

# **Environment Agency permitting decisions**

## **Bespoke permit**

We have decided to grant the permit for Crewe Animal Feed Mill operated by ForFarmers UK Limited.

The permit number is EPR/YP3734RQ/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**

Crewe Animal Feed Mill, operated by ForFarmers UK Limited, is an installation located in Crewe, Cheshire which manufactures compound animal feeds which are suitable for consumption by an animal without further processing.

The site has been operating since the early 1970s and was previously regulated under the Part B LAPPC regime but now requires a Part A environmental permit following the 2013 update to the Environmental Permitting Regulations which implemented the Industrial Emissions Directive. This redefined the thresholds for the food and drink sector based on the maximum production capacity of the installation:

*Section 6.8 Part A(1)d(ii) – Treatment and processing of vegetable raw materials with a finished product capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year.*

The key processes undertaken at the installation are receipt and storage of raw materials, weighing, grinding, mixing, conditioning, pressing, cooling, coating, bulk storage and dispatch. The main emissions to air arise from a grinder, two coolers and two natural gas fired boilers (aggregated thermal input 2.63 MW). Emissions to water arise from site run-off which discharges to Gresty Brook, with effluent from vehicle cleaning and boiler blow down discharging to sewer.

There are no designated SSSI's within 2 kilometres of the installation. West Midland Mosses SAC lies 4.5 Km to the south west of the installation, with Midland Meres and Mosses Phase 1 and Phase 2 Ramsar sites 6.6 Km to the south east and 4.7 Km to the north east respectively.

## **Key issues of the decision**

The application submission contains a number of supporting documents that describe the controls and operating techniques at the installation, having regard for Best Available Technique (BAT) requirements, as specified in our guidance, and to ensure compliance with the environmental permit conditions. The key controls and techniques are described in the following sections.

### **General Management**

The installation has an Environment Management System (EMS) in place which is consistent with the requirements and principles of the ISO14001 standard and will be formally certified to the standard by accredited external assessors.

These formal policies and procedures address the environmental aspects of the operation of the installation. Procedures have been implemented for the identification, assessment and management of the most significant operational aspects of the activities undertaken on site to ensure they are safe, efficient, sustainable and have minimal environmental impact.

Preventative maintenance is also operated at the site with operating procedures and work instructions to assist in the identification, review and prioritisation of maintenance activities, with environmental considerations being explicitly addressed in the scheduling of maintenance activities.

The requirement for an EMS is also maintained through the permit conditions.

### **Odour**

Odorous raw materials are consumed in the process and the installation could have the potential to cause odorous emissions, primarily through various stages of the process such as receipt of raw materials and cooling. However, monitoring of odours at the boundary of the installation (“sniff testing”) indicates that the off-site impact of the plant is not significant and the installation has never been the source of any odour complaints.

At this stage, we are satisfied that a site specific Odour Management Plan (OMP) is not required beyond the controls detailed in the EMS. However, the permit conditions contain a provision for the Environment Agency to request the operator to produce and implement an OMP should activities give rise to odour beyond the installation boundary.

### **Noise and vibration**

As part of the ongoing operating and maintenance procedures implemented at the site, noise assessments for key operational equipment are undertaken and corrective action is taken in the event that a specific item of equipment is emitting an abnormal noise. The site is not considered to be the source of any significant off-site noise.

Notwithstanding the above, the permit conditions contain a provision for the Environment Agency to request the operator to produce and implement an Noise Management Plan (NMP) should activities give rise to noise beyond the installation boundary.

## **Fugitive emissions**

### Emissions to air

There are several potential sources of fugitive emissions to air from the installation. The operator has identified these and has procedures in place to ensure these are managed and minimised, such as:

- Preventative and reactive maintenance programmes to minimise leaks from the process;
- The storage and maintenance of dusty materials within enclosed or covered areas (such as silos for bulk materials, primary packaging for packaged materials and skips for waste);
- The use of abatement equipment;
- Effective housekeeping;
- External cleaning of the process building and stockyards.

In general, fugitive losses in the areas of highest potential release (the raw material intake area) are minimised by careful process control to maximise extraction to the filters serving the intake. The site buildings are also maintained to ensure that they remain, wherever possible, dust tight (e.g. by only keeping process building doors open when necessary). All other operations are managed such that losses of both raw materials and products are avoided.

### Emissions to sewer, surface water and groundwater

Fugitive emissions to water could potentially arise through spillages, leaks and firewater discharge. There are a number of procedures in place to minimise potential fugitive emissions to water from the installation, such as impervious surfaces, spill containment kerbs, sealed construction joints and bunding, where appropriate.

Operational procedures are in place to ensure that all spills and leaks are promptly reported, managed and mitigated. The condition of the drains at the installation is periodically checked to ensure that the potential for effluent to leak to ground is minimised. Any maintenance that is required following drainage condition surveys is conducted by approved third party subcontractors; records of this maintenance programme are maintained on site.

All operational areas are equipped with an impervious surface and areas where substances are used that may have an environmental impact (e.g. oils) are further protected with spill kits. The condition of surfacing is routinely inspected for signs of deterioration.

## **Point source emissions**

### Emissions to air

Throughout the process, appropriate controls, both manual and automated, are applied to ensure that emissions to air are minimised and, where appropriate, abated. Suitable controls are in place for the handling of raw materials, wastes and products such that the potential for emissions from these activities is minimised.

A range of abatement systems are employed throughout the process to remove particulate matter, such as dust filters (bag filters) and dust separation units (cyclones), as required, for the various stages of processing (grinding and cooling operations); and Local Exhaust Ventilation, where required. These methods are considered BAT for the sector.

Notwithstanding the controls outlined above, the H1 risk assessment submitted with the application concluded that the particulate emissions arising from the installation could not be deemed as insignificant. Based on the information submitted by the applicant, additional dispersion modelling was carried out by us.

We can conclude that the process contribution to ambient PM<sub>10</sub> concentrations at all relevant nearby receptors would screen out as insignificant (less than 1% and 10% for long term and short term predictions respectively) with respect to both the long term and short term air quality objectives. We are therefore satisfied that emissions of particulates from the process would not result in significant impacts at nearby receptor locations with respect to the long term and short term air quality objectives for PM<sub>10</sub>. On that basis, additional assessment from the applicant is not required.

### Emissions to sewer, surface water and groundwater

There are minimal discharges of water from the process. Emissions are generated from vehicle washing and boiler blowdown which are discharged to sewer via an off-site interceptor. Surface water run-off from the installation (rainwater run-off from the site buildings and yards) discharges via an interceptor to surface water drains which are routed to the industrial estate's surface water drainage system which runs to Gresty Brook.

There are no emissions from the site to groundwater.

## **Resource efficiency and waste management**

### Raw Materials

Raw materials are selected to meet the requirements of the end market. All the raw materials used in the product are approved for use under the Agriculture Feeding Stuffs Regulations 2000 and the Medicated Feeding Stuffs Regulations 2002.

As part of the EMS other raw materials consumed (such as process oils) are routinely reviewed, with the aim to improve process performance and to minimise potential environmental impact. The installation is part of a high-volume, low-margin industry where the minimisation of raw material is fundamental for productivity and profitability. Consequently, the process is designed to minimise process losses and waste generation. The installation product yield on raw materials consumed is close to 100% (based on dry mass).

#### Waste Handling

The installation generates and subsequently handles only small quantities of waste. As part of the management system these wastes are appropriately handled, segregated and stored on site according to type. The installation generates non-hazardous waste and very small quantities of hazardous waste, such as waste oils. The waste storage areas are appropriately designed and maintained. These areas have adequate capacity for the quantity of wastes generated.

#### Waste Recovery or Disposal

In order to maximise production yields, the installation recovers/reworks all out of specification work-in-progress. Appropriately licensed third parties are contracted to collect and dispose of and/or recover, off site, all of the sites waste. The operator has an ongoing programme to review potential opportunities to increase the recovery of usable materials from its waste streams.

#### Energy

The operator has a Climate Change Levy Agreement (CCA) in place for the installation. The operator is committed to the implementation of appropriate cost-effective energy efficiency measures and, as part of a trade body initiative, has implemented an energy efficiency plan and the site is accredited to ISO 50001.

## 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
<b>Receipt of submission</b>		
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.	✓
<b>Consultation</b>		
Scope of consultation	<p>The consultation requirements were identified and implemented. The decision was taken in accordance with our Public Participation Statement and our Working Together Agreements.</p> <p>For this application we consulted the following bodies:</p> <ul style="list-style-type: none"><li>• Cheshire East Council</li><li>• Health and Safety Executive</li><li>• Public Health England</li><li>• United Utilities</li></ul>	✓
Responses to consultation and web publicising	<p>The web publicising and consultation responses (Annex 2) were taken into account in the decision.</p> <p>The decision was taken in accordance with our guidance.</p>	✓
<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 our guidance on what a legal operator is.	✓
<b>European Directives</b>		
Applicable directives	All applicable European directives have been considered in the determination of the application.	✓

Aspect considered	Justification / Detail	Criteria met Yes
<b>The site</b>		
Extent of the site of the facility	<p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>	✓
Site condition report	<p>The operator has provided a description of the condition of the site.</p> <p>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).</p> <p>It is the operators intention to undertake a desktop systematic appraisal of risk of contamination of hazardous substances at the facility in order to meet the requirements of Article 16 and 22(2) of the Industrial Emissions Directive (IED). The contamination risk appraisal will enable the investigation works to be split into potentially three broad tiers:- Low Risk, Medium Risk and High Risk.</p> <p>The assessment of works undertaken and reporting of the baseline soil and groundwater conditions at the facility will be undertaken on a site specific basis; once the assessment of the site specific pollution possibility is known. The operator will, if necessary, undertake a quantitative assessment of identified hazardous substances at the site. If undertaken, the quantitative assessment will contain the information necessary to determine the current state (i.e. pre-commencement) of soil and/or groundwater contamination at the site, so that a quantified comparison with the site soil and groundwater can be undertaken upon eventual cessation of the site activities.</p>	✓



Aspect considered	Justification / Detail	Criteria met
		Yes
<p>Biodiversity, Heritage, Landscape and Nature Conservation</p>	<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>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>We have not formally consulted on the application. A Habitats Directive form for recording likely significant effect (Stage 2) has been completed and sent to Statutory Nature Conservation Body for information only. The decision was taken in accordance with our guidance.</p>	<p>✓</p>
<p><b>Environmental Risk Assessment and operating techniques</b></p>		
<p>Environmental risk</p>	<p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is unsatisfactory and required additional Environment Agency assessment to make up the shortfall. The conclusion of the assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment , all emissions may be categorised as environmentally insignificant. This is addressed in more detail in the Key Issues section above.</p>	<p>✓</p>
<p>Operating techniques</p>	<p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and Sector Guidance (TGN EPR 6.10).</p> <p>It has been demonstrated that the emissions from the installation (in particular, particulate matter as detailed in the Key Issues section of this document) are not significant. The Environment Agency agrees that the applicants proposed techniques are BAT for the sector.</p> <p>The application provides information on how the installation meets these requirements. This is explained in more detail in the Key Issues section of this document.</p>	<p>✓</p>

Aspect considered	Justification / Detail	Criteria met
		Yes
<b>The permit conditions</b>		
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 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>Whilst the emission of particulate matter has been identified as not being emitted in significant quantities, ELVs have been set in order to ensure protection of nearby receptors and to ensure compliance with the Benchmark levels identified in Process Guidance Note 6/26(13) and TGN EPR 6.10.</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>These monitoring requirements have been imposed in order to ensure the abatement on the coolers is effective.</p> <p>We made these decisions in accordance with Defra PGN 6/26(13) TGN EPR 6.10.</p> <p>Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>	✓
Reporting	<p>We have specified the reporting of monitoring, annual production and performance parameter data in the permit.</p> <p>We made these decisions in accordance with Defra PGN 6/26(13) and TGN EPR 6.10.</p>	✓

Aspect considered	Justification / Detail	Criteria met Yes
<b>Operator Competence</b>		
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.	✓
Relevant convictions	The Case Management System 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 responses

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 Cheshire West Council
Response received 02/06/16
Brief summary of issues raised
No issues raised – no objection or comments to make.
Summary of actions taken or show how this has been covered
No action necessary

Response received from Public Health England
Response received 16/06/16
Brief summary of issues raised
Recommendation that any environmental permit issued for this site should contain conditions to ensure that the following potential emissions do not impact upon public health: point source and fugitive emissions of particulate matter and odour emissions.
Summary of actions taken or show how this has been covered
These impacts are controlled by conditions in the permit and specific controls are detailed in the Key Issues section and Annex 1 above.

No responses were received from the following:

- Local community via web publication
- Health and Safety Executive
- United Utilities