

# Permit with introductory note

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

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Greencore Food To Go Limited  
Greencore Food To Go Park Royal  
8 Willenfield Road  
Park Royal  
London  
NW10 7AQ

### **Permit number**

EPR/ZP3839YR

# Greencore Food To Go Park Royal

## Permit number EPR/ZP3839YR

### Introductory note

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

The main features of the permit are as follows.

Greencore Food to go Park Royal is a sandwich and wrap production facility located on an industrial park in Park Royal, London. The main building is centred on National Grid Reference TQ19988323. The site comprises of two separate factories (factory 1 and factory 2), with an unrelated building between them. Factory 2 is used for ambient and refrigerated storage only, and for other activities which are not subject to Environmental Permitting Regulations.

The Environmental Permit is for the following scheduled activities:

- Section 6.8 Part A(1) (d)(iii)(aa) – Treatment and processing of food, with a finished product production capacity of greater than 75 tonnes per day, where the proportion of animal material in the product is greater than 10%.
- Section 5.4 Part A(1) (a)(ii) - Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.

Raw materials are stored (factory 2) in ambient conditions or a chilled environment between 0°C and 5°C as necessary. As required, they are then transferred to the production facility (factory 1) where they are unloaded into a low care area and stored. Transfer between factory 1 and factory 2 is using refrigerated lorry. Raw materials then pass through a sanitiser mist tunnel before entering the high care food preparation area, with the exception of bread (which does not require sanitisation) and salad/vegetables, which enter the high care area via a vegetable washing machine. There is a 200l sanitiser bath which forms a backup to the sanitiser tunnel. Ingredients are then prepared (untinned, debagged, mixed, sliced, grated etc.) and placed in tote bins or food trays. These products are stored by food group (proteins, allergens, dairy etc.) in Work In Progress (WIP) chillers at below 5°C until they are needed on the production lines.

The production area comprises 11 conveyor lines with a total production capacity of 154 tonnes per day, of sandwiches and wraps. For sandwiches, one side of the bread is automatically coated with a layer of butter or alternative fat. Products are then assembled by hand from raw materials. They are then fed on a conveyor into cutters and card denesters that place them into packaging – either cardboard cartons or plastic sleeves. The factory temperature for the production area is between 8°C and 12°C. The product then moves to despatch where it is boxed up or placed into sandwich trays and stored in chillers to await despatch in refrigerated lorries. The temperature in the packing area is below 5°C.

Inputs comprise food ingredients, packaging and cleaning chemicals. Wastes comprise of food, non-food and cardboard, which are segregated and sent off site for recovery or disposal. The manufacturing activity has supporting processes including 2 steam boilers (0.8 MW<sub>th</sub> and 0.7 MW<sub>th</sub>), refrigeration units, and a dissolved air flotation effluent treatment plant. Key emissions are products of combustion released to air, and effluent discharge to sewer. Uncontaminated surface water is released to surface drainage. Odour emissions are controlled, including using odour abatement units on the effluent treatment plant. The facility is operated under an environmental management system.

The site is bordered to the North by the Paddington branch of the Grand Union Canal, and is situated in an industrial/commercial area. Further north of the site, there are railway lines and Brent Junction. The factory lies within Brent AQMA, which has been declared since 2006 for particulate matter (PM<sub>10</sub>) 24-hour mean, and nitrogen dioxide (NO<sub>2</sub>) annual mean, and is surrounded by other London AQMAs. The nearest sensitive human receptor is Park Royal Centre for Mental Health, which is 160m from the installation. The nearest residential receptors are more than 400m from the site at Moyne Place. Richmond Park Special Area of Conservation is 8.7 km from the site, and a number of local nature reserves and wildlife sites are in proximity of the site, with the closest being the canal adjacent to the site.

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/ZP3839YR/A001	Duly made 18/06/19	Application for bespoke installation permit for sandwich making factory.
Additional information received	20/06/19	Assessment of possible cadmium, mercury and phosphate contribution from chemical raw materials
Additional information received	31/07/19	Clarification of chemical storage arrangements and effluent discharge
Additional information received	14/08/19	Additional information on position and dimensions of emissions points A1 and A2 and the buildings in which they are located
Additional information received	19/08/19	Additional information on chemical storage & bunding (including revised accident management plan), air emissions reports for boiler 1 and boiler 2, BAT assessment against new draft BREF, revised Odour Management Plan
Permit determined EPR/ZP3839YR Billing Reference ZP3839YR	03/12/19	Permit issued to Greencore Food To Go Limited.

End of introductory note

# Permit

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

### Permit number

**EPR/ZP3839YR**

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

**Greencore Food To Go Limited** ("the operator"),

whose registered office is

**Greencore Group UK Centre  
Midland Way  
Barlborough Links Business Park  
Barlborough  
Chesterfield  
S43 4XA**

company registration number 00721411

to operate an installation at

**Greencore Food To Go Park Royal  
8 Willenfield Road  
Park Royal  
London  
NW10 7AQ**

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

Name	Date
Emma Pemberton	03/12/2019

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 Improvement programme**

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

## **2.5 Pre-operational conditions**

- 2.5.1 The operations specified in schedule 1 table S1.4A shall not commence the measures specified in that table 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, S3.2 and S3.3.
- 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 Monitoring**

3.5.1 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, S3.2 and S3.3;
- (b) process monitoring specified in table S3.4

3.5.2 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.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 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, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

### **3.6 Pests**

3.6.1 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.

3.6.2 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.

## **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.

## 4.3 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>		
Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
<p>S6.8 A1 (d)(iii)(aa)</p> <p>Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging):</p> <p>animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than:</p> <p>75 if A is equal to 10 or more, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.</p>	<p>Manufacture of sandwiches and wraps and preparation of component ingredients</p>	<p>From receipt and unpacking of raw materials, through production on one of 11 assembly lines, to dispatch of packaged product</p>
<p>S5.4 A1 (a)(ii)</p> <p>Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment: Physico-chemical treatment.</p>	<p>Effluent Treatment comprising of oversize solids screening, flocculation and dissolved air floatation, and final pH adjustment</p>	<p>From receipt of waste water to discharge to sewer</p>
<b>Directly Associated Activity</b>		
Combustion	0.8 MW <sub>th</sub> and 0.7MW <sub>th</sub> gas-fired hot water and steam boilers	From receipt of fuel and water to emission of hot water, steam, and combustion gases
Refrigeration and chilling	Blast chillers, chilled storage and despatch, process areas and frozen storage for both raw materials and finished product, utilising various refrigerant systems (R404A, R422D, R449a, R401A, glycol and propane).	Refrigeration of raw material and final packaged product, and operation of refrigeration plant
Raw material storage and handling	Ambient, refrigerated and frozen storage of raw materials	From receipt of raw materials to use in manufacture
Waste storage and handling	Storage and handling of wastes	From generation to removal from site for recovery or disposal.

Table S1.1 activities		
Storage and use of chemicals	Storage and use of chemicals for cleaning and operation of effluent treatment plant	Receipt, storage and use of chemicals.
Raw material sanitisation and cleaning	Mist tunnel and immersion bath	From receipt of ingredients from stores to delivery to food preparation or manufacturing areas
Food preparation	Washing, processing (slicing, grating etc.)	From start of manufacture to main sandwich and wrap production lines
Water Treatment	Ion exchange water softener	From input of mains water to output of treated water (4m <sup>3</sup> /h)
Hygiene and cleaning operations	Cleaning and sanitising of production line, totes, wheeled bins and trays, involving chemicals, steam and hot water for	From requirement for cleaning to readiness for re-use for production
Tray wash	Automated tray wash (incorporating water softening)	From requirement for cleaning to readiness for re-use for production

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	<p>Parts B2(v12) and B3(v9) of the Application Form including technical standards listed in Table 3a of form B3.</p> <p>The Supporting Information documents referenced ZP3839YR/A001:</p> <ul style="list-style-type: none"> <li>• <i>B2-5C Non-Technical Summary</i></li> <li>• <i>B2-6 Environmental Risk Assessment</i></li> <li>• <i>B3-3b Fugitive Emissions Review</i></li> <li>• B3-6e Waste Management</li> <li>• 6 Pest management</li> <li>• 7 Operating techniques and BAT assessment</li> <li>• 8 Site Drainage plan</li> <li>• 11 Maintenance Management System</li> <li>• 12 Training Management System</li> <li>• 16 Resource Efficiency and Waste Minimisation review</li> </ul>	15/06/19
Additional information	<p>The Supporting Information documents in response to our “request for information” prior to duly making application and referenced ZP3839YR/A001:</p> <ul style="list-style-type: none"> <li>• RFI1 Emission Point Plan v2</li> <li>• RFI 1.1 revised Application Form B3</li> <li>• RFI2 ETP layout</li> <li>• RFI 2.1 ETP spill containment</li> <li>• RFI5 Chemical inventory and storage plan</li> </ul>	19/06/19

Table S1.2 Operating techniques		
Description	Parts	Date Received
	<ul style="list-style-type: none"> <li>RFI6 Ground and groundwater protection measures</li> <li>RFI10 revised accident management plan</li> </ul>	
Additional information	Further information on bulk chemical storage and bunding in Effluent Treatment Plant area	31/07/19
Additional information	Revised Odour Management Plan	19/08/19
Additional information	BAT readiness assessment against new draft Food and Drink BREF	19/08/19

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>The Operator shall submit a written plan to the Environment Agency for technical assessment and approval. The plan must assess the operational effectiveness of secondary containment in the Effluent Treatment Plant and surrounding area. It must consider the design, method of construction and integrity of the system, and be carried out by suitably competent and qualified personnel. The assessment shall be made against the requirements of our guidance and Ciria C736<sup>(ref 1-3)</sup>. Where improvement requirements are identified, the plan must contain dates for their implementation. Improvements should include (but are not limited to):</p> <ul style="list-style-type: none"> <li>ensuring that jetting leak screens drain within bunded areas,</li> <li>investigations to confirm that containment would be effective, in the event of balance tank failure,</li> <li>integrity testing of bunds and drains,</li> <li>sealing off drains which are unused or which would compromise the containment plan,</li> <li>modification of containment design, so that bunded areas or sub-areas collect and do not drain back to the ETP inlet,</li> <li>any associated repairs or modifications to existing infrastructure including containment provided by the outside storage yard,</li> <li>plans for testing and maintenance to ensure ongoing fitness for purpose</li> </ul> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan. You must implement the plan as approved, and from the date stipulated by the Environment Agency.</p> <p>References:</p> <ol style="list-style-type: none"> <li><a href="https://www.gov.uk/guidance/pollution-prevention-for-businesses">https://www.gov.uk/guidance/pollution-prevention-for-businesses</a></li> <li><a href="https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit">https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit</a></li> <li>CIRIA 736 Containment systems for the prevention of pollution- <i>Secondary, tertiary and other measures for industrial and commercial premises</i>, London 2014, ISBN: 978-0-86017-740-1.</li> </ol>	Within 6 months of permit issue
IC2	<p>The Operator shall submit a written plan to the Environment Agency for technical assessment and approval. The report provided shall be agreed in writing by the Environment Agency in order for the improvement condition to be completed. The plan must:</p>	Within 6 months of permit issue

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ol style="list-style-type: none"> <li>1. assess the need for, and feasibility of measures to further protect ground and surface water from possible releases from areas of operational hardstanding outside Factory 1 and Factory 2, and from drainage within Factory 2.</li> <li>2. demonstrate that that only uncontaminated surface water runoff is discharged to surface water drains (W1 and W2).</li> </ol> <p>The assessment shall be made against the requirements of our guidance<sup>(ref1-2)</sup>. Where additional measures to reduce this risk are identified, the plan must contain dates for their implementation. Improvements could include (but are not limited to):</p> <ul style="list-style-type: none"> <li>• diverting water away from surface water drains (in either all operational scenarios, or under specific conditions) where there is a risk of contamination,</li> <li>• identifying and sealing off unused surface water drains, or those which present a risk of surface water contamination, particularly those inside factory 2,</li> <li>• changes to operational practices (e.g. what activities are carried out in yard areas which drain to surface water),</li> <li>• installing oil interceptors,</li> <li>• manually or automatically detecting contamination and instigating protective action such as operation of the surface water isolation valve,</li> <li>• any necessary repairs/improvements to existing infrastructure including concrete surfaces and expansion joints,</li> <li>• plans for inspection, testing and maintenance of drainage and surfaces to ensure ongoing fitness for purpose,</li> <li>• monitoring to confirm that no contamination of surface water is detected,</li> </ul> <p>You must implement the plan as approved, and from the date stipulated by the Environment Agency. You must provide updated drainage plan(s) if alterations are made</p> <p>References:</p> <ol style="list-style-type: none"> <li>1. <a href="https://www.gov.uk/guidance/pollution-prevention-for-businesses">https://www.gov.uk/guidance/pollution-prevention-for-businesses</a></li> <li>2. <a href="https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit">https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit</a></li> </ol>	

Table S1.4A Pre-operational measures for future development		
Reference	Operation	Pre-operational measures
PO1	Commissioning of acid storage tank in Effluent Treatment Plant	The Operator shall submit a written plan to the Environment Agency for technical assessment and approval. The plan must assess the risk of reaction between incompatible bulk chemicals being stored in a common bund (e.g. acid and alkali) in the event of simultaneous failure. If a risk is identified, the plan must propose measures to reduce or eliminate risk, or mitigate effects. You must receive approval of the plan and implement any measures proposed the plan as approved, before acid is stored within the existing concrete bond.

Table S1.4A Pre-operational measures for future development		
Reference	Operation	Pre-operational measures
PO2	Commissioning of acid storage tank in Effluent Treatment Plant	The Operator shall submit a written plan to the Environment Agency for technical assessment and approval. The plan must assess the suitability of the existing concrete bund in respect of resistance to the acid proposed to be stored. In the event that resistance is currently insufficient to prevent ground contamination, corrective measures shall be proposed to ensure that existing bunding is made sufficient, or alternative bunding is provided. You must receive approval of the plan and implement any measures proposed the plan as approved, before acid is stored within the existing concrete bond.



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

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

## Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on site plan in Schedule 7]	Boiler 1	Combustion gases	No limit	-	-	-
A2 [Point A2 on site plan in schedule 7]	Boiler 2	Combustion gases	No limit	-	-	-
A3 [Point A2 on site plan in schedule 7]	Odour extraction unit from Effluent Treatment Plant room	Odour	No limit	-	-	-
A4 [Point A2 on site plan in schedule 7]	Odour abatement unit from Effluent Treatment Plant Sludge Tank	Odour	No limit	-	-	-

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 on site plan in schedule 7 emission to surface water drainage	Uncontaminated surface water from surfaced areas (yard and roof) of Factory 1	-	-	-	-	-
W2 on site plan in schedule 7 emission to surface water drainage	Uncontaminated surface water from surfaced areas (yard and roof) of Factory 2	-	-	-	-	-

<b>Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements</b>						
<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 plan in schedule 7 emission to Thames Water Beckton Park Sewage Treatment Works under terms of Trade Effluent Consent	On-site effluent treatment plant	-	-	-	-	-

<b>Table S3.4 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>
NOx and CO emissions from boiler 1	-	Annually	-	As required for boiler maintenance and optimisation
NOx and CO emissions from boiler 2	-	6-monthly	-	As required for boiler maintenance and optimisation

## Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
-	-	-	-

Table S4.2 Annual production/treatment	
Parameter	Units
Sandwich production	tonnes
Wrap production	tonnes
Effluent discharged	m <sup>3</sup>

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m <sup>3</sup>
Energy usage – electricity	Annually	MWh
Energy usage – gas	Annually	MWh
Total raw material used	Annually	tonnes
NOx and CO emissions, as measured for boiler maintenance for boiler 1	Annually	
NOx and CO emissions, as measured for boiler maintenance for boiler 2	Annually	
Effluent Treatment Plant Sludge removed from site	Annually	tonnes
Category 3 animal by-products removed from site	Annually	tonnes
Refrigerant gas consumed (stated separately for each refrigerant used)	Annually	kg

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Water and raw material usage	Form WU/RM 1 or other form as agreed in writing by the Environment Agency	03/12/19
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	03/12/19
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	03/12/19

# 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	EPR/ZP3839YR
Name of operator	Greencore Food To Go Limited
Location of Facility	Greencore Food To Go Park Royal
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>(c) 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.

“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.

“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.

“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.

“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.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005 (as amended).

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

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste, as amended from time to time.

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

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

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.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

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

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 and 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.

“year” means calendar year ending 31 December.

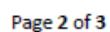


# Schedule 7 – Site plan

## Installation boundary plan

Greencore Food to Go Ltd,  
8 Willen Field Road, Park Royal,  
London, NW10 7AQ.  
Grid ref TQ 19983 83227  
Site boundary shown in green



**Factory 1**

W2

END OF PERMIT