical dosing pumps with cleaning operations, so that dosing does not continue after cleaning is complete</p>	<p>The pH buffering and phosphate coagulant at the WWTP will be automatically dosed. Membrane cleaning will be carried out as required and chemicals will be dosed manually.</p> <p>The increase in throughput, 5<sup>th</sup> quarter processing and the transition of blood from a waste to a saleable product will increase the chemical use at the installation. Chemical dosing for cleaning is carried out manually at the installation.</p>
<p>3. Meet the following bench mark water consumption for cattle of 700-1,000 litres per animal.</p>	<p>The operator has predicted the breakdown the water consumption from the slaughter of cattle at 1,000 litres per animal. This variation requests for further capacity of 50m<sup>3</sup>/day for 5<sup>th</sup> quarter processing and rainfall. There has been an increase in volume for rainfall even though there is no change to the size of the site drainage system. The operator has identified that with the increase to 200 cattle per day the 90m<sup>3</sup> balance tank would have a reduced available capacity to accommodate for prolonged rainfall events.</p> <p>A further increase has been requested for the 5<sup>th</sup> quarter processing. The operator has provided a further breakdown of these calculations within the application.</p>

We believe the operator is taking appropriate methods as described above to meet the indicative BAT requirements for water consumption with the requested increase in daily volume discharge from the WWTP.

### **Expansion to the WWTP**

The current WWTP system is a 180m<sup>3</sup> pre-aeration balancing tank and Membrane Biological Reactor (MBR). To cope with the increase in site capacity and increased water use from 5<sup>th</sup> quarter processing the site must expand the current WWTP. The current MBR plant is only designed to cope with a maximum of 104m<sup>3</sup>/day. The operator is requesting a daily increased permit limit of 250m<sup>3</sup>/day and therefore expansion to the existing WWTP is essential for continued effective treatment of the effluent produced from the site.

The expansion will comprise of a second 180m<sup>3</sup> integrated MBR tank, located adjacent to the existing tank. The new MBR tank will be fitted with two membrane cassettes and the average daily treatment capacity will be 150m<sup>3</sup>/day. The new plant will be designed to enhance the removal of phosphorous by a chemical precipitation process, achieved through dosing of a coagulant. The differential pressure across the membranes is continuously monitored for membrane failure, while an inline turbidity meter monitors effluent quality. The WWTP operation is checked regularly and plant operation

is supervised by a SCADA system. In the event of a plant malfunction, the plant will alarm.

The expansion of the WWTP will ensure that optimum retention times for treatment are maintained. The operator has proposed that the new WWTP will be able to achieve the following effluent quality:

Parameter	Unit	Limit
Flow	m <sup>3</sup> /day	250
BOD	mg/l	10
Suspended Solids	mg/l	10
Ammoniacal Nitrogen (as N)	mg/l	10
pH	-	6-9

The existing WWTP system provides effective treatment of the waste water produced at the site and is compliant with the current permit limits with no reported breaches. The increased waste water will not change in nature and we concur with the operator the proposed plant expansion is suitable and appropriate to effectively treat the increase in effluent volume prior to discharge to the River Inny.

#### **Modelling the impact of the increased effluent discharge volume**

The current permit limits the maximum daily discharge volume of process effluent to 74m<sup>3</sup>/day. The concentration of biochemical oxygen demand (BOD), suspended solids, and ammoniacal nitrogen are each limited to 10mg/l. The H1 risk assessment submitted by the operator in 2006 stated that effluent standards of 20mg/l BOD, 30mg/l suspended solids and 10mg/l ammoniacal nitrogen would be protective of the River Inny. However, our decision was to impose permit limits based on plant performance.

The site is increasing the slaughtering capacity to 200 carcasses per day and will include 5<sup>th</sup> quarter processing, therefore the volume of process effluent to be treated and discharged will subsequently increase. The operator proposes to increase the discharge volume in two phases. The first phase will not require any changes to the site waste water treatment plant but the volume of treated effluent discharged is expected to increase from 74m<sup>3</sup>/day to 100m<sup>3</sup>/day. It is expected that the maximum daily discharge volume will increase to 250m<sup>3</sup>/day in the second phase whereby expansion of the treatment plant is required.

#### *Risk assessment*

We have assessed the potential impact of the increased discharge using our principle of 'no deterioration.' When we review permits for existing discharges our aim is to issue permits that prevent or minimise any deterioration in the quality of the water bodies that could otherwise occur as a result of the discharge. We refer to this as 'no deterioration' and our ideal is for no increase in the planned pollutant load discharged to the water body. Where this is not possible, we will limit any within-class deterioration as far as possible. We must maintain the Water Framework Directive (WFD) status of

water bodies. This may exceptionally require action beyond the requirement for no increase in the permitted load to the water body.

The receiving watercourse is designated under the Water Framework Directive (WFD) and the name of the water body is Lower River Inny. The watercourse is currently predicted to meet overall good ecological and chemical status by 2015. Its current WFD classification, based on monitoring data downstream of Treburley Abattoir at Beal's Mill Bridge, is BOD (High status), Ammonia (High status) and Phosphate (Moderate status). Phosphate monitoring also shows a deterioration in status when comparing data from Trecarrell Bridge (upstream of the abattoir) and that from Beals Mill Bridge. The WFD status has deteriorated from 'Good' to 'Moderate' between these monitoring points. There are no other significant discharges in the vicinity of the Treburley Abattoir discharge.

The programme 'Mass Balance Calc' (Monte Carlo) was used to model the impact of the proposed increased discharge volume and thus determine what limits would be acceptable for BOD and Ammonia. The South West SIMCAT model was used to determine what limit would be acceptable for Total Phosphorous.

#### *Biochemical Oxygen Demand*

The maximum BOD concentration from the last 12 months of operator monitoring is 6mg/l. Monte Carlo modelling using the operator's effluent quality data demonstrates that the current discharge is having a negligible effect on receiving water quality. If effluent was discharged at the existing permit limit of 10mg/l, the deterioration in receiving water quality would still be negligible.

Such is the dilution available in the River Inny, receiving water quality is still not expected to deteriorate with a maximum daily discharge volume of 100m<sup>3</sup> and an effluent concentration of 10mg/l. A deterioration of 0.6% can be expected with a maximum daily discharge volume of 250m<sup>3</sup> and an effluent concentration of 10mg/l. The watercourse would remain within the WFD 'High status' class.

Modelling has shown that whilst the polluting load would increase, it is reasonable to continue to apply a limit of 10mg/l because a) it is protective of the WFD class status of the watercourse; b) deterioration in receiving water quality will be negligible; and c) effluent quality results supplied by the operator indicate that an effluent quality of 10mg/l should be achievable with the technology proposed. Furthermore we are satisfied that a 10mg/l BOD limit would not be inconsistent with the indicative BAT (Best Available Techniques) requirements for this industry sector.

#### *Ammonia*

Monte Carlo modelling using the operator's effluent quality data demonstrated that the current discharge is having a negligible effect on receiving water quality.

Receiving water quality can be expected to deteriorate by 5.7% with a maximum daily discharge volume of 100m<sup>3</sup> and an effluent concentration of 10mg/l. Deterioration in water quality can be expected to increase to 24.6% with a maximum daily discharge volume of 250m<sup>3</sup> and an effluent concentration of 10mg/l. The watercourse would however remain within the WFD 'High status' class.

Whilst modelling has shown that the polluting load would increase, we consider it reasonable to continue to apply a limit of 10mg/l because a) although the deterioration in water quality cannot be considered negligible, it is not inconsistent with our guidance, and is nevertheless protective of the WFD class status, and; b) the effluent quality results supplied by the operator indicate that an effluent quality of 10mg/l should be achievable. Furthermore we are satisfied that a 10mg/l ammonia limit would not be inconsistent with the indicative BAT requirements for this industry sector.

#### *Phosphate*

A phosphate limit is not included on the current permit for a maximum daily discharge of 74m<sup>3</sup>/day. The South West SIMCAT model was used to derive the phosphate limit required for the proposed increase in the discharge volume. The SIMCAT model predicted that a limit of 5mg/l would be appropriate for both a maximum daily discharge scenario of 100m<sup>3</sup>/day and 250m<sup>3</sup>/day.

Having considered the operator's current monitoring results, they will not be able to achieve a standard of 5mg/l immediately. Monte Carlo modelling indicates that the effluent concentration would need to exceed 74mg/l before receiving water quality would deteriorate beyond the 'Good status' class limit. Therefore, for a maximum daily discharge volume of 100m<sup>3</sup>/day we consider it reasonable to include a 'standstill' permit limit of 11mg/l (annual mean) based on current plant performance. We consider that a 5mg/l (annual mean) permit limit should apply to the proposed daily discharge volume of 250m<sup>3</sup>/day.

#### *pH / Oil & Grease*

The inclusion of a pH range of 6-9 and descriptive control for visible oil or grease i.e. 'No significant trace' are also proposed as these are standard permit conditions for trade discharges of this nature.

#### *Suspended solids*

There is no suspended solids data available for water quality upstream of the abattoir discharge. As with BOD and Ammonia, we consider it reasonable to continue to apply a 10mg/l limit. Apart from one anomaly, effluent quality results provided by the operator show that compliance with a 10mg/l limit is achievable.

*Summary of changes to permit limits*

<b>Parameter</b>	<b>Existing Discharge vol 74m<sup>3</sup>/day</b>	<b>New Discharge vol 250m<sup>3</sup>/day</b>
Biochemical Oxygen Demand (BOD)	10mg/l	10mg/l
Ammoniacal Nitrogen	10mg/l	10mg/l
Suspended Solids	10mg/l	10mg/l
Turbidity	No limit	No limit
Phosphate	No limit Set	11mg/l for an effluent flow up to 100m <sup>3</sup> /day  5mg/l following the WWTP upgrade for an effluent flow up to 250m <sup>3</sup> /day
pH	6-9	6-9
No visible oil or grease	Not in permit	No significant trace

**Bunding of new WWTP systems**

The 180m<sup>3</sup> MBR tank will be located adjacent to the existing tank on a non-permeable concrete base. There is no bund around the tank, however a retaining wall is located at the back and side of the tank base and all drains within the area are linked directly back into the WWTP system. The tank levels are managed with fixed instrumentation linked to the operating system. In the event that the tank exceeds a high level set point an alarm will sound locally. During working hours alarms will be detected by operators working within the area, and out of hours the 24 hour security conduct regular walk around whereby if an alarm is detected the security will contact the appropriate site personnel.

The additional chemicals will be provided with bunding to 110% of the volume of chemicals stored as per the current storage arrangements.

Although there is no bunding arrangement proposed for the new MBR tank we are confident the ground and nearby drainage system will retain a spill and appropriate measures are in place to detect high levels within the tank.

**5<sup>th</sup> Quarter Processing**

The new 5<sup>th</sup> quarter processing facilities will further process animal products from the beef carcass previously sent for rendering to sale to an international market.

*Paunch Processing*

To prepare stomachs for sale they are required to be washed at a high temperature. After washing the paunch is transferred to a refiner for the removal of the fat on the outside surface of the stomach. A water recycler will reuse more than 20% of the waste water produced. There should be no odour emissions from the paunch process. The increase in water usage has been modelled for impact as described in the sections above.

### *Hoof Processing*

To prepare the hooves for sale, they are cleaned and de-haired. Hooves are placed in a rotating gig and are passed by fixed high temperature propane gas torches, the daily gas usage is estimated to be approximately 15kg. This vents to within the dirty yard area, via new exhaust to air, emission point A3. Following the removal of heavy hair the hooves are placed within a de-hairer unit where the hooves are scalded to remove the finer hairs. See odour section of key issues for considerations to odour from the hoof processing.

### **Odour**

The site has a system for logging complaints since the installation of the ISO14001 environmental management system in 2007. There is no history of odour complaints since 2007. We have identified the potential new sources of odour from this variation to be:

- Hoof processing
- Blood storage
- Addition of a new MBR tank

### *Hoof processing*

The hoof processing is already in operation at the installation and no odour has been detected at the vent exhaust by the activities during a site visit from the Environment Agency and no complaints from nearby residents have been received. We agree with the operator that odour is low from the hoof processing.

### *Blood storage*

The operator is proposing a new refrigerated blood storage system. The refrigeration of blood has the benefit of reducing the potential for blood to turn odorous.

- Anticoagulants will be added to keep the blood as fresh as possible and prevent coagulation within the pipework.
- The blood will pass through rota-screen on entry into the blood tank to filter the incoming blood.
- Blood will be refrigerated to below 10°C (Degrees Celsius). This will inhibit the blood turning odorous (chilled from approximately 15°C to below 5°C).
- Refrigerated blood will be stored on site for short periods of time and will be removed from site 2/3 times per week.
- After dispatch the blood tanks and pipework are cleaned and sanitized to reduce the risk of soiling the next batch of blood. The wastewater arising from cleaning enters the effluent drainage system to the WWTP.
- The blood is collected by road tanker, the road tanker vents to ground close to the vents within the blood tank.
- Blood not fit for sale (condemned) is stored in a sealed subsurface tank and dispatched from site without delay.
- Tanker drivers supervise each collection, any spills are cleaned up without delay.



Indicative Best Available Techniques (BAT) refers to activated carbon filters on blood storage tank vents. However the operator's proposals include; refrigeration to less than 10°C, regular emptying of the tank and provision of regular cleaning to maintain tank cleanliness. We conclude that there is no requirement for additional odour abatement for the proposed refrigerated storage.

#### *Additional MBR tank*

The existing MBR tank is an open 180m<sup>3</sup> tank, of which there is minimal odour released. There has been no complaints received in relation to the odour from the existing MBR process. The effluent is treated as it is produced to avoid stagnation. The new tank will be built to the same specification as the existing tank. There is likely to be more blood and stomach content within the waste water from the washing of the refrigerated blood tanks and the 5<sup>th</sup> quarter processing. The residues within the blood tanks and associated pipework should be minimal as blood is now being sold as a product. Front end filters will remove the majority of stomach content prior to entering the MBR tank. The majority of waste water will be similar to the existing processes. The level of odour from the WWTP will increase by having two open topped tanks rather than the existing one. However we agree with the operator that the odour from the new MBR tank will be insignificant on the nearby environment.

#### *Summary*

The refrigerated blood storage will result in an odour reduction for the site. The hoof de-hairing is already in operation with no detected odour. The new MBR tank should have the same odour as the existing tank, which we consider insignificant. The operator has stated that regular odour checks are carried out at the installation. We can conclude that the changes made to the site a result of this variation should have an insignificant impact on the odour levels from the installation.

### **Emissions to Air**

#### *New Boiler*

The new hot water boiler has a thermal capacity of 500kW. Taking the total capacity of all three boilers to 730 kWh. Due to the size of the combustion plant we do not need to assess the combustion emissions to air. We can conclude that the emissions from the new boiler are considered insignificant.

### **Mercury and Cadmium permit requirements**

The operator has requested that the mercury and cadmium annual mass balance and monitoring requirement be removed from the permit. Mercury and Cadmium are Priority Hazardous Substances under the Environmental Quality Standard (EQS) Directive (a daughter directive of the WFD) and so where possible we expect operators to minimise the input of these impurities by sourcing dosing material that contain minimal impurities. The operator has been informed that if the chemicals which contain cadmium and mercury (currently Sodium Hypochlorite and Maxichlor Plus) are no longer used at the site the limits can be removed from the permit.

The operator has calculated the volumes of mercury and cadmium in all the chemicals used over the past twelve months. The mercury content is calculated at 0.1265g and cadmium at 0.0253g against an annual limit of 0.19g and 0.12g respectively. Because the operator is proposing to increase the capacity of the site from 70 carcasses per day to 200 carcasses per day the chemical usage is likely to increase. We therefore believe that the limits should remain within the permit at this time.

### **Capacity of the deboning line**

The directly associated activity for the cutting plant was limited to 75 tonnes per day. With the increase throughputs the capacity of the deboning line will increase above this threshold and now falls under a scheduled activity in its own right.

*Section 6.8 A1 (d) (i) Treating and processing materials intended for the production of food products from—*

*(i) animal raw materials (other than milk) at a plant with a finished product production capacity of more than 75 tonnes per day;*

Our regulatory guidance note 2 (RGN2) provides further clarification on the definition of 'treating and processing materials'. Stating that de-boning does change the raw material and as it is not readily reversible, it is considered treating and processing.

The operator has provided detail on the capacity of the deboning process by response to a Schedule 5 request for information on 06/01/15 confirming that the capacity of the deboning process now exceeds 75 tonnes per day. The activity has been added to Table S1.1 of the permit.

## 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
<b>Consultation</b>		
Scope of consultation	The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.	✓
Responses to consultation	The web publicising responses (Annex 2) were taken into account in the decision.  The decision was taken in accordance with our guidance.	✓
<b>Operator</b>		
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.	✓
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓
<b>The site</b>		
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. <ul style="list-style-type: none"> <li>• A site plan has been provided with the application showing the location of the new WWTP.</li> <li>• A site plan has been provided within the application showing the new emission points to air.</li> </ul> There is no change to the installation boundary as a result of this variation.	✓
Biodiversity, Heritage,	The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
Landscape and Nature Conservation	<p>protected species or habitat .</p> <ul style="list-style-type: none"> <li>• A Special Area of Conservation (<i>Phoenix United Mine and Crow's Nest</i>) is located within 10,000m of the installation.</li> <li>• 7 local wildlife sites are located within 2,000m of the installation.</li> </ul> <p>The combustion process at the Pollution Prevention and Control (PPC) installation is not considered '<i>relevant</i>' for assessment under the Agency's procedures which cover the Conservation (Natural Habitats &amp;c.) Regulations 1994 (Habitats Regulations). This was determined by referring to the Agency's guidance 'AQTAG014: Guidance on identifying '<i>relevance</i>' for assessment under the Habitats Regulations for installations with combustion processes.' Thus no detailed assessment of the effect of the releases from the installation's combustion processes on SACs, SPAs and Ramsar sites is required.</p> <p>The increase in discharge volume has been modelled we have imposed limits for phosphate as a result.</p> <p>There are no changes to emissions to land.</p> <p>A full assessment of the application and its potential to affect the site has been carried out as part of the permitting process. We consider that the application will not affect the site.</p> <p>See key issues for further information.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance. An Appendix 11 form was completed concluding no likely significant impact and submitted to Natural England for information only.</p>	
<b>Environmental Risk Assessment and operating techniques</b>		
Environmental risk	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The risk assessment provided with the application</p>	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
	concludes that all significant risks are mitigated via operating techniques and infrastructure controls.	
Operating techniques	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>How to comply with your environmental permit:</p> <ul style="list-style-type: none"> <li>• EPR 6.10 Additional guidance for the food and drink sector</li> <li>• EPR 6.12 Additional guidance for the red meat processing (cattle, sheep and pigs)</li> </ul> <p>The proposed techniques/ emission levels for priorities for control are in line with the benchmark levels contained in the Technical Guidance Note and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions.</p> <p>We consider that the emission limits included in the installation permit reflect the BAT for the sector.</p>	✓
<b>The permit conditions</b>		
Updating permit conditions during consolidation.	<p>We have updated previous permit conditions to those in the new generic permit template as part of permit consolidation. The new conditions have the same meaning as those in the previous permit(s).</p> <p>The operator has agreed that the new conditions are acceptable.</p>	✓
Raw materials	We have specified limits and controls on the use of raw materials and fuels.	✓
Improvement conditions	<p>The improvement condition log has been updated indicating completion of the outstanding improvement conditions.</p> <p>We have incorporated a new improvement condition (IC17) as a result of this variation because of a recent breach of the permit whereby blood residue was found in the surface water drain at the installation.</p>	✓
Incorporating	We have specified that the applicant must operate the	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
the application	<p>permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>	
Emission limits	<p>We have decided that emission limits should be set for the parameters listed in the permit.</p> <p>We have modelled the impact of the treated effluent discharge to controlled waters with an increased daily volume at 250m<sup>3</sup>/day.</p> <p>It is considered that the numeric limits imposed will prevent significant deterioration of receiving waters. We have imposed numeric limits because either a relevant environmental quality or operational standard requires this.</p> <p>We have included a limit for phosphate following the increase in discharge. We have also incorporated the requirement that there shall be no significant trace of visible oil or grease in the effluent discharge to river.</p> <p>See key issues for information.</p>	✓
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>The monitoring requirements have been updated to reflect changes made to Table S3.2.</p>	✓
Reporting	<p>We have specified reporting in the permit.</p> <p>The reporting requirements have been updates to reflect changes made to Table S3.2.</p>	✓
<b>Operator Competence</b>		
Environment management	There is no known reason to consider that the operator will not have the management systems to enable it to	✓

Aspect considered	Justification / Detail	Criteria met
		Yes
system	comply with the permit conditions. The decision was taken in accordance with Regulatory Guidance Note 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 Regulatory Guidance Note 5 on Operator Competence.</p>	✓

## Annex 2: Consultation responses

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

Response received from
Public Health England (response received 14/11/14)
Brief summary of issues raised
Potential exists to cause nuisance in respect of dust, odour and noise from the operation itself and any variation being granted needs to ensure these are managed. Provided the installation complies with the Regulatory requirements, there is unlikely to be any significant adverse impact upon public health. In relation to the proposed new combustion plant we ask that the Regulator confirms that this will not have any significant impact on local air quality.
Summary of actions taken or show how this has been covered
Considerations to odour, noise and dust has been made during the determination process. The new boiler is 500kWh, a size at which we consider emissions to air to be insignificant. See key issues for further information.

Response received from
Natural England (response received 20/11/14)
Brief summary of issues raised
Natural England has received the above consultation. Please would you indicate if it is relevant to any designated sites (SSSIs or SACs) and if so if you intend to consult us via the agreed formal consultation process i.e. on an Appendix 11 and/or Appendix 4.
Summary of actions taken or show how this has been covered
An appendix 11 was completed and sent to Natural England for information only, concluding no likely significant impact. No further response was received.

Response received from
Cornwall Council Public Protection (response received 3/12/14)
Brief summary of issues raised
This Department is not aware of any current amenity problems caused by the above site or of any current enforcement action being applied to the above site.
Summary of actions taken or show how this has been covered
No further action required.

Consultations were also sent to the following organisations and no responses were received:

- Food Standards Agency
- Health and Safety Executive