

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Factory Services UK Limited

Factory Services UK Limited trading as SugaRich
Biddlesden Road
Westbury
Nr Brackley
Northants
NN13 5JL

Variation application number

EPR/LP3434TX/V002

Permit number

EPR/LP3434TX

Factory Services UK Limited trading as SugaRich

Permit number EPR/LP3434TX

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

The Factory Services UK limited trading as SugaRich site on Biddlesden road is a Section 6.8 Part A(1)(d)(ii) activity "Treating and processing materials intended for the production of food products from vegetable raw materials at plant with a finished product production capacity of more than 300 tonnes per day (average value on a quarterly basis)".

The installation is located at Factory Services UK Limited trading as SugaRich, Biddlesden Road, Westbury, Brackley, Buckinghamshire. The Site is centred at National Grid Reference 462560, 236510. The surrounding land use is predominantly open agricultural land and some residential housing. The nearest local residents are situated in an area of housing 300m to the west of the site. Approximately 500m to the south-west is residential housing situated within the village of Westbury.

The installation processes downgraded food products from a range of sources, which include breakfast cereals, confectionery, snacks and bakery produce along with other unprocessed materials (e.g. wheat meal), into a consistent material which is sold as a raw material for the manufacture of compound animal feed.

The site produces approximately 125,000 tonnes per annum of downgraded food product blend. The main activities conducted on site include receipt, storage and handling of raw materials, drying, mixing, milling and final dispatch of product.

Bulk raw materials are received on site either in dry, wet or packaged form and are stored in dedicated storage areas. Wet raw materials are dried in a rotating drying drum in a direct flow of hot air generated by a natural gas-fired on-site burner which exits the cyclones at approximately 90°C. The dried product is conveyed to a sieve via an enclosed system, and mechanically pushed through the sieve to ensure a homogeneously sized material. Dried product is removed from the exhaust gases via primary and secondary cyclones and the exhaust air is dispersed via a 14m stack.

All dry raw materials are then blended into batches using front-end loaders before it is mixed by tractor mixer. The combined mix is subsequently mashed/pulverised in one of two milling areas where the product is finally pushed through a series of bar screens followed by a vibrating screen with a suction system to ensure the homogeneity of the finished product and remove excess paper and plastic.

The primary sources of emissions to air are from the cyclone stack and the diesel storage tank breather vents. The principal pollutants from the dryer and gas burner (via the cyclone stack) are combustion gases (NO_x and CO), particulate matter and water vapour. The burner has a thermal capacity of 12.3MWth input and is fired on natural gas. The burner undergoes regular burner efficiency and maintenance checks.

The main wastes from the process are scrap metal and cardboard which are collected and recycled; wooden pallets which are returned to the supplier for reuse and unusable product and packaging from raw materials which is stored in a skip fitted with a lid to prevent dust emissions.

The installation is party to a Climate Change Agreement (CCA).

This variation application has altered the nature of emissions to surface water from the site. The site has replaced the previous water storage lagoon for wash waters and site surface drainage. A new lagoon is being put in place which is fed by site surface run off via a class 1 interceptor; site skip wash water and a small biodigester for domestic foul water from the office building and welfare facilities at a 1m³ daily flow. The lagoon has a capacity of 1170m³, it drains to a drum screen to remove solids and then to a reed bed treatment matrix. This system removes the relevant pollutants via filtration and bacterial action and discharges to an adjacent drainage ditch at a maximum volume of <50m³ a day, this ultimately then flows to the Great River Ouse.

The schedules specify the changes made to the permit.

We consider that in reaching our decision to vary the permit we have taken into account all relevant considerations and legal requirements. We are satisfied that the permit will ensure that a high level of protection is provided for the environment and human health and that the activities will not give rise to any significant pollution of the environment or harm to human health.

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

Status log of the permit		
Description	Date	Comments
Original permit determined TP 3632 SZ (Superseded AVDC/EPA/18)	31/03/2006	Permit issued to Tramar D&M Ltd for a food processing facility producing raw materials for animal feed.
Transfer determined EPR/LP3434TX/T001	14/05/2010	Permit transferred to Factory Services UK limited.
Application EPR/LP3434TX/V002 (variation and consolidation)	Duly made 28/10/2020	Application to vary and update the permit to modern conditions adding a reed bed treatment system for site effluent and a discharge to surface water.
Additional information provided	18/12/2020	Noise management plan, Odour management plan and emergency plans incorporating new lagoon provided.
Variation determined and consolidation issued EPR/LP3434TX	02/02/2021	Varied and consolidated permit issued in modern format.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/LP3434TX

Issued to

Factory Services UK Limited (“the operator”)

whose registered office is

Unit 8 Minster Court

Tuscam Way

Camberley

Surrey

GU15 3YY

company registration number 05383180

to operate a regulated facility at

Factory Services UK Limited trading as SugaRich

Biddlesden Road

Westbury

Nr Brackley

Northants

NN13 5JL

to the extent set out in the schedules.

The notice shall take effect from 02/02/2021

Name	Date
Maxine Evans	02/02/2021

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/LP3434TX

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/LP3434TX/V002 authorising,

Factory Services UK Limited (“the operator”),

whose registered office is

Unit 8 Minster Court

Tuscam Way

Camberley

Surrey

GU15 3YY

company registration number 05383180

to operate an installation at

Factory Services UK Limited trading as SugaRich

Biddlesden Road

Westbury

Nr Brackley

Northants

NN13 5JL

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

Name	Date
Maxine Evans	02/02/2021

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.

3 Emissions and monitoring

3.1 Emissions to water, air or land

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

- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

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

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.4 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.

3.5 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 and S3.2;
 - (b) process monitoring specified in table S3.3;
- 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 and S3.2 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.

3.7 Fire prevention

3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.

3.7.2 The operator shall:

- (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
- (b) implement the fire prevention 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 For the following activities referenced in schedule 1, table S1.1 a report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production /treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4 ; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.
- 4.2.5 Within 1 month of the end of each quarter, the operator shall submit to the Environment Agency using the form made available for the purpose, the information specified on the form relating to the site and the waste accepted and removed from it during the previous quarter, if during that quarter the total amount accepted exceeds 100 tonnes of non-hazardous waste or 10 tonnes of hazardous waste.

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 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

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 Part A(1)(d)(ii)	Production of a raw material to be sold for the manufacture of compound animal feed by processing (drying, milling and blending) downgraded food products.	Processing up to 130,000 of vegetable raw material per annum. Including operation of a 12.3 MWth natural gas fired burner in order to dry wet raw materials comprising of rape seed meal, wheat feed meal, bread, dough, cake, breakfast cereals, biscuits, chocolate, cocoa shells, sugar lines (e.g. boiled sweets), crisps, maize snacks and potato peel.
Directly Associated Activity			
AR2	Raw materials storing and handling	Handling and storing raw materials.	From receipt of raw materials to their use in the process.
AR3	Product handling and storage	Handling and storage of product.	From end of processing to dispatch from site.
AR4	Hygiene and cleaning operations	Cleaning and sanitising of equipment and production areas.	From requirement for cleaning to readiness for re-use for production.
AR5	Waste storage and handling	Storage and handling of wastes.	From generation to removal from site for recovery or disposal.
AR6	Storage and use of chemicals	Storage and use of chemicals for cleaning of operational plant and raw material skips.	Receipt, storage and use of chemicals.
AR8	Cyclones	Operation of primary and secondary cyclones to clean exhaust air from process.	From treatment of exhaust air from rotating drying drum to discharge of air.
AR9	Waste water storage and settlement lagoon	Storage of waste water derived from site surface water run off via class one interceptor, wash water from the cleaning of skips and domestic foul water from a biological treatment system for the site offices and welfare facilities prior to discharge into the reed bed system via a drum screen.	From production and collection of site waste water and surface water run off to storage within the settlement lagoon and discharge into the reed bed treatment system via a drum screen.
AR10	Reed bed waste water treatment system	Effluent treatment comprising of filtration and	Treatment of water derived from site surface water run

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
		biological breakdown of pollutants by bacteria during horizontal flow through a reed bed matrix.	off via class one interceptor, wash water from skip cleaning on site and domestic foul water from the biological treatment system for site office and welfare facilities to discharge into surface water drain. Daily discharge volume shall not exceed 50m ³ .

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	The response to questions 2.1 and 2.2 given on pages 22-56 of the application	31/03/2005
Response to request for further information	The response to request for further information on emissions of odours, noise and the current drainage proposals dated 20/06/2005.	15/07/2005
Response to request for further information	Supporting information submitted in response to request for further information dated 04/12/2020: <ul style="list-style-type: none"> • Email response dated 18/12/2020 points 2, 3 and 4. • Documents referenced: <ul style="list-style-type: none"> ○ Odour management OP – 18 Issue date 11/03/19; ○ Noise management OP – 19 Issue date 11/03/19; ○ Site Emergency & Incident Plan for SugaRich Brackley v3 dated 15.12.20; and ○ Emergency Plan OP – 13 Issue date 11/03/19. 	18/12/2020

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	The Operator shall prepare and submit a written Noise Management Plan in accordance with the requirements given in the Agency's Horizontal Guidance Note IPPC H3 (Part 2) – Noise Assessment and Control for the approval of the Agency. A firm timetable for the implementation and periodic review of this document shall be included in the plan. The plan shall be implemented by the Operator from the date of written approval by the Agency	Complete
IC2	Specified Noise Reduction The Operator shall assess and provide the Agency with a written report into options to reduce the noise from the Fan outlet, External Cyclone and Motor and Mill 2 identified as S1, S3 and S5 respectively in the noise	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>survey, in order that the noise levels beyond the site boundary reduced to a level below which complaints are likely to occur as identified in Agency's Horizontal Guidance Note IPPC H3.</p> <p>The report shall identify the improvement actions to be completed together with a timetable for their implementation and shall show clearly how compliance with the objective (that noise levels beyond the site boundary are maintained at a level below which complaints are likely to occur) will be validated. All improvements identified shall be scheduled for completion within 9 months of issue of the permit.</p>	
IC3	<p>Containment Measures</p> <p>The Operator shall inspect all drains, surfacing and containment measures on site. This shall include, but not be limited to:</p> <ul style="list-style-type: none"> - Providing a map showing locations of all hardstanding with a full set of data on all hardstanding against the indicative BAT requirements given in Agency Technical Guidance Note IPPC H7 - Guidance on the protection of land under the PPC regime. - Details of any areas of hardstanding in a poor state of repair, especially those where processing or storage and handling of liquids takes place. - Details of any areas of unmade ground used for storage. - Details of all unbunded fill points. - Checks for storage of chemicals, detergents/santizers, oil, waste oil, and diesel against the indicative BAT requirements given in Box 5 of Technical Guidance Note H7, Version 1, August 2003 and Agency Guidance Note IPPC S6.10. - Identifying control measures and procedures needed to prevent / minimise spills in the workshop area. - Identifying which bulk storage tanks & bunds require protection against vehicle movements. - Details of inspection and maintenance procedures. - Identifying any overflows from tanks (including cess pits) that are not alarmed and/or are routed to an area that is unbunded / uncontained. <p>The Operator shall submit a written report within 3 months of permit issue for the approval of the Agency which summarises the inspection findings and sets out any proposals for improvements with timescales necessary to meet the requirements of section 2.2.5 of the Agency Guidance Note IPPC S6.10.</p> <p>All improvements identified shall be completed within 12 months of permit issue.</p>	Complete
IC4	<p>Odour Management Plan</p> <p>The Operator shall submit a written odour management plan to the Agency for approval describing how they will manage operations to reduce odour emissions from the dryer and wet material storage and handling operations in order that odour levels beyond the site boundary are free from offensive odour as perceived by an Authorised Officer of the Agency.</p> <p>This shall be in accordance with Agency Technical Guidance Note H4: Horizontal Guidance for Odour and "Odour Assessment and Control -</p>	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>Guidance for Regulators and Industry" and include but not be limited to the following procedural and other improvements:</p> <ul style="list-style-type: none"> - Improvements to recording of complaints. - Improvements to investigations into complaints. - Improvements to systems for tracking that actions identified from the complaint investigation that could prevent future repeat complaints have been completed in a timely manner. - Other Improvements - Improvements to operating techniques which are employed under normal conditions e.g. raw material selection. - Improvements to measuring and recording meteorological data (wind speed and direction). - Consideration of automatic interlocks to prevent operation of the dryer if the wind is in the directions specified in Table 2.1.11. - The techniques and frequency by which odour levels beyond the site boundary will be monitored. <p>Procedural improvements shall be completed within 3 months. A written report shall be submitted for the approval of the Agency confirming that this is the case and also shall include proposals with a firm timescale for any other improvement actions to be completed.</p>	
IC5	<p>Site Closure Plan</p> <p>The Operator shall develop a written Site Closure Plan with regard to the requirements set out in Section 2.11 of the Agency Guidance Note IPPC S6.10, August 2003. Upon completion of the plan a summary of the document shall be submitted for the approval of the Agency.</p>	Complete
IC6	<p>Dryer Emissions Modelling</p> <p>The Operator shall undertake an air dispersion modelling exercise in order to assess the fate of emissions (particulates, odour and moisture laden plume) from the drying process.</p> <p>This shall include monitoring of particulate releases at normal and worst case conditions. Odour emission concentrations shall be measured by olfactometric testing, and shall include consideration of the worst case emissions scenario (e.g. maximum production level, most odorous raw materials). The modelling shall be carried out using a suitable air dispersion model. The results shall be used to revise the environmental impact assessment of releases from the installation in accordance with Agency Horizontal Guidance Note H1: Environmental Assessment and Appraisal of BAT and Agency Technical Guidance Note H4: Horizontal Guidance for Odour.</p> <p>After assessing the results of the modelling exercise the Operator shall consider techniques to improve the stack discharge through abatement and / or improving dispersion of particulates & odour so that they are insignificant at local receptors. The Operator shall also consider options to reduce the visibility of the plume.</p> <p>The Operator shall submit a written report within 6 months of permit issue for the approval of the Agency including a summary of the results of the modelling, the improvement options that have been considered, proposed improvements and a timescale for implementation of any improvements identified.</p>	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	The report shall be implemented by the Operator from the date of written approval by the Agency	
IC7	<p>Landspreading Option</p> <p>The Operator shall review the proposal for landspreading as an option for the effluent generated on site and stored in the lagoon in accordance with the requirements set out in section 2.6 of the Agency Guidance Note IPPC S6.10. The Operator shall submit a written report to the Agency for approval of its proposals for dealing with effluent stored in the lagoon.</p> <p>The report shall be implemented by the Operator from the date of written approval by the Agency.</p>	Complete
IC8	<p>Reducing Fugitive Dust Emissions</p> <p>The Operator shall review the techniques employed on site to prevent the release of fugitive particulate emissions. The assessment shall in particular consider use of additional techniques to reduce dust emissions from blending, milling and conveyance of raw materials around the permitted installation and shall take into account the requirements of Section 2.2.4 of the Agency Guidance Note IPPC S6.10, August 2003. The techniques considered shall include, but not be limited to:</p> <ul style="list-style-type: none"> - Enclosure and Local exhaust ventilation (LEV) at areas where dust is generated to have suitable abatement and dispersion to minimise the release and environmental impact of fugitive dusts (e.g. for both mills etc). - Suitable alternatives to use of the roller doors or measures to ensure the roller doors are used effectively to provide an enclosed building and so minimise the release of fugitive dusts. - Negative air flow from the blending and wet storage sheds (identified as sheds 1 and 4 on the site plan to schedule 5 of this permit) with exhaust air to have suitable abatement and dispersion to minimise the release and environmental impact of fugitive dusts. - Adequate fully enclosed storage capacity for dry raw materials at all times (including during abnormal operations when current raw material sheds are filled to capacity). - Adequate inspection and maintenance to ensure the integrity of the sheds - Use of enclosed transfer systems for dry materials. - Review of techniques available for blending that minimise fugitive releases of dust. - Review of the current blending operation to identify areas to reduce fugitive releases. <p>The Operator shall submit a written report to the Agency for approval including the techniques considered, the improvements identified and a timescale for implementation of the improvements identified.</p> <p>The report shall be implemented by the Operator from the date of approval by the Agency.</p>	Complete
IC9	<p>Reducing Fugitive Odour Emissions</p> <p>The Operator shall review the techniques employed on site to prevent the release of fugitive odour emissions. The assessment shall in particular consider the options to reduce the odorous emissions from the storage of wet raw materials. The techniques considered shall include but not be limited to:</p>	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<ul style="list-style-type: none"> - Suitable alternatives to use of the roller doors, or measures to ensure the roller doors are used effectively to minimise fugitive odours. - Negative air flow from the blending and wet storage sheds (identified as sheds 1 and 4 on the site plan to schedule 5 of this permit) with exhaust air to have suitable abatement and dispersion to minimise the release and environmental impact of fugitive dusts and odour. - Adequate fully enclosed storage for wet raw materials at all times (including during abnormal operations when the current raw material storage sheds are filled to capacity). - Adequate inspection and maintenance to ensure the integrity of the sheds. <p>The Operator shall submit a written report to the Agency for approval including options considered, improvements identified and a timescale for implementation of any improvements identified.</p> <p>The report shall be implemented by the Operator from the date of approval by the Agency</p>	
IC10	<p>Vehicle Washing</p> <p>A written plan shall be submitted to the Agency for approval detailing the results of a review of vehicle-washing activities carried out on site to minimise the risk of pollution of surface water and groundwater and any improvements identified. The plan must propose an alternative to soakaway for disposal of vehicle wash water and shall consider containment and disposal of effluent, and options for recycling wash waters.</p> <p>The plan shall be implemented by the Operator from the date of approval by the Agency.</p>	Complete
IC11	<p>Site Drainage Proposals</p> <p>The Operator shall conduct an options appraisal of the proposed techniques for treatment and disposal of process effluent arising from the installation to determine the Best Available Techniques to prevent and minimise pollution. The assessment should be carried out in accordance with IPPC Horizontal Guidance Note H1: Environment Assessment and Appraisal of BAT.</p> <p>This shall include, but not be limited to:</p> <ul style="list-style-type: none"> - All areas where there is the potential of surface run-off with a high biological oxygen demand shall be directed to the onsite Lagoon via an interceptor - All vehicle washing wastewater to the lagoon - An assessment that the lagoon is a suitable treatment method for the sites wastewater. - Installation of oil/water separation devices where there is the risk of hydrocarbon spills. - Consideration of alternative disposal techniques for wastewater e.g. foul sewer connection or alternative suitable measures. - In making the assessment, the operator shall have regard to the requirements set out in Section 2.2 of the Agency Guidance Note IPPC S6.10. 	Complete

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<p>The written report of the appraisal, the conclusions arrived at and an implementation plan with timescales for any identified improvements shall be submitted for the approval of the Agency.</p> <p>The report shall be implemented by the Operator from the date of approval by the Agency.</p>	
IC12	<p>Revised Noise Management Assessment</p> <p>Following the implementation of the specific noise reduction measures in IC2, the Operator shall submit a revised noise monitoring assessment to the Agency for approval in accordance with standards identified in the Agency's Horizontal Guidance Note IPPC H3 (Part 2) – Noise Assessment and Control. This should:</p> <ul style="list-style-type: none"> - Include details and analysis of all noise complaints received before and after completion of IC2. - Quantify the level of noise at the installation boundary and the nearby receptors. - If noise levels at receptors are still above those expected to prevent complaints of noise, remaining sources of noise contributing to noise off-site should be identified. - For any additional noise sources identified, detail options for reduction of that noise. - Make recommendations on future requirements for noise assessment. <p>Any measures identified in the assessment for reducing noise from the Installation and any requirements for future noise assessment shall be implemented from the date of approval by the Agency.</p>	Complete

Schedule 2 – Raw materials and fuels

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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
Emission point 1 on site plan in schedule 7	Stack from drying plant via Cyclones	Particulate matter	50 mg/m ³	Average over the sampling period	Annually	BS EN 13284-1

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency (2)	Monitoring standard or method
Emission point 2 on site plan in schedule 7 to drainage ditch and Great River Ouse.	Discharge from reed bed treatment system	Total Suspended Solids	30 mg/l	24-hour flow proportional sample	Daily	BS EN 872
		Biochemical Oxygen Demand (BOD)	20 mg/l		Monthly	EN 1899-1
		Total Nitrogen	10 mg/l		Daily	EN 12260, EN ISO 11905-1
		Total Phosphorous	--		Daily	EN ISO 15681-1 and -2, EN ISO 6878, EN ISO 11885
		Total Organic Carbon (TOC) (1)	--		Daily	EN 1484
		Chemical Oxygen Demand (COD) (1)	--		Monthly	--
		Chloride	--		Monthly	Various EN standards available (e.g. EN ISO 10304-1, EN ISO 15682)
		Volume	<50m ³ /day		Total daily volume	Monthly

(1) TOC monitoring and COD monitoring are alternatives. TOC monitoring is the preferred option because it does not rely on the use of very toxic compounds.

(2) If the emission levels are proven to be sufficiently stable, a lower monitoring frequency can be adopted but in any case at least once every month.

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Installation	Period of drying activity	Ongoing	The Operator shall record the start-up and shutdown of the dryer.	--
Installation	Wind direction and speed	Continuous	Automatic recording weather station ^{Note 1}	Wind speed shall be expressed as a 5 minute mean.

Note 1: During periods when the specified monitoring method is unavailable a suitable alternative method may be used if first agreed in writing with the Agency.

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
Emissions to air Parameters as required by condition 3.5.1.	Emission point 1	Every 12 months	1 January
Emissions to water Parameters as required by condition 3.5.1	Emission point 2	Every 6 months	1 January, 1 July

Table S4.2: Annual production/treatment	
Parameter	Units
Production of downgraded food product blend	tonnes
Effluent discharged	m ³

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Energy usage	Annually	MWh
Water Usage	Annually	m ³
Total raw material used	Annually	tonnes

Table S4.4 Reporting forms		
Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Environment Agency	02/02/2021
Water	Form water 1 or other form as agreed in writing by the Environment Agency	02/02/2021
Water usage	Form water usage 1 or other form as agreed in writing by the Environment Agency	02/02/2021
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	02/02/2021
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	02/02/2021
Operation of dryer and meteorological conditions	Form Met1 or other form as agreed in writing by the Environment Agency	31/03/06

Schedule 5 – Notification

These pages outline the information that the operator must provide.

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

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

Part A

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

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

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

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
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.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

“emissions to land” includes emissions to groundwater.

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

“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 or background concentration 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.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

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

Pests” means Birds, Vermin and Insects.

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

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



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END OF PERMIT