Environment Agency permitting decisions

Bespoke permit

We have decided to grant the permit for 2 Sisters Food Group Limited Thetford operated by 2 Sisters Food Group Limited.

The permit number is EPR/BP3538WT.

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.

Description of the main features of the Installation

The Thetford facility is located off Caxton Way in Thetford, Norfolk at approximate National Grid Reference TL 85490 82318. The factory opened in November 2011. The site is set in an industrial estate on the south western edge of Thetford town, and is bound immediately on all sides by industrial premises. Thetford Forest is beyond the A11 to the west of the site, designated as part of Breckland Special Protection Area and Site of Special Scientific Interest. The centre of Thetford is approximately 1.5km northeast of the site.

This Environment Permit is for the following schedule 1 activity: *Section 6.8 Part A(1)(d)(i) Treatment and processing, other than exclusively packaging, of animal and vegetable raw materials (other than milk) with a finished product production capacity greater than 75 tonnes per day*.

The facility operates 7 days a week, 24 hours a day processing chicken products. A recent review of site production capacity estimated that the theoretical daily maximum is approximately 167.4 tonnes per day, taking it over the threshold required for an environmental permit.

Cut chicken is delivered to the site in refrigerated vans. The chicken is injected with brine (using de-nitrified water), and then processed via a number of production lines:

- Coated and fried chicken products (Lines A - G). The chicken is coated (either with crumbs or batter) and then fried via one of the seven fryer lines on site;
- Marinated chicken products (2 lines).

Ancillary operations on site include boiler plant, a Dissolved Air Flotation (DAF) effluent plant, ammonia refrigeration plant and liquid nitrogen cooling plant. The site operates one steam raising boiler (thermal output of 3.25 MWth) which is fired on natural gas. There are three gas fired thermal oil boilers to heat the fryers, each with a thermal output of 1.17 MWth.

There are no discharges directly to surface water from the site. All process effluent is pre-treated on site at the waste water treatment plant prior to

discharge to the public foul sewer under trade effluent discharge consent from Anglian Water. Between 200-500m³ per day of treated effluent is discharged to sewer. All surface water goes to soak away points on site. Roof runoff from the factory is discharged into a sustainability area; the overflow discharges to the public surface water system.

2 Sisters Food Group Limited have implemented an environmental management system (EMS) in line with the requirements of ISO 14001:2004. The EMS is subject to third party audits to ensure continued compliance to the standards requirements.

Key issues of the decision

Emissions

Emissions to Air

The site operates one steam raising boiler (thermal output of 3.25 MWth) which is fired on natural gas. There are also three gas fired oil boilers to heat the fryers, each with a thermal output of 1.17 MWth. The combined thermal capacity of the four combustion units is 6.76 MWth.

The Combustion Sector Guidance Note (SGN) EPR 1.01 identifies benchmarks for boilers of <100MW thermal input, but these are not generally applied to small boilers such as these. Due to this, and the results from H1 screening showing that the impacts of the operation of the combustion units are insignificant, the Environment Agency has determined not to set ELVs for emissions from the boiler (emission point A1) and thermal heaters (emission points and A2, A3, A4, A7, A8 and A9). This decision is in line with the approach taken at similar installations elsewhere in the UK.

The applicant has undertaken a H1 Risk Assessment screen that has quantified the cumulative impact of air emissions from the site. The applicant has assessed the installation's potential emissions to air against the relevant air quality standards, and the potential impact upon local conservation and habitat sites and human health.

The H1 assessment has demonstrated the air emissions from the gas fired boilers on site will not be significant. The process contributions for sulphur dioxide, nitrogen dioxide, carbon monoxide and particulates (PM10) will be well below the 1% Environmental Assessment Level (EAL) thresholds, and therefore screen out of requiring any further modelling.

There are no other emissions from the installation, thus no detailed assessment of the effect of the releases from the installation on Special Areas of Conservation, Special Protection Areas and Ramsar sites is required. An Appendix 11 Form for recording likely significant effect (Stage 2) was completed and sent to Natural England for information.

The same criteria can be applied to SSSI's and non statutory sites therefore no further assessment of air emissions is required for conservation sites. An Appendix 4 was completed and saved to our Electronic Document and Records Management system (EDRM) for information only.

Emissions to Sewer

The site's wastewater is discharged to foul sewer as either domestic sewerage or as trade effluent. Process wastewater is discharged under the terms of a trade effluent consent issued by Anglian Water (consent reference ADY 320, dated December 2013), a copy of which was submitted with the application.

Catchment pots are fitted to the process drains inside the factory. The effluent is then treated via the on-site effluent treatment plant (ETP) prior to discharge to sewer (Emission Point S1). The ETP comprises:

- Macerator (fitted with high level sensors) – coarse screenings are disposed of as waste;
- Two screen filters – screenings are disposed of as waste;
- Balance and separator tanks – primary sludge is disposed of as waste;
- Dissolved Air Flocculation (DAF) unit – secondary sludge disposed of as waste.

All coarse screenings, primary and secondary sludge is disposed of as waste. The effluent treatment plant uses dissolved air flotation technology to pre-treat process effluent. Coagulant (ferric sulphate) and flocculant dosing are used to flocculate the suspended solids.

The discharge consents impose limits on temperature, pH, suspended solids, chemical oxygen demand (COD), sulphate, fats oil and grease (FOG) and chloride. We have considered the types of raw materials and chemicals that the operator has listed as being used at the installation and which have the potential to be contain *Hazardous Pollutants* as listed in our H1 Annex D guidance. We are satisfied that the release of any such substances, for example, mercury in the caustic soda used for cleaning purposes, will be appropriately controlled via the conditions of the water company trade effluent consent.

The emissions plan and Table S3.2 Point source emissions to sewer, effluent treatment plant reflect the site situation.

There are three drainage systems in place on the site; surface, foul, and effluent treatment plant drainage. These are clearly marked on the revised site drainage plan (reference: *2Sis EPR PartB2 Section5a II site drainage V2*).

All internal production areas, the energy centre, and high risk external areas, such as the waste handling area, are connected to the effluent treatment plant. Surface water drains serve the remaining external areas of the site. Foul drains serve the outflow for the effluent treatment plant and office areas. Prior to being fed into the effluent treatment plant the process effluent is directed to a below ground storage sump.

All clean surface and roof water is separated from process related effluent.

Despite fitting catchment pots on factory drains the site is aware that coarse solids are still being discharged to drain. This can cause the pumps to become blocked and fail. The site is addressing this issue through training. To prevent this from happening in the future the site are looking to install a primary screening system for factory wastewater. The site is also costing for an oil interceptor for surface runoff water. These have been addressed by the inclusion of Improvement Conditions (IC1) in the permit:

IC1 - The Operator shall submit a written report to the Environment Agency on the feasibility of installing primary effluent treatment, which shall include, but not be limited to a review of treatment options available along with their associated benefits.

A review of primary effluent treatment options will be completed by the operator within 6 months of permit issue.

Site Condition Report

A Site Condition Report (SCR) has been submitted as part of the application. There are no records of pollution incidents at the site since it was commissioned and a non intrusive investigation confirmed there was no visual evidence of pollution incidents identified. In addition, there are no contaminated land register entries or notices recorded within the immediate vicinity of the site.

There are no anticipated emissions to ground, surface water or groundwater. All surface water runoff and process effluent is designed to discharge to sewer. There are catchment pots fitted to the process drains inside the factory. The majority of the site, excluding areas occupied by buildings, is either laid to concrete or tarmacadam. The hard standing will prevent the downwards migration of any substance.

The majority of chemicals on site are stored in a self bunded, locked metal unit in the north western section of the site. The metal structure situated on tarmacadam and is locked at all times, unless in use. The unit stores various sized chemical drums, including Intermediate Bulk Containers. Chemical containers are also located within the effluent treatment plant bund located in the North Western section of the site.

Bunding and containment around the oil storage tanks does not currently meet CIRIA guidelines as it cannot currently contain 25% of the total capacity of oil tank contents. The Operator has stated they are looking at increasing the current bund size when they do improvements later in the year, and this will also include a review of the drains nearby. This has been incorporated into the permit as an improvement condition (IC2):

The Operator shall implement measures to improve the storage and bunding of the oil stores on site such that any spillage is contained and may be fully recovered in line with current guidance. A written report summarising the findings shall be submitted to the Environment Agency. This should also include a timescale for implementation of any improvements agreed with the Environment Agency.

Oil is stored in an impervious concrete bunded area at the front of the energy centre building which is located in front of the factory building. Fresh oil is stored in a storage tank (silo) with capacity for 28 m^3. This is fitted with a top level alarm. The delivery point is outside the concrete bund, over a trip tray (0.5 m^3 capacity). Waste oil is stored in a 13m^3 capacity tank. An improvement condition (IC3) has been included in the permit to review the protection measures of surface water from fugitive emissions:

The Operator shall review the provision of protection of surface water drains from fugitive emissions throughout the installation, and in particular in areas of

oil storage. A written report shall be provided to the Agency detailing any deficiencies identified, the improvements proposed and the time scale for implementation.

In addition, the site are undertaking a feasibility study for the installation of an oil interceptor on site to protect surface water features. This has been incorporated in the permit as IC4:

The Operator shall review the provision of an oil interceptor on site to protect surface water drains in particular in the car park area and areas of oil storage. A written report shall be provided to the Agency detailing any deficiencies identified, the improvements proposed and the time scale for implementation.

Spill kits are strategically placed around the site and will be utilised in the event of a spillage onsite, in accordance with the site spill response procedures. Spill kits are checked regularly to ensure that they are correctly stocked. All relevant operatives have received spill response training.

We are satisfied that the site description and baseline data represents an accurate description to that found on site.

Taking these points into consideration and the low likelihood that land pollution will occur during the future operation of the site it is not considered that intrusive sampling is necessary for a baseline to be established.

Odour

The site has developed an Odour Management Plan (OMP) as part of the permit application (document reference: *Odour Management Plan, 2 Sisters Food Group (Thetford). 2Sis-EPR-Part B-Section 3b-ii. 29th October 2015*). The OMP identifies the risks, detailed controls in place to manage odours and identifies the measures to be used in the event of odour being detected.

The following areas of site are highlighted as being potentially odorous and control measures for each source:

Odour Source	**Mitigation control measure**
Receipt of raw materials	Very localised odours from raw material delivery. Raw materials arrive refrigerated and are directly taken into the enclosed building. Area cleaned regularly.
Food oil delivery	Localised odour only if there is a leak. Oil delivery procedure in place and product bulk pumped directly into silos fitted with alarms. Spill kits located adjacent to delivery area.
Frying – continuous on site	Internal EMS audits include odour checks. Staff report non conformances relating to odour. The site has recently purchased two new Jimco extractor fan

	units to replace the existing unit. The Jimco unit is fitted with a CIP system, which is used every night to remove carbon deposition and extends the life of the UV tube. All fryer flues have been replaced with improved flow. In addition to regular servicing requirements Jimco units are serviced after an odour complaint.
Effluent Treatment Plant (ETP) – runs continuously	Aeration of effluent is optimised to ensure adequate solids capture. Regular desludging of the DAF tank to remove solids and regular ETP sludge collections. Correct flocculation and coagulation chemistry to ensure adequate solids capture.
Waste handling	Designated waste handling areas onsite. All food waste is segregated and stored in separate sealed containers. General waste is stored in a sealed compactor. All receptacles are regularly emptied. Dedicated waste area operatives are responsible for overseeing waste handling across the site.
Ammonia Plant	An ammonia Emergency Procedure has been developed in case of an ammonia leak. The Ammonia plant rooms are effectively sealed from production areas (Energy Centre 1 and 3). There are gas-monitoring units in the energy centres and above the spiral chiller in the roof voids; wall extraction units; audible alarms; and flashing lights. A gas monitor controls all of these automatically. These are tested and logged monthly, a copy of the log is kept. In the event that a leak or fault is detected by the detection system the plant is designed to automatically shut down.

A Jimco FLO-P air cleaning unit is used to clean the grease-loaded exhaust system of the thermal oil fryer on Lines A & D, to eliminate odour and organic content. The system uses ozone exhaust air technology to reduce organic and odour-carrying particles by photolytic oxidation into carbon dioxide and water vapour, without the need for high temperatures. The Jimco unit is fitted with a Clean In Place system, which is used every night to remove carbon deposition and extend the life of the UV tube.

The site received three odour complaints in 2014. These were dealt with by servicing the Jimco extraction units. The site has recently purchased two new Jimco units to replace the existing unit. All fryer flues were also replaced with improved flow to prevent odour build up. No odour complaint has been received since August 2014.

The site has developed a non-conformance procedure (EMS Procedure 4.5.3) to establish and maintain a system for handling any environmental complaints. The HSE Manager shall investigate any non-conformances and identify the root cause and the need for Corrective and Preventive action,

relating to the environmental system. A summary of the Environmental Corrective and Preventive Action Reports raised during the year shall be reviewed at the Annual Environmental Management Meeting.

In addition, a comprehensive internal audit procedure (EMS Procedure 4.5.5) has been developed for the site to establish and maintain a system for verifying the effectiveness and implementation of the sites Environmental Management System; and ensure that the environmental impacts associated with the site are controlled. Key areas audited on site include:

- Emergency preparedness (including spill response);
- Waste management (storage on site and duty of care audit trails);
- Site drainage;
- Refrigeration;
- Environmental aspects (environmental risks);
- Legal compliance;
- Organic oil delivery and waste organic oil storage;
- Bund integrity; and
- Odour abatement

We are satisfied that the OMP is sufficient to minimise the potential for odour emissions from the facility to cause nuisance outside the installation boundary. The Operator is required to operate at all times in accordance with the site OMP to prevent pollution arising from odours and implement all mitigation measures in line with the plan.

We, have reviewed and approved the Odour Management Plan and consider it complies with the requirements of our H4 Odour management guidance note. We agree with the scope and suitability of key measures but this should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and sufficient. That remains the responsibility of the operator.

Noise

The processing plant is fully enclosed within the main building. The processes at the installation are not considered to represent a risk of noise or vibration.

The site confirmed they received two noise complaints in 2014. The first one related to the noise from the Jimco extraction fan and was resolved by serving the unit. The second was from noise from the ammonia plant room caused by a slipping belt that was replaced immediately.

The site has developed a non-conformance procedure (EMS Procedure 4.5.3) to establish and maintain a system for handling any environmental complaints (see odour section above). The Area team have confirmed they expect the risk of noise complaints from the site as being low.

We are satisfied the site poses a low risk of exposure to the local community, as per the risk assessment included in the application. Once permitted, if the site receives substantiated noise complaints Condition 3.4 will require the operator to produce and implement a comprehensive noise management plan.

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 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 Regulatory Guidance Note (RGN) 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements. For this application we consulted the following bodies: • Director of Public Health – Norfolk County Council • Environmental Health department, Breckland District Council • Planning Department, Breckland District Council • Health and Safety Executive (HSE) • Public Health England (PHE)	✓
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 Environmental Permitting Regulations (EPR) RGN 1 Understanding the meaning of operator.	✓
European Directives		
Applicable	All applicable European directives have been considered	✓

Aspect considered	Justification / Detail	Criteria met Yes
directives	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 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). **See Key Issues 'Site Condition Report' for further information.**	✓
Biodiversity, Heritage, Landscape and Nature Conservation	The application is within 10km of Breckland Special Area of Conservation (SAC) and Special Protection Area (SPA). The application is within 2km of 6 Sites of Special Scientific Interest (SSSI): Barnhamcross Common; Breckland Farmland; Breckland Forest; Elm Road Field, Thetford; Thetford Golf Course and Marsh; and Thetford Heath SSSI's. A full assessment of the application and its potential to affect the sites species and habitat has been carried out as part of the permitting process. We consider that the application will not affect the features of the site. The H1 risk assessment for the site demonstrates that there is No Likely Significant Effect on the SAC/SPA; and no likely damage to interest features of any SSSIs within the screening distance. An Appendix 11 Form for recording likely significant effect was completed and sent to Natural England for information only. An Appendix 4 has been saved to EDRM. **Further details are given in the Key Issues Air**	✓

Aspect considered	Justification / Detail	Criteria met Yes
	Emissions section.	
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. The assessment shows that, applying the conservative criteria in our guidance on Environmental Risk Assessment, all emissions may be categorised as environmentally insignificant. **See Key Issues section for further details.**	✓
Operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes. We have reviewed the techniques used by the operator and compared these with the relevant guidance notes - How to comply with your environmental permit and additional guidance for the food and drink sector (EPR 6.10). Key operational techniques proposed by the operator include: • Use of high efficiency natural gas fired boilers. • Steam boiler exhaust fitted with flue gas economiser to recover heat. • The thermal boiler consists of a vertical heater with very high total efficiency with flame reversal combustion chamber and three gas passes. The double combustion air preheating provides high thermal efficiency of up to 92%. • Catchment pots are fitted within production areas to reduce solids going for effluent treatment. • The site operates a zero waste to landfill policy. • The site has a Climate Change Agreement. • Routine preventative maintenance and monitoring checks. • An environment accident preventative procedure has been developed as part of the site EMS. This includes fire, ammonia emergency and chemical spills procedures. • Solar panels cover approximately half of the factory roof area and provide around 5% of site's	✓

Aspect considered	Justification / Detail	Criteria met Yes
	electricity. 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, of the installation concerned.	
The permit conditions		
Raw materials	We have specified limits and controls on the use of raw materials and fuels.	✓
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.	✓
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: • appropriate measures are in place to ensure that there is a review of the primary effluent treatment on site. • appropriate measures are in place to ensure that there is a review of the bunding and containment on site. • appropriate measures are in place to ensure that there is a of protection of surface water drains from fugitive emissions throughout the installation, and in particular in areas of oil storage. Further details are given in the Key Issues section.	✓
Emission limits	We have decided that emission limits should be not set in the permit. **Further details are given in the Key Issues Air Emissions section.**	✓

Aspect considered	Justification / Detail	Criteria met Yes
Reporting	We have specified reporting in the permit. Annual reporting is required for annual production, energy usage and water. We made these decisions in accordance with SGN EPR 6.10 for the Food and Drink sector.	✓
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	The National Enforcement Database has been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in RGN 5 on Operator Competence.	✓
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: External Consultation and web publicising advertising responses

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

Response received from
Environmental Health department, Breckland Council – 2nd December 2015
Brief summary of issues raised
There have been odour and noise complaints allegedly originating from 2 Sisters, Caxton Way, Thetford since April 2011. The odour complaints have included descriptions ranging from smell of burnt oil to smell of chicken cooking and involved residents in MacKenzie Road and nearby residential estates and also across the London Road on the Barnham Cross Estate. All the complaints were resolved through informal means. Once the company was aware of the complaint action was taken e.g. cleaning of the arrestment system etc. More odour control equipment was installed in this period. At the time of the complaints officers visited the areas concerned and sometimes experienced the cooking smell. At the time of the visits the odour was not found to be a Statutory Nuisance. The smell was experienced also on the nearby retail park on London Road (near Sainsbury's). Overall there were 7 complaints involving 11 complainants. When the company was made aware of complaints we found them to be responsive and positive. There were 2 noise complaints in that time involving 4 complainants. The noise complained of included noise from fans and a "whirring" noise and the complainants were located in the MacKenzie Road/St Johns Way estate area. Again when the company was aware of the complaints they responded positively and made changes which solved the complaint at the time and attempted to prevent recurrence. Again the noise was not found to be a statutory nuisance although the company was contacted regarding noise complaints. 2 Sisters encourage the complainants to contact them direct at anytime and the complainants who did this reported varying satisfaction with this process. I understand they attended meetings with residents and formed an informal liaison group. No complaints have been made to us this year. Our last complaint was closed in March 2015.
Summary of actions taken or show how this has been covered
The Environment Agency notes the concerns with regards to noise and odour emissions. Likely impacts have been assessed during the determination as unlikely to have a significant impact and therefore we have included standard conditions which require the operator to action any emissions management plan should a substantiated negative impact be notified. The management plan may then require monitoring to be implemented.

Conditions 3.3, and 3.4, concerning odour and noise are included in the permit.

The operator has provided an odour management plan for the site that we have assessed with reference to our H4 odour guidance (see above odour section for more details).

With regards to noise, we are satisfied the site poses a low risk of exposure to the local community, as per the risk assessment included in the application. Once permitted, if the site receives substantiated noise complaints Condition 3.4 will require the operator to produce and implement a comprehensive noise management plan.

Response received from
Public Health England (PHE) – 2nd December 2015
Brief summary of issues raised
1. We recommend that any Environmental Permit issued for this site should contain conditions to ensure that the following potential emissions do not impact upon public health: • Emissions to air including gaseous compounds, volatile organic compounds (VOCs) and particulate matter; • Odour emissions; • Emissions to water; and • Litter and pests. 2. Furthermore the Environment Agency (EA) may wish to consider whether the thermal output of the A1 boiler provided is correct as it has been inconsistently reported in the application documents. 3. The EA may also wish to ensure that there is an Accident Management Plan in place and this has adequately considered the potential for fire. 4. Based solely on the information contained in the application provided, PHE has no significant concerns regarding risk to health of the local population from this proposed activity, providing that the applicant takes all appropriate measures to prevent or control pollution, in accordance with the relevant sector technical guidance or industry best practice. 5. In relation to potential risk to public health, we recommend that the EA also consult the following relevant organisation(s) in relation to their areas of expertise: • the local authority for matters relating to impact upon human health of contaminated land; noise, odour, dust and other nuisance emissions; • the Food Standards Agency, where there is the potential for deposition on land used for the growing of food crops or animal rearing; and • the Director of Public Health for matters relating to wider public health impacts.
Summary of actions taken or show how this has been covered
1. We have carried out a full assessment of the operators H1 screening and can conclude there will be no adverse effect from the gas fired boiler air emissions from the site. Standard Conditions 3.1, 3.2, 3.3,

3.4 and 3.5 concerning emissions to air, water, land, fugitive emissions, odour, noise and pests are included in the permit.
2. The boiler emissions were clarified in a Schedule 5 response from the site. These emissions were screened using our air quality screening tool (see Key Issues above for more information).
3. An environment accident preventative procedure has been developed as part of the site Environmental Management System. This includes fire, ammonia emergency and chemical spills procedures.
4. We have reviewed the techniques used by the operator and are satisfied they meet the requirements of the relevant guidance notes - How to comply with your environmental permit and additional guidance for the food and drink sector (EPR 6.10).
5. The Local Authority and Director of Public Health were consulted as part of this application. The Food Standards Agency were not consulted as part of our working together agreement as the site was deemed to be low risk.

This proposal was also publicised on the Environment Agency's website between 06/11/2015 and 04/12/2015, but no representations were received during this period.
In addition the following consultees were contacted however no response was received:

- Director of Public Health – Norfolk County Council
- Planning Department, Breckland District Council
- Health and Safety Executive (HSE)