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## Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Wrights Pies (Shelton) Limited

Wrights Pies Weston Road Crewe Cheshire CW1 6XQ

#### Permit number

EPR/TP3903PE

# Wrights Pies Permit number EPR/TP3903PE

### Introductory note

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

The main features of the permit are as follows.

This permit allows Wrights Pies (Shelton) Limited to produce savoury products, ready meals, confectionary and bread under a Section 6.8 Part A(1)(d)(iii) scheduled activity.

The Wrights Pies facility is located in Crewe, Cheshire, and occupies an area of approximately 7.86 acres.

There are cooking and baking processes undertaken on-site. Cooking involves the use of a steam injection vessel. The products in the vessel are cooked to the required temperature and cooled before being used on the production lines. Ready meals are produced within a cooking vessel and then transferred to the various process lines. A pro-seal line produces the finished product in trays, ready to heat and eat. Multivac machinery produces product in pouches ready to heat and eat. All the ready meal products are spiral frozen and packaged for distribution to customers.

The baking of products is undertaken for baked distribution. Baking of product is based from a low care environment through the ovens into high risk and high care areas. In these areas, the product is chilled within four hours of baking to comply with food safety guidelines.

The production of bread is carried out in the cakes building. The required recipe is mixed, then the dough is transferred to the König forming plant. Here, the dough is rested and shaped to the required bread shape. The moulded product is then placed on trays and transferred to proofers. The proofer stage is completed under temperature and humidity controls and this takes about six hours to complete. After this, the product is transferred to the deck oven, baked and cooled ready for packaging and dispatch.

Confectionary products are produced in machinery, ranging from small range kitchen machinery to industrial sized plant including fryers. In some of the processes, product is decorated by hand. Once formed, the products are packaged either through flow wrapping or boxed at ambient temperature or frozen.

There are two flour silos on site and both have a maximum capacity of 30 tonnes.

The site operates various ammonia-based refrigeration units that supply the process equipment. Refrigeration systems are part of a service contract.

Process effluent from the cakes building is treated via an onsite dissolved air flotation (DAF) plant. The plant has a capacity of <2 m³ per hour. The process is automated and the facility is located on hard standing. Wastewater from the cakes building is collected in a balancing tank, then pumped through a sieve, black water tank and DAF plant, before discharging to the Crewe Wastewater Treatment Works (WwTW) via foul sewer. Untreated process effluent from the main factory also discharges to foul sewer. Vehicle washing is undertaken at the site and there are five jet washing stations. High pressure jets clean delivery vehicles with detergent and hot water – the wastewater from this activity drains to foul sewer. There are a total of fifteen discharge points to foul sewer which are consented by United Utilities – the sewage undertaker.

Heat, steam and hot water supply are provided by three natural gas fired boilers. Two of these are rated 1.47 MWth input and the third is rated 1.29 MWth input – giving an aggregated input capacity of 4.23 MWth. There are a total of fifty two point source emissions to air including exhaust stacks from the site's three natural gas fired boilers, and vents from the natural gas fired ovens.

The closest human health receptors are located approximately 450 m north of the facility on Crewe Road. There are two Ramsar sites and one Special Area of Conservation within 10 km and two Local Wildlife Sites within 2 km of the installation.

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

| Status log of the permit   |                       |  |  |  |  |  |
|--|-----------------------|--|--|--|--|--|
| Description  | Date                  | Comments   |  |  |  |  |
| Application EPR/TP3903PE/A001  | Duly made<br>19/05/20 | Application for a new bespoke food and drink installation.   |  |  |  |  |
| Responses to the first Schedule 5<br>Notice, dated: 27/07/20         | 21/09/20              | Additional information received regarding the risk assessments, emissions to sewer, best available technique (BAT) assessment, effluent treatment plant (ETP), re-fuelling arrangements, accident management plan, drainage plans, emissions to air and site condition report (SCR). |  |  |  |  |
| Responses to the second<br>Schedule 5 Notice, dated:<br>23/10/20     | 08/12/20              | Additional information received regarding the risk assessments, emissions to sewer, BAT assessment, diesel tank and SCR.   |  |  |  |  |
| Responses to the third Schedule 5 Notice, dated: 06/01/21            | 02/02/21              | Additional information received regarding the SCR.   |  |  |  |  |
| Permit determined<br>EPR/TP3903PE<br>PAS billing reference: TP3903PE | 17/03/21              | Permit issued to Wrights Pies (Shelton) Limited.   |  |  |  |  |

End of introductory note

### **Permit**

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

#### **Permit number**

#### EPR/TP3903PE

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

Wrights Pies (Shelton) Limited ("the operator"),

whose registered office is

Weston Road Crewe Cheshire

**CW1 6XQ** 

company registration number 00526954

to operate an installation at

Wrights Pies Weston Road Crewe Cheshire CW1 6XQ

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

| Name           | Date     |
|----------------|----------|
| Claire Roberts | 17/03/21 |

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.
- 3.3.2 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 and S3.2.
- 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.

#### 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 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 Ac      | Table S1.1 Activities                               |   |  |  |  |  |  |  |
|--------------------|---|---|--|--|--|--|--|--|
| Activity reference | Activity listed in Schedule 1 of the EP Regulations | Description of specified activity   | Limits of specified activity   |  |  |  |  |  |
| A1                 | Section 6.8 Part A(1)(d)(iii)                       | Treatment and processing, other than exclusively packaging, of animal and vegetable raw materials (other than milk only), both in combined and separate products, whether previously processed or unprocessed, intended for the production of food. | From the receipt of raw materials, to the production of savoury products, ready meals, confectionary and bread to subsequent dispatch of finished packaged products off-site.  |  |  |  |  |  |
|                    | Directly Associated Activity                        | /   |  |  |  |  |  |  |
| A2                 | Heat, steam and hot water supply                    | Operation of 3 x natural gas fired boilers (2 x 1.47 MWth and 1 x 1.29 MWth) giving an aggregated input capacity of 4.23 MWth.  | From the receipt of natural gas as a fuel, to the emission of combustion gases to atmosphere.  |  |  |  |  |  |
| A3                 | Effluent treatment plant                            | Treatment of process effluent from the cakes building via an on-site DAF plant.   | From the generation of process effluent, to its discharge to foul sewer via emission point E2 – in accordance with the trade effluent consent issued by United Utilities.  Treatment plant to be located on a hard standing surface.  Daily treatment capacity not |  |  |  |  |  |
| A4                 | Refrigeration plant                                 | Operation of ammonia-<br>based refrigeration units for<br>spiral freezing and frozen<br>distribution storage.   | to exceed 50 m <sup>3</sup> .  From the chilling of finished products produced at the installation, to their dispatch off-site.  |  |  |  |  |  |
| A5                 | Product packaging                                   | Operation of five packaging areas and associated plant.   | From the receipt of packaging materials, to the dispatch of packaged products off-site.  |  |  |  |  |  |
| A6                 | Fuel storage  | Storage of fuel in 1 x 40,000 litre underground storage tank, 1 x above ground 5,000 litre tank and 1 x 1,500 litre above ground storage tank.  | From the receipt of white diesel, red diesel and AdBlue, to their subsequent use on-site.  |  |  |  |  |  |
| A7                 | Vehicle washing                                     | Operation of five jet washing stations for the cleaning of delivery vehicles.   | From the receipt of cleaning products, to the discharge of contaminated wash waters to foul sewer – in accordance with the trade effluent consent issued by United Utilities.  |  |  |  |  |  |

| Table S1.1 Activities |   |  |   |  |  |  |  |
|-----------------------|---|--|---|--|--|--|--|
| Activity reference    | Activity listed in Schedule 1 of the EP Regulations | Description of specified activity  | Limits of specified activity  |  |  |  |  |
| A9                    | Storage and handling of waste materials             | Handling, storage, transfer and dispatch of waste from the listed activities and directly associated activities.                   | From the generation of waste, to the off-site disposal of waste.  |  |  |  |  |
| A10                   | Discharge to sewer                                  | Discharge of process effluent resulting from the main factory operations to foul sewer.  | From the generation of process effluent, to its discharge to foul sewer via emission point E1 – in accordance with the trade effluent consent issued by United Utilities. |  |  |  |  |
| A11                   | Storage and handling of chemicals                   | Handling and storage of chemicals for cleaning and equipment maintenance.  | From the receipt of chemicals, to their use onsite.  Sodium hydroxide based cleaning chemicals are to comply with the specification provided in table S2.1.               |  |  |  |  |
| A12                   | Compressed air supply                               | Operation of Hydrovane screw air compressors to provide compressed air for the operation of machinery in the cake and pie factory. | From the generation of compressed air, to its supply for use by on-site operations.   |  |  |  |  |

| Table S1.2 Operating techniques                                 |   |               |  |  |  |
|---|---|---------------|--|--|--|
| Description   | Parts   | Date Received |  |  |  |
| Application<br>EPR/TP3903PE/A001                                | Parts C, D, E and F of the EPR Application Document & BAT 05/11/19 Assessment (reference: CL1001).  |               |  |  |  |
|   | Response to question 2 of the not duly made email (dated: 01/05/20) providing a site boundary plan.   | 18/05/20      |  |  |  |
| Responses to the first<br>Schedule 5 Notice,<br>dated: 27/07/20 | Responses to questions 5, 6, 7, 8 and 9 of the Notice, providing information on the following:  • secondary containment;  • effluent treatment plant;  • re-fuelling procedure;  • accident management plan; and  • drainage plans. | 21/09/20      |  |  |  |
| Responses to the second Schedule 5 Notice, dated: 23/10/20      | Responses to questions 2 and 4 of the Notice, providing information on:  • emissions to sewer; and  • the BAT assessment.   | 08/12/20      |  |  |  |

|           | able S1.3 Improvement programme requirements  |          |  |  |  |  |
|-----------|---|----------|--|--|--|--|
| Reference | Requirement   | Date     |  |  |  |  |
| IC1       | The Operator shall review the design, method of construction and integrity of the site's secondary containment surrounding all above and below ground bulk storage vessels on site. This review shall be carried out by a qualified civil or structural engineer. The review shall compare the constructed secondary containment against the standards set out in CIRIA C736 – Containment Systems for the Prevention of Pollution – secondary, tertiary and other measures for industrial and commercial premises or other relevant industry standard or such other subsequent guidance as may be agreed in writing from the Environment Agency. The review shall include: | 01/03/22 |  |  |  |  |
|           | The physical condition of the secondary containment;  |          |  |  |  |  |
|           | The suitability for providing containment when subjected to the dynamic and static loads caused by catastrophic tank failure;   |          |  |  |  |  |
|           | <ul> <li>Any work required to ensure compliance with the standards set out in<br/>CIRIA C736 or other relevant industry standard;</li> </ul>  |          |  |  |  |  |
|           | Timescales for any improvement necessary; and   |          |  |  |  |  |
|           | A preventative maintenance and inspection regime.   |          |  |  |  |  |
|           | The written report of the review shall be submitted to the Environment Agency for approval including timescales for the implementation of any remedial works proposed. The Operator shall implement the improvements to the approved timescales.  |          |  |  |  |  |
| IC2       | The Operator shall submit a report to the Environment Agency on establishing an appropriate environmental management system, having regard to each of the twenty features listed under BAT 1 of the Best Available Techniques conclusions for the Food, Drink and Milk Industries (dated: 04/12/19) and Environment Agency web guidance: "Develop a management system: environmental permits," ( <a href="https://www.gov.uk/guidance/develop-a-management-system-environmental-permits">https://www.gov.uk/guidance/develop-a-management-system-environmental-permits</a> ). The report shall include time-scales to implement such a system.                              | 01/10/21 |  |  |  |  |
|           | The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.   |          |  |  |  |  |
| IC3       | The Operator shall establish an inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams, that incorporates each of the six features listed under BAT 2 of the Best Available Technique Conclusions for the Food, Drink and Milk Industries (dated: 04/12/19).  | 01/03/22 |  |  |  |  |
|           | The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the inventory.  |          |  |  |  |  |
| IC4       | The Operator shall submit a written energy efficiency plan, as required under BAT 6a of the Best Available Technique Conclusions for the Food, Drink and Milk Industries (dated: 04/12/19), to the Environment Agency. This plan shall incorporate an appropriate combination of the common techniques listed under BAT 6b.   | 01/03/22 |  |  |  |  |
|           | The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.   |          |  |  |  |  |
| IC5       | The Operator shall submit a written plan on achieving BAT 7 "to reduce water consumption and the volume of waste water discharged", of the Best Available Techniques Conclusions for the Food, Drink and Milk Industries (dated: 04/12/19), to the Environment Agency. This plan must incorporate BAT 7a "water recycling and/or re-use" and one or a combination of the techniques listed under BAT 7b to 7k.  | 01/03/22 |  |  |  |  |

| Table S1.3 I | mprovement programme requirements   |  |
|--------------|---|--|
| Reference    | Requirement   | Date   |
|              | The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.   |  |
| IC6          | The Operator shall submit a written plan on achieving BAT 8 "to prevent or reduce the use of harmful substances," of the Best Available Techniques Conclusions for the Food, Drink and Milk Industries (dated: 04/12/19), to the Environment Agency. This plan must incorporate one or a combination of the four techniques listed under BAT 8.  The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.  | 01/03/22   |
| IC7          | The Operator shall submit a written report to the Environment Agency for approval, detailing the results of a survey of all existing drainage systems on site.  Where appropriate, the report shall contain dates for the implementation of any remedial measures required.   | 01/03/22   |
|              | Any improvement works identified by the report shall be implemented by the Operator from the date of approval by the Environment Agency subject to such amendments or additions as notified by the Environment Agency.  |  |
| IC8a         | The operator shall submit to the Environment Agency for approval:   | 01/09/22   |
|              | <ul> <li>An updated Stage 1 – 3 assessment within the 'Site Condition and Baseline Report' prepared by Enviro Solutions, dated: 25th January 2021 (Ref: CL1002) Version 3, to include relevant information from the reports produced to comply with IC1 and IC7, as well as assess the potential risks posed to soil and groundwater from hazardous and non-hazardous substances; and</li> <li>An updated 'Site Condition Report on H5 Template,' dated: 02/02/21, to include a summary of the findings of the Stage 1 – 3 assessment detailed within the updated 'Site Condition and Baseline Report' under 'Baseline soil and groundwater reference data' in section 2.0</li> </ul>   |  |
|              | within the 'Site Condition Report on H5 Template'.  Where the Stage 1 – 3 assessment concludes that baseline reference data is required, the Operator shall submit proposals to the Environment Agency for approval detailing the proposed locations of boreholes, proposed analytical suites and timescales to undertake intrusive works.  |  |
| IC8b         | <ul> <li>If, on completion of IC8a, it is determined that baseline reference data is required then the Operator shall submit the following to the Environment Agency for approval, within six months of the completion of IC8a:</li> <li>An updated 'Site Condition and Baseline Report' prepared by Enviro Solutions, dated: 25th January 2021 (Ref: CL1002) Version 3, to include details of the baseline established for soil and groundwater and a monitoring plan to comply with the requirements of condition 3.1.3 for periodic monitoring of relevant hazardous substances and any other monitoring that is proposed for non-hazardous substances;</li> <li>A monitoring plan shall be prepared with reference to the information detailed within the SCR and shall include details of proposed monitoring locations, analytical suites and the proposed frequency of monitoring. The monitoring plan shall include details of the information to be included within the monitoring reports produced for</li> </ul> | Within 6<br>months of the<br>completion of<br>IC8a |

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

| Table S2.1 Raw materials and fuels    |                           |  |  |
|---------------------------------------|---------------------------|--|--|
| Raw materials and fuel description    | Specification             |  |  |
| Sodium hydroxide (cleaning chemicals) | <0.03 ppm mercury content |  |  |

## **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<br>(including<br>unit) | Reference period | Monitoring frequency | Monitoring standard or method |  |
| A1, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | External boiler   | Oxides of<br>Nitrogen<br>(NO and<br>NO <sub>2</sub><br>expressed<br>as NO <sub>2</sub> ) | 132 mg/m <sup>3</sup>        | Periodic         | Every 3<br>years     | MCERTS<br>BS EN<br>14792      |  |
| A2, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Internal boiler 1   |  | 158 mg/m <sup>3</sup>        |                  |                      |                               |  |
| A3, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Internal boiler 2   |  | 151 mg/m <sup>3</sup>        |                  |                      |                               |  |
| A1, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | External boiler   | Carbon<br>monoxide   | No limit set                 |                  |                      |                               |  |
| A2, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Internal boiler 1   |  |                              |                  |                      |                               |  |
| A3, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Internal boiler 2   |  |                              |                  |                      |                               |  |
| A4, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | WQF cooks<br>extraction system<br>(steam extraction<br>from production<br>area) | No<br>parameters<br>set  | No limit set                 |                  |                      |                               |  |

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements                 |   |                         |                              |                  |                      |                               |
|--|---|-------------------------|------------------------------|------------------|----------------------|-------------------------------|
| Emission point ref. & location   | Source  | Parameter               | Limit<br>(including<br>unit) | Reference period | Monitoring frequency | Monitoring standard or method |
| A5, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Acrivarn oven extraction  | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A6, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Spiral 3 packaging<br>area extraction<br>(production area<br>ventilation) | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A7, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Mess floor extraction (plant room area ventilation)                       | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A8 to A14,<br>main factory –<br>as shown on<br>the Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Cooling towers 1 to 7   | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A15, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20     | Cooling tower 8   | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A16 to A20,<br>cold store – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20  | Cooling towers 9 to 13  | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A21, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20       | Ammonia plant 1<br>(heat extraction<br>spiral 3)                          | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A22, main<br>factory – as<br>shown on the<br>Emission  | Ammonia plant 2<br>(heat extraction<br>spiral 4)                          | No<br>parameters<br>set | No limit set                 |                  |                      |                               |

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements                  |  |                         |                              |                     |                      |                               |  |
|---|--|-------------------------|------------------------------|---------------------|----------------------|-------------------------------|--|
| Emission<br>point ref. &<br>location  | Source   | Parameter               | Limit<br>(including<br>unit) | Reference<br>period | Monitoring frequency | Monitoring standard or method |  |
| Points Site<br>Plan, dated:<br>08/12/20   |  |                         |                              |                     |                      |                               |  |
| A23 to A27,<br>main factory –<br>as shown on<br>the Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Oven line extraction 1 to 5  | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |
| A28, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Steamer extraction   | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |
| A29, main<br>factory – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Ammonia plant 3<br>(heat extraction<br>spiral 1 and 2 plant<br>room) | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |
| A30 to A32,<br>main factory –<br>as shown on<br>the Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Washroom extraction 1 to 3   | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |
| A33 to A38,<br>main factory –<br>as shown on<br>the Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Plant room<br>extraction 1 to 6                                      | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |
| A39, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20      | Cakes – fryer 1  | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |
| A40, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20      | Cakes – oven line 2 extraction                                       | No<br>parameters<br>set | No limit set                 |                     |                      |                               |  |

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements                    |  |                         |                              |                  |                      |                               |
|---|--|-------------------------|------------------------------|------------------|----------------------|-------------------------------|
| Emission<br>point ref. &<br>location  | Source                                 | Parameter               | Limit<br>(including<br>unit) | Reference period | Monitoring frequency | Monitoring standard or method |
| A41, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Cakes – ammonia plant                  | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A42, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Cakes – cooling<br>tunnel 1            | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A43, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Cakes – cooling<br>tunnel 2            | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A44, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Cakes – fryer 2                        | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A45 to A48,<br>cakes building<br>– as shown on<br>the Emission<br>Points Site<br>Plan, dated:<br>08/12/20 | Cakes – oven line 1, extraction 1 to 4 | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A49, cakes<br>building – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20        | Cakes – kettle extraction              | No<br>parameters<br>set | No limit set                 |                  |                      |                               |
| A50 to A52,<br>cold store – as<br>shown on the<br>Emission<br>Points Site<br>Plan, dated:<br>08/12/20     | Ammonia plant                          | No<br>parameters<br>set | No limit set                 |                  |                      |                               |

| Table S3.2 Point source emissions to sewer   |   |           |                       |                     |                      |                               |
|--|---|-----------|-----------------------|---------------------|----------------------|-------------------------------|
| Emission point ref. & location   | Source  | Parameter | Limit (incl.<br>Unit) | Reference<br>period | Monitoring frequency | Monitoring standard or method |
| E1 as shown on<br>the Emission<br>Points Site Plan,<br>dated: 08/12/20,<br>emission to<br>Crewe WwTW           | Main factory discharge                                |           |                       |                     |                      |                               |
| E2 as shown on<br>the Emission<br>Points Site Plan,<br>dated: 08/12/20,<br>emission to<br>Crewe WwTW           | Cakes building discharge via effluent treatment plant |           |                       |                     |                      |                               |
| E3 to E15 as<br>shown on the<br>Emission Points<br>Site Plan, dated:<br>08/12/20,<br>emission to<br>Crewe WwTW |   |           |                       |                     |                      |                               |

## 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. | A1, A2 and A3                          | Every 3 years    | 1 January     |

| Table S4.2: Annual production/treatment |        |  |
|---|--------|--|
| Parameter                               | Units  |  |
| Total product                           | tonnes |  |

| Table S4.3 Performance parameters |                         |        |  |
|-----------------------------------|-------------------------|--------|--|
| Parameter                         | Frequency of assessment | Units  |  |
| Water usage                       | Annually                | tonnes |  |
| Energy usage                      | Annually                | MWh    |  |
| 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         | 17/03/21     |  |
| Water usage                  | Form water usage 1 or other form as agreed in writing by the Environment Agency | 17/03/21     |  |
| Energy usage                 | Form energy 1 or other form as agreed in writing by the Environment Agency      | 17/03/21     |  |
| Other performance indicators | Form performance 1 or other form as agreed in writing by the Environment Agency | 17/03/21     |  |

## 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                                   |  |
|  |  |
|  | any malfunction, breakdown or failure of equipment or techniques,<br>nce not controlled by an emission limit which has caused, is<br>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 t                              | the breach of a limit  |

To be notified within 24 hours of detection unless otherwise specified below

Parameter(s)

Emission point reference/ source

Measured value and uncertainty

Date and time of monitoring

| (b) Notification requirements for t   | the breach of a li | mit                       |                     |
|---|--------------------|---------------------------|---------------------|
| To be notified within 24 hours of   | detection unless   | otherwise specified belo  | ow .                |
| Measures taken, or intended to be taken, to stop the emission               |                    |                           |                     |
|   |                    |                           |                     |
| Time periods for notification follo   | wing detection o   | of a breach of a limit    |                     |
| Parameter   |                    |                           | Notification period |
|   |                    |                           |                     |
|   |                    |                           |                     |
|   |                    |                           |                     |
|   |                    |                           |                     |
| (c) Notification requirements for t   |                    | mit conditions not relate | d to limits         |
| To be notified within 24 hours of det                                       | tection            |                           |                     |
| 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                                       | the detection of a | any significant adverse e | nvironmental 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 submit   |                    | n as practicable          | <b>)</b>            |
| notification under Part A.  |                    |                           |                     |
| Measures taken, or intended to be t a recurrence of the incident            | aken, to prevent   |                           |                     |

| 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   |  |

<sup>\*</sup> 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.

"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.

"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.

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.

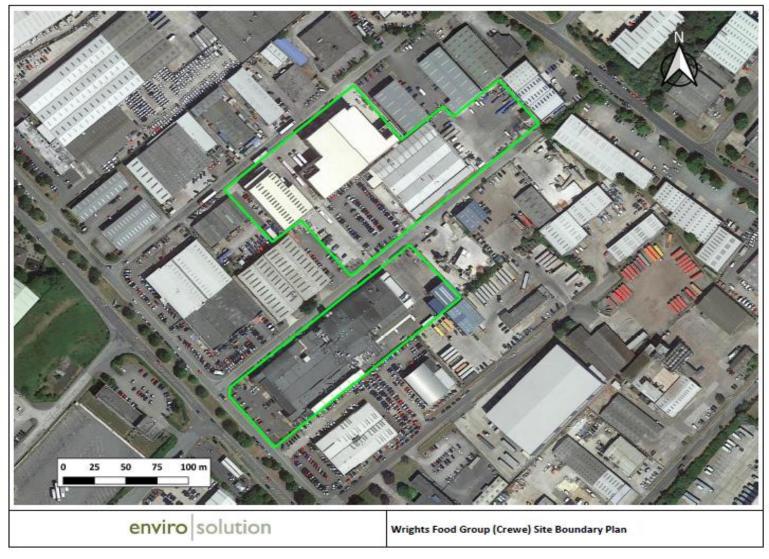
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

• 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 other than gas engines and gas turbines, 6% dry for solid fuels.

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