



# Permit with introductory note

## The Environmental Permitting (England & Wales) Regulations 2016

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Gilbertson & Page Limited

Brownfields Pet Food Factory  
44-55 Brownfields  
Welwyn Garden City  
Hertfordshire  
AL7 1AN

### **Permit number**

**EPR/YP3135YD**

# Brownfields Pet Food Factory

## Permit number EPR/YP3135YD

### Introductory note

#### **This introductory note does not form a part of the permit**

The main features of the permit are as follows:

The Installation is located in an industrial and commercial area of Welwyn Garden City at national grid reference TL 24862 13117. The Installation currently operates under a Part B permit (not subject to regulation by the Environment Agency). However, due to increased production throughput, an Installations permit (EPR, Part A(1) and regulated by the Environment Agency) is now required. This permit will authorise the treatment and processing of animal and vegetable raw materials (other than milk only) intended for the production of food or feed, both in combined and separate products, with a finished product production capacity greater than 75 tonnes per day (covered in Section 6.8 Part A(1)(d)(iii)(aa), in Part 2 to Schedule 1 of the Environmental Permitting Regulations 2016).

The Installation manufactures animal feeds based upon core formulations of wheat, rice, maize and meat meal. Other specific additives include vitamins and mineral supplements. The key stages of the processing are batching, mixing, grinding, conditioning (steam treatment), extrusion (cooking), drying, cooling and coating.

The required feed materials, additives and minerals are batched to the required individual recipe and mixed. The mixture is then transferred to a grinder for reduction to a uniform size. Following grinding, the mix is transferred by conveyor to the extrusion area where it is first conditioned by adding moisture. The steam used for this process is provided by a natural gas fired boiler (thermal input of 2.49 MW).

After conditioning, the mix is extruded through die plates to produce pellets of the required shape. The pellets are dried in four natural gas-fired ovens (each of a thermal input of 1.5 MW) and cooled on a conveyor using ambient air. Following cooling, the pellets are coated in chicken fat and digest and blown across the factory via pipework to the bagging area. The finished product is then bagged via weigh pans, heat-sealed and moved to the storage area prior to despatch off-site to customers.

The emissions from the Installation are releases to air from the boiler (emission point A1), odour and particulate matter from the mixing, drying and extrusion process (emission point A2), batching process (emission point A3), grinding process (emission point A4) and dries storage vacuum (emission point A5). Abatement of particulate matter is undertaken via reverse jet filter and cyclones. These emissions have been screened out as insignificant for both human and ecological receptors. Odorous emissions from the mixing, drying and extrusion processes are treated via an existing ultraviolet and ozone injection system.

Uncontaminated surface water from roofs and site surface water is discharged to a surface water drain. Process effluent and domestic effluent are discharged to foul sewer operated by Thames Water plc.

All plant and process areas are on hardstanding. All tanks containing liquids, whose emissions to water or land could cause pollution are contained in adequate bunding and sized to contain 110% of the contents of the largest tank or 25% of the total tankage within a bund, whichever is the greater. Materials used for surfacing of process areas and bunds are resistant to the materials they may come into contact with.

Wormley-Hoddesdonpark Woods Special Area of Conservation (SAC) is located 9.3 km from the Installation. There are two Sites of Special Scientific Interest (SSSI) and twenty non-statutory sites (local wildlife sites and ancient woodland) located within 2 km of the Installation. Assessment by the Environment Agency shows that emissions from activities undertaken at the Installation are unlikely to have a significant impact on the habitat sites.

There is a Climate Change Levy Agreement (CCLA) in place for this Installation.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/YP3135YD/A001	Duly made 28/09/17	Application for a dry pet food manufacturing plant.
Additional information received	10/11/17	Part response to Schedule 5 notice dated 20/10/17.
Additional information received	27/11/17	Response to queries regarding emissions to sewer, secondary containment, point source emissions to air and silos.
Additional information received	10/01/18	Response to queries regarding site drainage system, dryers (ovens), annual operating hours and particulate monitoring systems.
Additional information received	31/01/18	Final response to Schedule 5 notice dated 20/10/17 – site EMS and revised site plan.
Permit determined (Billing ref: YP3135YD)	12/02/18	Permit issued to Gilbertson & Page Limited.

End of introductory note

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

EPR/YP3135YD

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

**Gilbertson & Page Limited** (“the operator”),

whose registered office is

**45/55 Brownfields  
Welwyn Garden City  
Hertfordshire  
AL7 1AN**

company registration number 00055762

to operate an installation at

**Brownfields Pet Food Factory  
44-55 Brownfields  
Welwyn Garden City  
Hertfordshire  
AL7 1AN**

to the extent authorised by and subject to the conditions of this permit.

Name	Date
Mike Jenkins	12/02/2018

Authorised on behalf of the Environment Agency

# Conditions

## 1 Management

### 1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

### 1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

### 1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

### 1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

## **2 Operations**

### **2.1 Permitted activities**

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

### **2.2 The site**

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

### **2.4 Pre-operational conditions**

2.4.1 The activities shall not be brought into operation until the measures specified in schedule 1 table S1.3 have been completed.

## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.

3.1.2 The limits given in schedule 3 shall not be exceeded.

- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

## **3.2 Emissions of substances not controlled by emission limits**

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
  - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

## **3.3 Odour**

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
  - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.4 Noise and vibration**

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
  - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.5 Pests**

- 3.5.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.5.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
  - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **3.6 Monitoring**

- 3.6.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
- (a) point source emissions specified in tables S3.1 and S3.2; and
  - (b) process monitoring specified in table S3.3.
- 3.6.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.6.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.6.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.6.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

# **4 Information**

## **4.1 Records**

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.



## 4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
  - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
  - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter.

## 4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform the Environment Agency,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

- 4.3.2 Any information provided under condition 4.3.1 (a)(i), or 4.3.1 (b)(i) where the information relates to the breach of a limit specified in the permit, shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
  - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
  - (b) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (a) the death of any of the named operators (where the operator consists of more than one named individual);
  - (b) any change in the operator's name(s) or address(es); and
  - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
  - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## 4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

# Schedule 1 – Operations

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity and WFD Annex I and II operations</b>	<b>Limits of specified activity and waste types</b>
AR1	S6.8 A(1)(d)(iii)(aa) Treatment and processing of animal and vegetable raw materials (other than milk only) intended for the production of food or feed, both in combined and separate products, with a finished product production capacity greater than 75 tonnes per day.	Manufacture of dry pet food.	From receipt of raw materials to despatch of finished product.
<b>Directly Associated Activity</b>			
AR2	Steam and electrical power supply	Production of steam for the manufacturing process via a natural gas fired boiler (2.49 MWth).  Production of hot air for the drying process via four natural gas-fired ovens (6 MWth aggregated)	From the receipt of fuel to combustion with the release of combustion gases.
AR3	Raw material storage	Storage of raw materials including ingredients, lubricants etc.	From the receipt of raw materials to despatch for use within the facility.
AR4	Waste handling and storage	Storage and handling of waste produced on site	From the generation of waste to despatch from site.
AR5	Operation of abatement systems	Collection and treatment of air from the buildings prior to release to atmosphere.	From the collection of air from site processes to treatment and release of treated air to atmosphere.

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application EPR/YP3135YD/A001	Application Supporting Report document in response to section 3a – technical standards, Part B of the application form.	05/07/17
Additional information	Information relating to size and emissions profile of boiler.	28/09/17
Response to Schedule 5 Notice dated 20/10/17	Response to questions detailing operating techniques, emissions to sewer, site surfaces and maintenance, secondary containment, management of fugitive emissions and odour management.	10/11/17
Additional information	Response to questions detailing emissions to sewer, secondary containment, point source emissions to air and silos.	27/11/17
Additional information	Response to questions regarding site drainage system, dryers (ovens), annual operating hours and particulate monitoring systems.	10/01/18

<b>Table S1.3 Pre-operational measures</b>	
<b>Reference</b>	<b>Pre-operational measures</b>
1	Prior to the commencement of activities specified in Table S1.1, the operator shall undertake emissions monitoring to MCerts Standard to identify the emissions (including speciation) and the concentration ranges under both normal operations, including but not limited to start-up and shut-down of process batches, and worst case scenario operational loads from emission points A1 to A5. The monitoring shall take into account pollutants released from the start of the process (batching) to the packaging of the finished product (including combustion emissions from the drying process). A report shall be submitted to the Environment Agency detailing the emissions monitoring undertaken and the findings of the emissions monitoring.
2	Prior to the commencement of activities specified in Table S1.1, the operator shall submit a commissioning plan for the installation of the proposed odour abatement system (including air extraction). The plan shall be designed to demonstrate that permit conditions will be met under all anticipated operating conditions and the site odour emissions will not extend beyond the site. The operator shall also confirm the commissioning programme, details of odour abatement plant monitoring protocols and a proposal for the assessment of the performance of the abatement system against design parameters.
3	Prior to the commencement of activities specified in Table S1.1, the operator shall identify and install abatement to treat odour emissions from the start of the process (batching) to the packaging of the finished product. The installation and the commissioning of the approved odour abatement system shall be implemented by the operator, subject to any such amendments or additions as notified by the Environment Agency.
4	Prior to the commencement of activities specified in Table S1.1, the operator shall develop a revised odour management plan for the activities undertaken at the Installation. The plan shall take into account the appropriate measures for odour control specified in the Part B Process Guidance Note 6/26/13 dated December 2013. The plan shall also include all the required information as specified in the Environment Agency Horizontal Guidance H4 - Odour Management. The plan shall: <ul style="list-style-type: none"> <li>• Include the management of odorous emissions from the start of the process (batching) to the packaging of the finished product, following the completion of emissions monitoring undertaken in POC1, and the identification of required process changes including emissions abatement system (POC3).</li> </ul>

<b>Table S1.3 Pre-operational measures</b>	
<b>Reference</b>	<b>Pre-operational measures</b>
	<ul style="list-style-type: none"> <li>• address all points raised in the Environment Agency’s review of the odour management plan</li> <li>• identify all odorous emissions and activities, under normal and abnormal operations</li> <li>• detail control measures in place for each emission /activity (under normal and abnormal operations)</li> <li>• identify process monitoring required for each emission and trigger levels for action to be taken</li> </ul> <p>The updated odour management plan shall be submitted to the Environment Agency for review and comment.</p> <p>The operator shall amend the odour management plan in accordance with the Environment Agency’s comments prior to final approval.</p>
5	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a written /documented preventative-based overarching maintenance management system for plant, including conditional maintenance (if applicable) of equipment and site infrastructure whose failure could impact on the environment.</p> <p>The overarching maintenance management system report shall identify:</p> <ul style="list-style-type: none"> <li>• roles and responsibilities;</li> <li>• a system to generate documented maintenance instructions for each job/task;</li> <li>• a review system to: <ul style="list-style-type: none"> <li>○ track the progress of maintenance jobs;</li> <li>○ review maintenance tasks frequencies following on-site accidents, incidents, near misses, and notifications from plant /equipment suppliers;</li> </ul> </li> <li>• a documented system which identifies critical plant/equipment/items, whose failure could impact on the environment, including details of where critical spares can be found on site, and, or sourced within a short timeframe.</li> </ul> <p>A report detailing the overarching maintenance management system shall be submitted to the Environment Agency for review and comment.</p> <p>The operator shall amend the maintenance management system in accordance with the Environment Agency’s comments prior to final approval.</p>
6	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a training management system, which identifies the training needs, for all staff and personnel, including third party contractors, working at the Installation, relevant to their job role.</p> <p>The training management system report shall identify training requirements for each person/job function, including:</p> <ul style="list-style-type: none"> <li>• refresher training;</li> <li>• access to written/documentated operational instructions relevant to their roles within the permitted installation activities;</li> <li>• a documented system to maintain a record of the skills and training requirements for all staff whose activities/jobs in relation to the permitted Installation may have an impact on the environment and shall keep records of all relevant training</li> </ul> <p>Details of the overarching training management system report shall be submitted to the Environment Agency for review and comment.</p> <p>The operator shall amend the training management system in accordance with the Environment Agency’s comments prior to final approval.</p>
7	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop an accident management plan which identifies accidents /incidents which could have an impact on the environment.</p> <p>The accident management plan shall describe how scenarios including but not limited to events such as fire, explosions, spills/leak are identified and managed to minimise the environmental impact. The plan shall also detail the measures in place to minimise the scenario from occurring.</p>

<b>Table S1.3 Pre-operational measures</b>	
<b>Reference</b>	<b>Pre-operational measures</b>
	<p>A report on the accident management plan, covering the points above shall be submitted to the Environment Agency for review and comment.</p> <p>The operator shall amend the accident management plan in accordance with the Environment Agency's comments prior to final approval.</p>
8	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a document management system and documented written procedures for all the permitted installation activities which covers:</p> <ul style="list-style-type: none"> <li>• normal operational conditions;</li> <li>• abnormal operating conditions;</li> <li>• investigating and reporting actual or potential non-compliance with operating procedures whose failure could lead to an impact on the environment;</li> <li>• investigating abnormal operating conditions, including any malfunction, breakdown of plant, equipment or technique, down time, and short term or long term remedial measures and near misses, and prompt implementation of required actions, and the maintenance of detailed records of all actions and investigations; and</li> <li>• a documented system to record and investigate environmental complaints relating to the permitted installation activities, or alleged environmental effects on the environment, detailing the date, nature and source of the complaint, a summary of the review and investigation and actions taken, including any review and changes of the site management systems.</li> </ul> <p>The operator shall submit a report on the management system developed to manage the above document procedures, including when procedures will be reviewed and updated. The report shall be submitted to the Environment Agency for review and comment.</p> <p>The operator shall amend the document management system in accordance with the Environment Agency's comments prior to final approval.</p>
9	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall undertake a survey to determine the integrity, adequacy and suitability of existing site hardstanding, kerbing and secondary containment for above-ground tanks and the measures to comply with the requirements of the Food and Drink Technical Guidance Note (EPR 6.10), CIRIA 736 and any other relevant industry standard.</p> <p>The survey shall assess the adequacy of the design, construction and condition of existing site hardstanding, kerbing and secondary containment for above-ground tanks with the purpose of preventing fugitive emissions to surface water, ground water and land.</p> <p>A written report summarising the survey, proposals for improvements and a timescale for implementation of any improvements shall be submitted to the Environment Agency for review and comment.</p> <p>The operator shall implement any improvements in accordance with the Environment Agency's comments.</p>

## Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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## Schedule 3 – Emissions and monitoring

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A1 [Point A1 on site plan in Schedule 7]	Boiler stack	No parameter set	No limit set	--	--	--
A2 [Point A2 on site plan in schedule 7]	Process stack <sup>Note 1</sup>	Particulate matter	50 mg/m <sup>3</sup>	Hourly average	Continuous measurement	BS EN 13284-1
A3 [Point A3 on site plan in schedule 7]	Dust suppression unit stack <sup>Note 1</sup>	Particulate matter	50 mg/m <sup>3</sup>	Hourly average	Continuous measurement	BS EN 13284-1
A4 [Point A4 on site plan in schedule 7]	Grinder exhaust stack <sup>Note 1</sup>	Particulate matter	50 mg/m <sup>3</sup>	Hourly average	Continuous measurement	BS EN 13284-1
A5 [Point A5 on site plan in schedule 7]	Dries storage vacuum <sup>Note 1</sup>	Particulate matter	50 mg/m <sup>3</sup>	Hourly average	Continuous measurement	BS EN 13284-1
Vents	Digest and Oil tanks	No parameter set	No limit set	--	--	--

Note 1 – Emission parameters, limits and monitoring requirements will be subject to review by the Environment Agency following the completion of pre-operational condition 1 (Table S1.3).

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1 on site drainage plan – Drawing 3, 1776485 0501-ASR-0003, Rev B	Process effluent and domestic effluent	No parameter set	No limit set	--	--	--
Surface water outlet 1 on site drainage plan – Drawing 3, 1776485 0501-ASR-0003, Rev B	Uncontaminated site surface water	No parameter set	No limit set	--	--	--
Surface water outlet 2 on site drainage plan – Drawing 3, 1776485 0501-ASR-0003, Rev B						



<b>Table S3.3 Process monitoring requirements</b>				
<b>Emission point reference or source or description of point of measurement</b>	<b>Parameter</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>	<b>Other specifications</b>
Main building, storage tanks, silos, odour abatement plant	Odour	Daily	Olfactory monitoring	Odour detection at the site boundary.
Storage tanks and silos	Integrity checks	Weekly	Visual assessment	--
Secondary containment	Integrity checks	Monthly	Visual assessment	--
Odour abatement system	Key process parameters as agreed in writing by the Environment Agency	In accordance with manufacturer's recommendations.	None specified	Odour abatement system shall be regularly checked and maintained to ensure optimum treatment efficiency as agreed in writing with the Environment Agency.

## Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Emissions to air Parameters as required by condition 3.6.1.	A2, A3, A4, A5	Every 12 months	1 January

<b>Table S4.2 Annual production/treatment</b>	
<b>Parameter</b>	<b>Units</b>
Dry animal feed (finished product)	tonnes

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Raw material usage	Annually	tonnes or m <sup>3</sup>
Boiler usage	Annually	hours
Waste disposed and/or recovered	Annually	tonnes

<b>Table S4.4 Reporting forms</b>		
<b>Media/parameter</b>	<b>Reporting format</b>	<b>Date of form</b>
Air	Form air 1 or other form as agreed in writing by the Environment Agency	12/02/18
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	12/02/18
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	12/02/18
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	12/02/18

## Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

### Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

<b>(b) Notification requirements for the breach of a limit</b>	
<b>To be notified within 24 hours of detection unless otherwise specified below</b>	
Measures taken, or intended to be taken, to stop the emission	

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>I Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“building” means a construction that has the objective of providing sheltering cover and minimising emissions of noise, particulate matter, odour and litter.

“disposal”. Means any of the operations provided for in Annex I to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“emissions to land” includes emissions to groundwater.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“impermeable surface” means a surface or pavement constructed and maintained to a standard sufficient to prevent the transmission of liquids beyond the pavement surface.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“recovery” means any of the operations provided for in Annex II to Directive 2008/98/EC of the European Parliament and of the Council on waste.

“sealed drainage system” in relation to an impermeable surface, means a drainage system with impermeable components which does not leak and which will ensure that:

- no liquids will run off the surface otherwise than via the system
- all liquids entering the system are collected in a sealed sump, except where liquids may be lawfully discharged to foul sewer.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste.

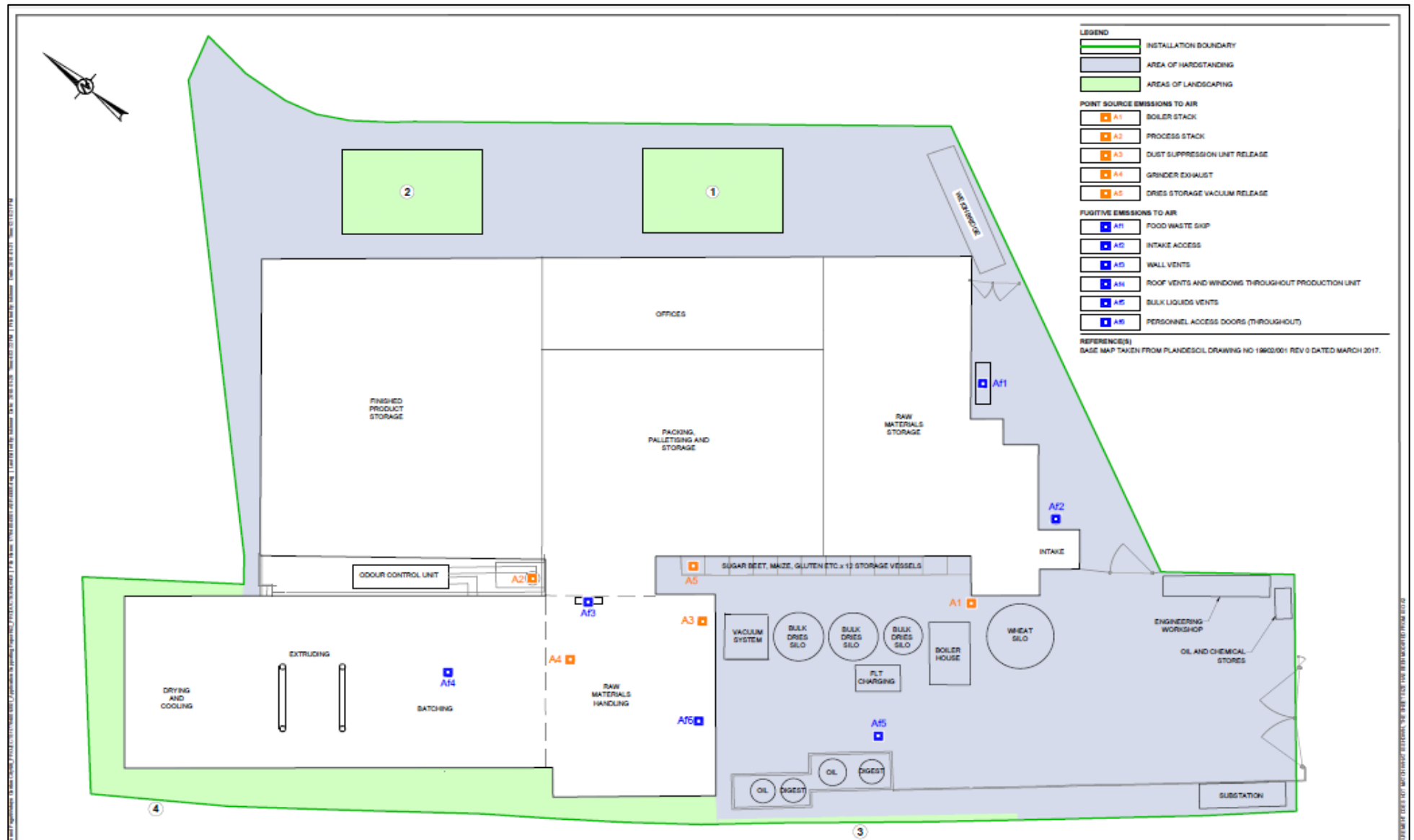
“year” means calendar year ending 31 December.

Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

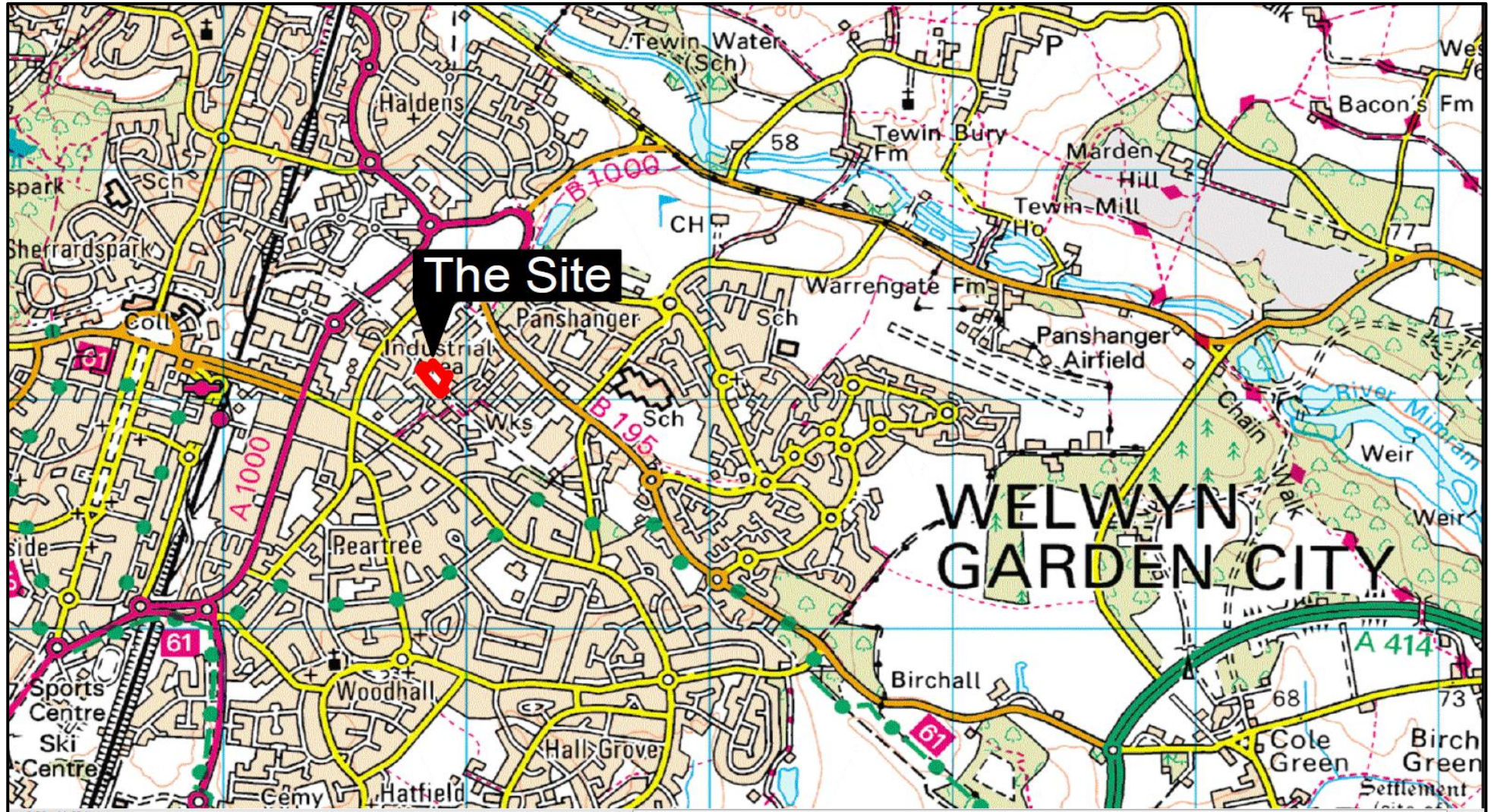
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid fuels, 5% for gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content.

# Schedule 7 – Site plan



Site location plan



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END OF PERMIT

Permit number  
EPR/YP3135YD



<b>Permit Number:</b>	<b>EPR/YP3135YD</b>	<b>Operator:</b>	<b>Gilbertson &amp; Page Limited</b>
<b>Facility:</b>	<b>Brownfields Pet Food Factory</b>	<b>Form Number:</b>	<b>Air1 / 12/02/18</b>

### Reporting of emissions to air for the period from DD/MM/YYYY to DD/MM/YYYY

Emission Point	Substance / Parameter	Emission Limit Value	Reference Period	Result [1]	Test Method [2]	Sample Date and Times [3]	Uncertainty [4]
A2	Particulate matter	50 mg/m <sup>3</sup>			BS EN 14181		
A3	Particulate matter	50 mg/m <sup>3</sup>			BS EN 14181		
A4	Particulate matter	50 mg/m <sup>3</sup>			BS EN 14181		
A5	Particulate matter	50 mg/m <sup>3</sup>			BS EN 14181		

[1] The result given is the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, the result is given as the 'minimum – maximum' measured values.

[2] Where an internationally recognised standard test method is used the reference number is given. Where another method that has been formally agreed with the Environment Agency is used, then the appropriate identifier is given. In other cases the principal technique is stated, for example gas chromatography.

[3] For non-continuous measurements the date and time of the sample that produced the result is given. For continuous measurements the percentage of the process operating time covered by the result is given.

[4] The uncertainty associated with the quoted result at the 95% confidence interval, unless otherwise stated.

Signed .....

Date.....

(Authorised to sign as representative of operator)

<b>Permit Number:</b>	<b>EPR/YP3135YD</b>	<b>Operator:</b>	<b>Gilbertson &amp; Page Limited</b>
<b>Facility:</b>	<b>Brownfields Pet Food Factory</b>	<b>Form Number:</b>	<b>WaterUsage1 / 12/02/18</b>

**Reporting of Water Usage for the year**

<b>Water Source</b>	<b>Usage (m<sup>3</sup>/year)</b>	<b>Specific Usage (m<sup>3</sup>/unit output)</b>
Mains water		
<b>TOTAL WATER USAGE</b>		

Operator's comments:

Signed .....

Date.....

(Authorised to sign as representative of operator)

<b>Permit Number:</b>	<b>EPR/YP3135YD</b>	<b>Operator:</b>	<b>Gilbertson &amp; Page Limited</b>
<b>Facility:</b>	<b>Brownfields Pet Food Factory</b>	<b>Form Number:</b>	<b>Energy1 / 12/02/18</b>

### Reporting of Energy Usage for the year

Energy Source	Energy Usage		Specific Usage (MWh/unit output)
	Quantity	Primary Energy (MWh)	
Electricity*	MWh		
Natural Gas	MWh		
TOTAL	-		

\* Conversion factor for delivered electricity to primary energy = 2.4

Operator's comments:

Signed .....

Date.....

(Authorised to sign as representative of operator)

<b>Permit Number:</b>	<b>EPR/YP3135YD</b>	<b>Operator:</b>	<b>Gilbertson &amp; Page Limited</b>
<b>Facility:</b>	<b>Brownfields Pet Food Factory</b>	<b>Form Number:</b>	<b>Performance1 / 12/02/18</b>

**Reporting of other performance indicators for the period DD/MM/YYYY to DD/MM/YYYY**

<b>Parameter</b>	<b>Units</b>
Total raw material used	tonnes or m <sup>3</sup>
Total finished product produced	tonnes
Waste disposed and/or recovered	tonnes
Boiler usage	hours

Operator's comments:
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Signed .....

Date.....

(Authorised to sign as representative of operator)