Permitting decisions

Bespoke permit

We have decided to grant the permit for Pets Choice operated by Pets Choice Limited.

The permit number is EPR/LP3508BR/A001.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document 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.

Key issues of the decision

Introduction

The proposed operations were subject to a previous permit application which was subsequently refused by the Environment Agency in October 2018 (EPR/RP3539CG). This decision document covers only the resubmission of the application which has addressed those key issues raised within the refusal decision document.

Below are a commentary of the key issues which we assessed as part of the determination of the permit application re-submission (EPR/LP3508BR/A001). Other permitting key issues are outlined and addressed in the refusal decision document issued October 2018.

Odour abatement systems

There are a number of permitted processes at the Pets Choice site which generate and release odorous compounds into the air. These emissions are subject to extraction and treatment via abatement systems before being vented to atmosphere through a stack. The processes where point source odorous emissions originate are as follows:

- Band ovens and rack ovens used for the baking of speciality treats.
- Air handling units (AHU) (1 – 2) which extract air serving the chub and retort pouch cooking areas.
- Air handling unit 3 which extracts air serving the open meat grinding and mixing area.
- Wash rooms for dolavs (containers for carcass/meat and mixed raw material), dry and wet sides.
- Packing area extraction. This area contains the baked treats cooling area.
- Effluent treatment plant.

The applicant has provided a description of the current extraction system which includes air handling units, disposable panel filters for particulate matter removal and rudimentary carbon bag filters. As part of the applicant's detailed odour risk assessment, they indicate that these existing measures should be sufficient, however, recognise that these measures do not necessarily reflect Best Available Technology (BAT) due to limitations in the original design specifications. The applicant's odour risk assessment therefore outlines the further measures they will take to reduce the off-site odour concentration further, this is described below. The Applicant has also proposed modifications to the air extraction and abatement system which will be installed over the coming months (subject to improvement conditions in the permit). A summary of the proposed abatement system is outlined below alongside their justification as to why this system represents BAT for the treatment odorous VOCs produced at the site.

AHUs 1 – 3 will be fitted with new centrifugal type fans which will increase the level of negative pressure achieved within the various areas of the plant. Table 12 of the applicant's odour management plan demonstrates how the applicant has taken static pressure measurements to determine the levels of negative pressure achieved without the AHU modifications. The supplier of the modified extraction system has then used these measurements to assist in designing a system which is expected to exceed the supply volume by 27%. Therefore providing negative pressure (achieving 3 air changes per hour). The applicant has used qualified ventilation engineers to design and install the modifications to the extraction system. We recognise that negative pressure is subject to difficulties such as building (containment) integrity. The applicant has therefore committed to performing regular pressure testing during the operational phase of the system. We have also specified that the operator undertakes testing as part of commissioning (IC1) to reaffirm that extraction rates are achieving the design level of negative pressure.

Alongside the improvements proposed to the ventilation and extraction systems, the applicant proposes to install improved abatement systems. The treatment will continue via adsorption using carbon filtration media, however the applicant has demonstrated that the revised media used will be specifically selected for treating the characteristics in the airstream. Each AHU and extraction point will be fitted with a two stage abatement system comprising of; pre-treatment particulate panel filters and a carbon filter packed bed with a mixture of activated carbon media suited to the various air conditions.

The Food & Drink BAT conclusions and BAT reference document (BREF) specify that adsorption via a carbon filter is appropriate for this sector. It also outlines key operating parameters explaining where adsorption is less effective:

- Carbon adsorption is not effective at treating contaminated air at temperatures above 40°C.
- Efficiency of activated carbon is reduced in air flows with relative humidity above 75%.
- Process air should have a dwell time within the bed of at least 1 second.
- Typically water soluble VOCs will not be treated by adsorption.

Table 13 of the applicant's odour management plan addresses each of these aspects, providing a full justification for the chosen system. This can be summarised as follows:

- The media is selected on its ability to treat the likely types of organic compounds present in extracted air associated with the pet food manufacturing sector. Each bed will be made up of three types of media (including coconut shell) to ensure that the various VOCs are adsorbed.
- Monitoring of inlet air to the existing operational AHU3 found that relative humidity (RH) levels are 73%. The applicant has submitted evidence from the carbon media manufacturer demonstrating that the three types of carbon filter media selected can operate effectively up to RH of 95%.
- The carbon filters will not be used to treat air which is extracted directly from hot processes. Additionally, monitoring at the inlet for AHU3 recorded temperatures at 15°C.
- Based on experience from similar sites, the designer of the extraction systems has proposed a flow velocity of 0.45 m/s through the carbon bed. This will be designed to achieve a minimum dwell time of greater than 1 second as outlined by the air handling unit designers.
- The applicant identified that the odour reduction efficiencies are between 80% - 99%. The manufacturer of the media indicates that the reduction rates are anticipated to be within the upper regions of the range, but maintain that performance rates can vary. To account for the potential variability, the applicant's odour impact assessment assumes a conservative efficiency of 80%.
- The applicant has confirmed that pressure drop across each carbon filter unit, air temperature at the inlet and RH at each inlet will be monitored continuously for each carbon abated point source; Improvement conditions have been set to determine action levels and a comprehensive monitoring regime.

In combination with a series of improvement conditions, monitoring and verification of emissions, we accept that the implementation of the proposed modified air handling units and carbon adsorption abatement system design can be considered to represent BAT for management of odorous emission from the specified point sources. It should be noted however, that carbon abatement is not proposed for the emissions emanating from the direct oven cooking process. Odours emitted from the oven stack will rely on dispersion as the strategy for minimising odorous emissions. The applicant justifies their use through the odour impact assessment which will be discussed in further sections below.

Odour management plan

The applicant submitted an odour management plan (OMP) with their application in line with our guidance;

- *H4 Odour Management*
- *How to comply with your environmental permit – Additional guidance for the Food and Drink Sector* (EPR 6.10)

We have reviewed the plan and are satisfied it contains details of all possible sources of odours on site and outlines sufficient measures to control fugitive odour emissions from these sources. We consider it to be appropriate as it covers the following:

- An inventory of raw materials and their capacity to cause odour emissions.
- A description of the sources of odour on site, the key processes, equipment and storage activities. Each source is subject to a source – pathway – receptor risk assessment process.
- Key sensitive receptors within close proximity of the site (residences, schools, commercial and industrial premises) have been identified and described. An analysis of the sensitivity of the receptors shows that the closest residence is approximately 420m from the site. Commercial and industrial premises (of varying degrees of sensitivity) are within close proximity to the site boundary.
- For each odour source, the OMP systematically describes how odours will be minimised through primary (or active) control measures. For example during delivery of potentially odorous meat materials:
    - Roller shutter door remain closed between the reception and production areas.
    - HGVs positioned at the opened reception doors are enclosed to the outside environment via adjustable plastic curtains before meat materials are unloaded.
    - All meat materials are received in containers.
    - Material is subject to an acceptance/rejection procedure with clear triggers for rejection of odorous meats.
    - Incoming meats can only be stored in the reception area (once closed) for a maximum of two hours.
- Key odorous processes, in particular the creation of chub rolls which are produced in sealed pressure vessels. Due to the method of the cooking process, emissions are contained within the sealed system. When opened for feeding raw materials or cleaning, localised extraction and treatment via the abatement system is initiated.
- Demonstration that the abatement system can effectively treat odorous emissions from all point sources including hot or moist processes.
- Processes for monitoring treated air steams from point source emissions. Parameters include temperature, pressure and humidity. Furthermore, odour samples will be periodically taken and odorous compounds analysed against BS EN 13725:2003.
- Olfactory monitoring (sniff testing) will be carried out on a daily basis, performed by office based staff separated from the production process. The applicant has set out a procedure with action levels and an escalation process that would trigger further monitoring and contingency measures. The intensity and offensiveness of an odour are defined as numerical values. The monitoring form is attached to the OMP an appendix.
- Further process monitoring undertaken including plant checks and maintenance schedules.
- Contingency measures and how they are linked to odour risk scenarios which have specific trigger levels. Each contingency measure has a further backstop should the main measure prove to be not effective after a specified timeframe.

- Complaint procedures are specified with clear timeframes for responses to reports. The complaints procedure records form is attached as an appendix to the OMP.
- Commitment to review the OMP once every 6 months or after a complaint has been made.

The odour management plan satisfies the requirements of the guidance and also demonstrates where best available techniques are being used, we consider this to be satisfactory to grant the permit.

Odour impact assessment

To support the odour management plan and to inform their risk assessment, the applicant submitted an odour impact assessment. This provided justification for the use of dispersion as the odour control measure for emissions from the oven cooking process. For processes 'involving decaying animal or fish' H4 guidance on odour management, specifies a relevant but an indicative benchmark for assessing quantitative odour emissions. The benchmark level as a 98th percentile of 1 hour mean is 1.5 OU_E/m^3. Prior to the submission of this application, the applicant submitted a justification for assessing their estimated impacts based on the less stringent benchmark of 3.0 OU_E/m^3 (*Odour technical note – Pets Choice Manufacturing Facility, Blackburn*. Ref. 2534c1). The following factors were discussed as reasons for considering an alternative, less stringent criteria:

- The nature of the materials and processes at the facility. The raw materials are from human grade abattoirs with no materials being accepted from rendering facilities. No materials which are decaying will be accepted.
- The intensity of odours associated with the materials and processes. All materials are chilled from the point of production to arrival at site where they are processed within 2 hours of arrival on site. Otherwise, material is stored in chillers or freezers.
- The characteristics of odours associated with processes and materials. Incoming meat materials are at a grade which would be suitable for use in other food production processes.

We agreed with the applicant that the use of a benchmark of 3.0 OU_E/m^3 would be appropriate for their site specific scenario. We recognise that the choice of which benchmark to use is a judgement. We recognise that the descriptions of materials given do not fit neatly into either the most offensive or moderately offensive categories. We also recognise that, modelling of odour impacts is inherently uncertain and is particularly sensitive to the input of emission rates. We therefore requested that the applicant ensure that the emission rates should consider the worst case concentrations from any monitoring gathered. This would prevent the possible under prediction of impacts.

On receipt of the application, the applicant submitted an odour impact assessment supported by dispersion modelling. In addition to the above benchmark justification, the assessment uses the methodology outlined in our guidance; *H4 Odour Management*. The assessment report is titled:

- *Part A Environmental Permit Application: Odour Assessment Pets Choice, Blackburn*. Ref. 2534-S5-r2

The applicant's consultant used recognised modelling software ADMS 5.2 to predict odour impacts at sensitive receptors. The applicant modelled two scenarios; 1. Processes under the current extraction and abatement and 2. Processes under modified extraction and abatement systems (as per described in the above sections). The modified extraction and abatement arrangements are applied to the three AHUs.

As the site was already operational as a Part B installation, the applicant performed monitoring of the operational emission points. Sampled and monitored data was collected in line with BS EN 13725:2003 for the emission points; all ovens, packing extraction area outlet and the AHU3 outlet. For the monitored odour concentrations used in the model, the applicant used the monitored results for the two band ovens and rack ovens. For the AHU3, multiple monitored results were obtained and the applicant chose to use a geometric mean for the model input. For the emission concentrations used as an input for the proposed emission sources (AHU1, AHU2, wash room extraction points (including horizontal emissions) and the effluent treatment plant storage tanks), the monitored emissions were used as a baseline.

For the proposed and existing AHU outlets, the model input used the geometric mean multiplied by a factor of 1.25. This adjusted emission factor was proposed to account for the proposed Chub and retort cooking operations. As these processes take place in sealed vessels, we consider this to represent a reasonable worst case approach.

Emissions concentrations used for the wash rooms were based on similar sites within the pet food manufacturing industry. A former odour impact assessment is referenced for this emission concentration. In addition, the emissions from the effluent treatment plant storage tanks (for displaced air) were not quantified during the monitoring exercise as they are emitted via carbon filters. The applicant therefore used a conservative odour concentration of 2,000 OU_E/m^3 based on experience from other similar sites. Additional assumptions were made based on the total capacity of the tank air displacement and an efflux velocity of 0.0m/s were included in the model. We accept that these can be considered worst case for the purposes of the assessment. The operating envelope assumes operation everyday between 08:00h and 20:00h.

It should be noted that improvement condition 2 requires the operator to sample and analyse emissions after commissioning to ensure that emissions concentrations are not greater than those assumed within the model. Therefore, the Environment Agency is reassured that emissions will be verified against the concentrations used within the model.

The results from the modelled scenarios are outlined in the tables below:

Table 1 – Scenario 1 odour impacts. Maximum modelled impact at most sensitive receptor (R13)			
Pollutant	**Odour benchmark**	**Odour concentration**	
Unit	**ou_E/m^3**	**ou_E/m^3**	**% of odour benchmark**
Odour concentration	3	2.86	95

Table 2 – Scenario 2 odour impacts. Maximum modelled impact at most sensitive receptor (R13)			
Pollutant	**Odour benchmark**	**Odour concentration**	
Unit	**ou_E/m^3**	**ou_E/m^3**	**% of odour benchmark**
Odour concentration	3	1.92	64

Based on the above results, the applicant has demonstrated that emissions of odour from point sources are likely to be less than the benchmark in both scenarios. For scenario 2, the proposal to install modifications to the AHUs and improved activated carbon filter beds will help the applicant to achieve BAT. The applicant also modelled a greater operating envelope where operations would be continuous (24 hours a day, all year).

Table 3 – Scenario 2 odour impacts. Maximum modelled impact at most sensitive receptor (R13) (operating 24 hours a day, all year)			
Pollutant	**Odour benchmark**	**Odour concentration**	
Unit	**ou_E/m^3**	**ou_E/m^3**	**% of odour benchmark**
Odour concentration	3	2.25	75

As per H4, the applicant has considered uncertainty within their model and performed a series of sensitivity checks against possible variables; source of the meteorological data, various Monin-Obukhov lengths and building data.

We performed our own sensitivity checks on the ADMS modelling files and we found that:

- Our predictions are generally in agreement with the applicant.
- The highest impact (R13) and other sites within close proximity are commercial or industrial premises. These are generally considered to be less sensitive as outlined within our H4 guidance.
- For residential receptors, our checks and the applicant's result indicate that predicted impacts are likely to be less than 1 OU_E/m^3.
- The modifications proposed by scenario 2 will likely reduce odour impacts overall.

In addition, the applicant has assumed an efficiency of 80% for the proposed abatement system odour removal. The manufacturer indicates greater levels of efficiencies (up to 99% odour removal). It is therefore possible for point source odour impacts to be lower than that modelled.

Odour Assessment conclusions

When considering the combination of the applicant's proposal to improve the odour abatement systems, the submission of a new and robust odour management plant alongside the provision of indicative results from the odour impact assessment, the Environment Agency has confidence that the operator will have the ability to control and adequately minimise odour emissions.

Improvement conditions 1 – 3 specified within the permit require the operator to provide abatement system commissioning plans, sampling and monitoring verification of the abatement system and the long term development of a monitoring regime. These conditions will enable the Environment Agency to verify the assumptions in the application and work with the operator on any improvements that will need to be made to apply greater control measures.

Air quality

This permit allows the combustion of natural gas in boilers and ovens in order to facilitate the production of cooked pet foods at Pets Choice. The combustion sources consist of one steam rising boiler (5 MWth), 2 band ovens (0.25 MWth each) and 3 rack ovens (0.35 MWth each). To assess the impact on air quality from these point sources, the applicant performed a quantitative air quality impact assessment with air dispersion modelling. It should be stated that no emission limits were set for the boiler under the requirements of the Medium Combustion Plant Directive. The boiler has been in operation at the site prior to the relevant date (20th December 2018) and is therefore considered to be an existing medium combustion plant. The operator will need to comply with the relevant emission limit by 1st January 2024.

A methodology for risk assessment of point source emissions to air is set out in our guidance Air emissions risk assessment for your environmental permit.

The applicant's air dispersion model used the recognised software ADMS (version 5.2). The assessment is presented in the report, *Part A Environmental Permit Application: Air Quality Assessment. Pets Choice, Blackburn* (Ref. 2534-S7-r1). Emissions from the ovens and boiler were assumed to be constant (24 hours per day, 365 days per year). The operator states that this is a worst case scenario as plant shut-down periods and periods of lower production are not reflected in modelled emissions. There are 11 emission points from the boiler and ovens.

Impact on human receptors

The site is located in an industrial and commercial setting in Blackburn with the closest receptors close proximity being commercial or industrial locations. The applicant has assessed the impact from oxides of nitrogen. We have presented the predicted process contributions at the most impacted sensitive receptor (R13 JRT - commercial). These results are presented in Table 3.

Table 3 – Predicted impacts at most sensitive human receptor (R13 JRT - commercial).

All plant fuelled on natural gas.

Pollutant	**Environmental standard**	**Background**	**Process Contribution (PC)**		**Predicted Environmental Concentration (PEC)**	
Unit	**µg/m^3**	**µg/m^3**	**µg/m^3**	**% of Environmental standard**	**µg/m^3**	**PEC % of Environmental standard**
NO_x annual mean	40	13.49	3.32	8.3	16.81	42
NO_x hourly mean	200	26.98	27.94	14	54.92	27.46

Emissions from the modelled oxides of nitrogen show that impacts at the most impacted sensitive receptor (R13) cannot be considered to be insignificant for long term impacts as PCs are greater than the assessment criteria of 1% of the environmental standard. However, long term PECs are less than the environmental standard (less than 100% of the environmental standard) to indicate that emissions will not be significant.

Modelled short term impacts at R13 cannot be considered to be insignificant for short term impacts as process contributions are greater than the assessment criteria of 10% of the environmental standard. However, short term PECs are predicted to be less than the short term environmental standard (less than 100% of the environmental standard) to indicate that emissions will not be significant.

Predicted impacts at ecological receptors

The operator's assessment includes a section outlining the potential impact on ecological receptors. It concludes that there are no relevant ecological or habitats sites within the screening distances as outlined below:

- European sites; Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites within 10km of the facility.
- Sites of Special Scientific Interest (SSSIs), National Nature Reserves, Local Nature Reserves and Ancient Woodland (AW) within 2km of the facility.

We have checked the location of the site and proximity to sensitive ecological receptors. While we agree that there are no European protected sites, the operator has not identified that there is one Local Wildlife Site within 2km of the installation; Parsonage Reservoir. Parsonage Reservoir is a water body without associated protected habitat. Water bodies are less likely to be impacted from the impacts from atmospheric NOx,

airborne nitrogen deposition and acidification, we are therefore satisfied the site will not be impacted by emissions from the proposal.

Conclusions

We have performed an audit of the operator's dispersion modelling and agree with their conclusions. We can therefore conclude that impacts from the operation of the boiler and ovens will not be significant.

Decision checklist

Aspect considered	Decision
Receipt of application	
Confidential information	A claim for commercial or industrial confidentiality has not been made.
Identifying confidential information	We have identified information provided as part of the application that we consider to be confidential.
Consultation	
Consultation	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. We consulted the following organisations: • Public Health England • Health & Safety Executive • United Utilities • Local Planning Authority – Blackburn with Darwen Borough Council • Environmental Health – Blackburn with Darwen Borough Council • Food Standards Agency The comments and our responses are summarised in the consultation section.
Operator	
Control of the facility	We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.
The facility	
The regulated facility	We considered the extent and nature of the facility 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.
The site	
Extent of the site of the	The operator has provided a plan which we consider is satisfactory,

Aspect considered	Decision
facility	showing the extent of the site of the facility. The plan is included in the permit.
Site condition report	A site condition report was submitted which described the condition of the ground. However, the operator has specified that further ground investigations via intrusive sampling will be undertaken in order to fully determine the levels of existing ground contamination. We have communicated to the operator that without the full ground investigation that at the time of permit surrender, it will be their responsibility to fully remediate any ground contamination before we could accept that the ground to be in a satisfactory state. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.
Biodiversity, heritage, landscape and nature conservation	The application site is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat. 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. We consider that the application will not affect any sites of nature conservation, landscape and heritage, and/or protected species or habitats identified.
Environmental risk assessment	
Environmental risk	We have reviewed the operator's assessment of the environmental risk from the facility. The operator's risk assessment is satisfactory.
Climate change adaptation	We have assessed the climate change adaptation risk assessment. We consider the climate change adaptation risk assessment is satisfactory. We have decided to include a condition in the permit requiring the operator to review and update their climate change risk assessment over the life of the permit.
Operating techniques	
General operating techniques	We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility. The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit. The operator completed an assessment of the site operations against the relevant BAT conclusions specified within the BAT reference document (BREF), *Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries*.
Operating techniques for	Emissions of oxides of nitrogen cannot be screened out as insignificant.

Aspect considered	Decision
emissions that do not screen out as insignificant	We have assessed whether the proposed techniques are BAT. The proposed techniques/emission levels for emissions that do not screen out as insignificant are in line with the techniques and benchmark levels contained in the technical guidance and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and ELVs deliver compliance with BAT-AELs. More detail is provided within the key issues section of this decision document.
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 satisfactory. More detail is provided within the key issues section of this decision document.
Permit conditions	
Raw materials	We have not specified limits and controls on the use of raw materials and fuels.
Improvement programme	Based on the information on the application, we consider that we need to impose an improvement programme. IC4 is set in the permit which requires the operator to submit an Energy Efficiency Plan in line with BAT 6 of the *BAT conclusions for the food, drink and milk industries*. This aspect of the applicant's assessment against the BAT conclusions was not able to be completed during the application stage. More detail is provided within the key issues section of this decision document.
Emission limits	We have decided that emission limits are not required in the permit. The boiler plant is considered to be an existing medium combustion plant and therefore, the emissions do not need to comply with the relevant ELV until 1st January 2029 as per the requirements under the Medium Combustion Plant Directive.
Reporting	We have not specified reporting in the permit.
Operator competence	
Management system	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. The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.
Relevant convictions	The Case Management System has been checked to ensure that all relevant convictions have been declared.

Aspect considered	Decision
	No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.
Financial competence	There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	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. Paragraph 1.3 of the guidance says: "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." 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. 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.

Consultation

The following 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.

Responses from organisations listed in the consultation section

Response received from
Public Health England
Brief summary of issues raised
Public Health England raised concerns regarding the potential odour impacts but contended that emissions have been adequately addressed within their OMP. Also raised was the absence of air dispersion modelling as PCs of NO_2, were shown to be greater than 20% of the PC within the operator's H1 risk assessment.
Summary of actions taken or show how this has been covered
We have assessed the operator's OMP, odour assessment and proposed abatement system and conclude that the measures specified by the operator are likely to minimise odour. On that basis, we also consider the measures to be BAT. The permit also includes improvement conditions requiring the operator to verify the effectiveness of the odour abatement systems and to remediate any issues identified during these reviews. The operator supplied air dispersion modelling for their combustion plant on site. We assessed the impacts on human and ecological receptors. We concluded that there will be no significant emissions against the relevant environmental standards.

No written representations were made by the following organisations; the Health & Safety Executive, United Utilities, Blackburn with Darwen Borough Council and the Food Standards Agency.

No written representations were made by members of the public in response to the publication of the application and supporting information on GOV.UK.