

# Permitting decisions

## Bespoke permit

---

We have decided to grant the permit for Brownfields Pet Food Factory operated by Gilbertson & Page Limited.

The permit number is EPR/YP3135YD.

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 provides a record of the decision making process. It summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account.

This decision document provides a record of the decision making process. It:

- highlights key issues in the determination
- summarises the decision making process in the decision checklist to show how all relevant factors have been taken into account
- shows how we have considered the consultation responses.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit. The introductory note summarises what the permit covers.

## **Description of the main features of the Installation**

The Installation is located in an industrial and commercial area of Welwyn Garden City at national grid reference TL 24862 13117. 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.

# Key issues of the decision

## 1. Regulation of the Installation

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 under EPR, Part A(1) 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).

Given that the site is currently in operation under a Part B permit, we have taken a risk-based approach and therefore set pre-operational conditions 1 to 9 in the permit. We have specified that the applicant (now the operator) must not increase the production throughput above the threshold given in Section 6.8 A(1)(d)(iii)(aa) EPR 2016, until all the pre-operational conditions in the permit (Table S1.3) have been completed and a written approval is obtained from the Environment Agency.

## 2. Management of odour emissions

The operations at the Installation have the potential to be odorous therefore an odour management plan (OMP) was submitted as part of the application. We assessed the applicant's OMP during the determination. The key points from our assessment are outlined below:

- The applicant's management of odour at the Installation relies on abatement using UV lamps and ozone which serves the extrusion process area. Although general comments have been made with respect to the management of odour, sufficient details have not been provided.
- A detailed description of the critical control points of each part of the manufacturing process has not been provided, hence the perceived odour risk cannot be measured. Monitoring of process parameters has not been mentioned in the application and the OMP. Monitoring of the manufacturing process ensures that action is taken at an early stage to prevent any instability and hence the potential to give rise to odour episodes. Contingency measures have not been proposed for each identified risk to bring the abnormal operating conditions back into compliance.
- Emergency scenarios and the applicant's management of them are non-existent and have not been well thought through.
- There are several parts of the process that emit unabated gases into the enclosed building with subsequent release to the atmosphere. The location of an external storage of biodegradable waste has the potential to give rise to odour emissions.
- The applicant acknowledges that the current odour abatement system (UV lamps and ozone) is not working well to reduce odour emissions on site. The applicant has proposed improvement conditions to address these issues.

Whilst it is noted that the current abatement is not working as it should, we consider that appropriate measures should be in place to minimise and control odour at the Installation before the use of abatement plant is explored. The applicant has not taken this approach in that odour abatement has been given more consideration at the expense of good housekeeping, preventative actions, robust monitoring and appropriate containment.

We notified the applicant about the above deficiencies in their OMP via an information notice served on 20 October 2017. The applicant attempted to address the above issues in a revised OMP dated November 2017. However, following our review of the revised OMP, our initial comments have not been addressed satisfactorily. Consequently we are not able to approve the site OMP in its current format.

We note that the applicant has made a commitment to work with the Environment Agency to address the odour management issues on site with further discussions with respect to odour abatement scheduled to

take place in 2018. We recognise that some of the issues raised in our review cannot be addressed until these discussions are concluded and the site's odour abatement system is overhauled.

We therefore consider it prudent to set the following pre-operational conditions in the permit:

Pre-operational condition 1

This condition requires the operator to undertake emissions monitoring to identify the pollutants (including speciation) and the concentrations ranges from the start of the process (batching) to the packaging of the finished product. This will ensure that the proposed odour abatement system is fit for purpose and can achieve the abatement of pollutants identified during the emissions monitoring. The emissions monitoring will also identify whether emissions limits should be set for combustion pollutants (nitrogen oxides and carbon monoxide) released via emission point A2 from the drying process.

Pre-operational condition 2

The operator is required to provide a commissioning plan for the installation of the proposed odour abatement system (including air extraction) under this condition. The plan will include a commissioning programme, details of odour abatement plant monitoring protocols and an assessment of the performance of the abatement system against design parameters. The commissioning plan will ensure that permit conditions will be met under all anticipated operating conditions and the site odour emissions will not extend beyond the site.

Pre-operational condition 3

This condition is a requirement for the operator to install and commission the proposed odour abatement system, subject to any such amendments or additions as notified by the Environment Agency.

Pre-operational condition 4

The operator is required to provide a revised odour management plan following the completion of pre-operational condition 3 (installation of the odour abatement system) for review, comment and final approval by the Environment Agency subject to any such amendments or additions as notified by the Environment Agency. This condition will ensure that the final OMP for the site is adequate, fit for purpose and can be enforced.

**3. Environmental management system (EMS)**

The applicant provided a summary of the Environment Management System (EMS) as part of the permit application, which is acceptable for determination purposes. We are satisfied that appropriate management systems and management structures are in place for this Installation, and that sufficient resources are available to the operator to ensure compliance with all the permit conditions.

The applicant is in the process of developing the full EMS for the Installation in line with ISO 14001 and the Environment Agency Guidance: *Develop a management system: environmental permits*. An overarching environmental policy and several process specific environmental operating procedures are in place, with the remaining elements (additional procedures, monitoring procedures, training and review programmes) still under development. The applicant states that a gap analysis was undertaken in August 2017. The first assessment stage by the British Standards Institution was scheduled in December 2017 and the second in January 2018. Consequently some of the site EMS documents are in the draft format and improvements to the documentation and systems are currently in progress.

The applicant provided a site EMS in January 2018. We have reviewed the site EMS and we consider that document lacks the details specified in our guidance document, *Develop a management system: environmental permits*. We have therefore set the following pre-operational conditions with respect to the site EMS:

Pre-operational condition 5

This condition requires the operator to develop a written /documented preventative-based maintenance management system for plant, including conditional maintenance (if applicable) of equipment and site

infrastructure whose failure could impact on the environment. We have set this pre-operational condition to ensure that the operator undertakes a programme of Planned Preventative Maintenance (PPM) for plant, equipment and site infrastructure to reduce poor performance which could result in pollution incidents.

#### Pre-operational condition 6

This condition requires the operator to 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. We have set this pre-operational condition to ensure that staff and contractors have the skills and knowledge they need for the work they do on site and that staff roles and responsibilities are defined and communicated.

#### Pre-operational condition 7

This condition is a requirement for the operator to develop an accident management plan which identifies accidents /incidents which could have an impact on the environment. We have set this condition to ensure that impacts on the environment are minimised in the event of potential accidents, e.g. equipment breakdowns, enforced shutdowns, fires, vandalism, flooding, or any other incident which causes an unexpected change to normal operations, e.g. poor weather conditions.

#### Pre-operational condition 8

Under this condition, the operator is required to develop a document management system and documented written procedures for all the permitted installation activities. The system shall include both normal and abnormal operating conditions and a system for investigating any deviations and environmental complaints. We have set this condition to ensure that the operator keeps up-to-date information relevant to operating on-site activities in accordance with the management system, Environment Agency guidance and the environmental permit.

### **4. Fugitive emissions to air, land and water**

The Industrial Emissions Directive (IED) specifies that plants must be able to demonstrate that they are designed in such a way as to prevent the unauthorised and accidental release of polluting substances into soil, surface water and groundwater.

Activities on site will be operated in accordance with the site's management system. This will include regular inspections and maintenance of plant to ensure they continue to operate at optimum conditions.

Good housekeeping practices will be applied and regular inspection and cleaning of process areas on site. General cleaning of process plant is undertaken at each shift changeover and a deep cleaning of process plant is undertaken weekly. All bulk lorries delivering raw materials will tip their contents into an intake pit behind a plastic curtain preventing the release of dust and odour emissions. From the pit, the raw material is blown to the silos and the ductwork is closed once the transfer has been completed. The intake pit is cleaned in between bulk deliveries.

The bulk storage silos, oil and fat storage tanks are fitted with high level probes and audible /visual alarms to prevent overfilling.

Secondary containment is provided for all above-ground tanks containing liquids whose spillage could be harmful to the environment and is designed to hold a minimum of 110% of the capacity of the largest tank or 25% of total tank volume, whichever is the greater. The storage bins for dry feedstock (rice, barley, maize gluten) are stored on hardstanding and checked as part of the site's regular inspections. Chemicals are stored in closed containers on drip trays within a designated chemical store which is kept locked.

The operator reports that the process areas are on hardstanding which will prevent the release of potentially polluting liquids to surface water and groundwater. The operator recognises that some areas that are on hardstanding are cracked and/or in poor condition. We have therefore set pre-operational condition 9 which requires the operator to undertake a survey to determine the integrity, adequacy and suitability of existing site hardstanding, kerbing and secondary containment for above-ground tanks and compare these with the requirements of the relevant guidance notes (Food and Drink Sector Guidance (EPR 6.01), DEFRA Process

Guidance Note 6/26(13) – Statutory guidance for animal feed compounding), CIRIA and /or other industry sector standard. The operator is required to implement any improvements with the timescales agreed in writing by the Environment Agency. This will ensure that the existing site hardstanding, kerbing and secondary containment is fit for purpose to reduce the risks of accidents and their consequences.

The permit conditions (3.2.1 to 3.2.3) are sufficient to ensure that emissions of substances not controlled by emission limits do not cause pollution. The operator is required to implement mitigation measures in line with an approved emissions management plan in the event activities on site are causing pollution. Based upon the information provided in the Application, we are satisfied that appropriate measures are in place to prevent fugitive emissions to air, land and water.

## **5. Abatement, emission limits and monitoring requirements**

Particulate emissions are released on a continuous basis from the main process stack (emission point A2), dust suppression unit (emission point A3), grinder exhaust (emission point A4) and dries storage vacuum system (emission point A5). The operator provided information which showed that actual monitoring data were significantly below the stated emission limit value (ELV) for the sector. We have therefore set an ELV of 50 mg/m<sup>3</sup> for emission points A2, A3, A4 and A5 (see below). These ELVs have been set in accordance with the Food and Drink Sector Guidance (EPR 6.01) and the DEFRA Process Guidance Note 6/26(13) – Statutory guidance for animal feed compounding.

There is a single calibrated particulate monitoring system with central data logger system installed at the Installation, supplied by Environmental Monitoring Solutions Limited (EMS). The system monitors particulate at five locations within the process: A2 process stack, A3 dust suppression unit, A4 grinder exhaust, A5 dries storage vacuum and bin 12 fines collection. At each of these locations, the system is fitted with an Auburn 3400 dust monitor, linked directly to a touch panel where data is available.

Process plant connected to these monitors are as follows:

- A2 process stack – outlet from the drying process via cyclones
- A3 Dust suppression unit – collection of dust throughout whole plant via a reverse jet filter
- A4 Grinder exhaust – Air used to dram material through the hammer mill via reverse jet filter
- A5 Dries storage vacuum – collection of dust via a reverse jet filter
- Bin 12 – Fines collection. Dispersed air from intake system via reverse jet filter

Information on particulates releases is available in real-time through the touch panels and also via a web interface. The operator reports that the servicing, isokinetic testing and calibration of the system is undertaken in line with an annual service contract.

We have specified that monitoring should be carried out for the parameters listed in Schedule 3 table S3.1 in the permit, using the methods and to the frequencies in those tables. These monitoring requirements have been imposed in order to demonstrate compliance with emission limit values (where specified). The emissions from the boiler are not considered to be a major source of pollution and do not require any further assessment. Consequently, we have not set any ELVs for the natural gas fired boiler (emission point A1).

<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>
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	Particulate matter	50 mg/m <sup>3</sup>	Daily average	Continuous measurement
A3 [Point A3 on site plan in schedule 7]	Dust suppression unit stack	Particulate matter	50 mg/m <sup>3</sup>	Daily average	Continuous measurement
A4 [Point A4 on site plan in schedule 7]	Grinder exhaust stack	Particulate matter	50 mg/m <sup>3</sup>	Daily average	Continuous measurement
A5 [Point A5 on site plan in schedule 7]	Dries storage vacuum	Particulate matter	50 mg/m <sup>3</sup>	Daily average	Continuous measurement
Vents	Digest and Oil tanks	No parameter set	No limit set	--	--

It is considered that the ELVs described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured.

Emissions of nitrogen dioxide, particulate matter and carbon monoxide have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation.

We shall consider setting new emission parameters, limits and monitoring requirements following the completion of pre-operational condition 1.

## Decision checklist

Aspect considered	Decision
<b>Receipt of application</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.
<b>Consultation</b>	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> <li>• Public Health England</li> <li>• Director of Public Health (Hertfordshire County Council)</li> <li>• Welwyn Hatfield Council (Environmental Health Department)</li> <li>• Welwyn Hatfield Council (Planning Authority)</li> <li>• Food Standards Agency</li> <li>• Health &amp; Safety Executive</li> <li>• Thames Water</li> </ul> <p>The comments and our responses are summarised in the <a href="#">consultation section</a>.</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 legal operator for environmental permits.
<b>The facility</b>	
The regulated facility	We considered the extent and nature of the facility/facilities at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation', Appendix 1 of RGN 2 'Interpretation of Schedule 1', guidance on waste recovery plans and permits. The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.
<b>The site</b>	
Extent of the site of the facility	The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.



Aspect considered	Decision
Biodiversity, heritage, landscape and nature conservation	<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 natural gas fired boiler (thermal input of 2.49 MW) is used on site to generate steam. Pet food pellets are dried in four natural gas-fired ovens (each of a thermal input of 1.5 MW).</p> <p>We have assessed the application and its potential to affect all known sites of nature conservation, landscape and heritage and/or protected species or habitats identified in the nature conservation screening report as part of the permitting process.</p> <p>We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified. Emissions of nitrogen oxides have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the Installation.</p> <p>We have not consulted Natural England on the application. The decision was taken in accordance with the above guidance AQTAG14.</p>
<b>Environmental risk assessment</b>	
Environmental risk	<p>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 acceptable.</p>
<b>Operating techniques</b>	
General operating techniques	<p>The operator has discussed how the site is in accordance with Best Available Techniques (BAT) standards in their application. A BAT assessment has been included which considers the main emissions from the site and identifies the appropriate measures that have been put in place on site to address these where required.</p> <p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes (Food and Drink Sector Guidance (EPR 6.01) and DEFRA Process Guidance Note 6/26(13) – Statutory guidance for animal feed compounding). The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.</p> <p>The key measures proposed by the operator include the following:</p> <ul style="list-style-type: none"> <li>• Abatement equipment (filters) are fitted to plant releasing particulates via emission points A2, A3, A4 and A5.</li> <li>• Use of high level probes and alarms on the bulk storage silos, oil and fat storage tanks to prevent overflowing.</li> <li>• Any material that is rejected or spilled is re-worked into the process where possible. This minimises the amount of waste generated. Any product that is contaminated and cannot be reworked is despatched to a biogas plant off-site as feedstock.</li> <li>• Secondary containment is provided for all above-ground tanks containing liquids whose spillage could be harmful to the environment</li> </ul>

Aspect considered	Decision
	<p>and is designed to hold a minimum of 110% of the capacity of the largest tank or 25% of total tank volume, whichever is the greater;</p> <ul style="list-style-type: none"> <li>The storage and maintenance of dusty materials is within enclosed or covered areas, such as waste skips for waste;</li> </ul> <p>The proposed techniques for control are in line with the benchmark levels contained in the Technical Guidance Note (TGN) above and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</p>
Operating techniques for emissions that screen out as insignificant	Emissions of nitrogen oxides, carbon monoxide and particulate matter have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation. We consider that the emission limits included in the Installation permit reflect the BAT for the sector.
Odour management	We have reviewed the odour management plan in accordance with our guidance on odour management. We consider that the odour management plan is not satisfactory (see Key Issues section).
<b>Permit conditions</b>	
Use of conditions other than those from the template	Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.
Pre-operational conditions	Based on the information in the application, we consider that we need to impose pre-operational conditions (see Key Issues section).
Emission limits	We have decided that emission limits are required in the permit (see Key Issues section).
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit (particulate matter), using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured (see Key Issues section).</p> <p>We made these decisions in accordance with the Food and Drink Sector Guidance (EPR 6.01) and the DEFRA Process Guidance Note 6/26(13) – Statutory guidance for animal feed compounding.</p> <p>Based on the information in the application we are fully satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.</p>
Reporting	<p>We have specified reporting in the permit. We have specified that the operator reports the particulate concentration from emission points A2, A3, A4 and A5 on an annual basis. Actual particulate emissions are significantly below the ELV specified in the permit. As the risk of exceedance of the ELV is low, annual reporting is considered appropriate.</p> <p>We made these decisions in accordance with the Food and Drink Sector Guidance (EPR 6.01) and the DEFRA Process Guidance Note 6/26(13) –</p>

Aspect considered	Decision
	Statutory guidance for animal feed compounding.
<b>Operator competence</b>	
Management system	<p>There is no known reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.</p> <p>The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.</p>
Relevant convictions	<p>The Case Management System and National Enforcement Database have been checked to ensure that all relevant convictions have been declared. No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.</p>
Financial competence	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
<b>Growth Duty</b>	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

# Consultation

The following section summarises the responses to consultation with other organisations and our notice on GOV.UK for the public and the way in which we have considered these in the determination process. Newspaper advertising is only carried out for certain application types, in line with our guidance. The Application has been advertised and consulted upon in accordance with the Environment Agency's Public Participation Statement. Copies of all consultation responses have been placed on the Environment Agency Public Register.

The Application was advertised on the Environment Agency website (GOV.UK) and Citizen Space from 3 October 2017 to 31 October 2017.

## Responses from organisations listed in the consultation section

<b>Representation received from Public Health England (PHE) – Comment 1</b>
<p>PHE 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:</p> <ul style="list-style-type: none"><li>• Emissions to air from point sources on site including nitrogen dioxide (NO<sub>2</sub>), particulate matter less than 10 µm (PM<sub>10</sub>) and carbon monoxide (CO);</li><li>• Fugitive emissions of particulate matter or dust from activities on site; and</li><li>• Odour arising from point and fugitive sources on site.</li></ul>
<b>Summary of actions taken or show how this has been covered</b>
<p>Emissions of nitrogen dioxide, particulate matter and carbon monoxide have been screened out as insignificant, and so we agree that the applicant's proposed techniques are BAT for the installation. We have set emission limits for particulate matter (emission points A2, A3, A4 and A5) as specified in the Food and Drink Sector Guidance (EPR 6.01) and the DEFRA Process Guidance Note 6/26(13) – Statutory guidance for animal feed compounding. We consider that the emission limits included in the Installation permit reflect BAT for the sector.</p>
<b>Representation received from Public Health England (PHE) – Comment 2</b>
<p>In relation to potential risk to public health, PHE recommend that the Environment Agency also consult the following relevant organisation(s) in relation to their areas of expertise:</p> <ul style="list-style-type: none"><li>• the local authority for matters relating to impact upon human health of contaminated land; noise, odour, dust and other nuisance emissions; and</li><li>• the Director of Public Health for matters relating to wider public health impacts.</li></ul>
<b>Summary of actions taken or show how this has been covered</b>
<p>We consulted the following organisations during the determination:</p> <ul style="list-style-type: none"><li>• Director of Public Health (Hertfordshire County Council)</li><li>• Welwyn Hatfield Council (Environmental Health Department)</li><li>• Welwyn Hatfield Council (Planning Authority)</li></ul> <p>No concerns were raised by these organisations.</p>
<b>Representation received from Public Health England (PHE) – Comment 3</b>
<p>Based on the information contained in the application supplied to us, PHE has no significant concerns regarding the risk to the health of the local population from the installation. This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.</p>
<b>Summary of actions taken or show how this has been covered</b>
<p>No further action. The proposed Installation will be operated in accordance with BAT to prevent or control pollution as specified in our technical guidance notes: Food and Drink Sector Guidance (EPR 6.01), DEFRA Process Guidance Note 6/26(13) – Statutory guidance for animal feed compounding and H4 – Odour Management.</p>

<b>Representation received from Welwyn Hatfield Council (Environmental Health Department)</b>
Welwyn Hatfield Council advised that the replacement abatement plant to be installed will improve the current issues concerning odour and air quality. As such, no objections are raised with regard to the application for a permit with the Environmental Agency.
<b>Summary of actions taken or show how this has been covered</b>
No further action.

<b>No representations received from:</b>
<ul style="list-style-type: none"> <li>• Director of Public Health (Hertfordshire County Council)</li> <li>• Welwyn Hatfield Council (Planning Authority)</li> <li>• Food Standards Agency</li> <li>• Health &amp; Safety Executive</li> <li>• Thames Water</li> <li>• Members of the Public</li> </ul>