



Environment  
Agency

# Permit with introductory note

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

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Duffields (South West) Limited

Pen Mill Animal Feed Mill

Babylon View

Pen Mill Trading Estate

Yeovil

Somerset

BA21 5HR

## **Permit number**

EPR/NP3107SM

# Pen Mill Animal Feed Mill

## Permit number EPR/NP3107SM

### Introductory note

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

The main features of the permit are as follows.

Pen Mill Animal Feed Mill is an existing animal feed manufacturing facility operated by Duffields (South West) Limited. The installation is located approximately 2 kilometres north-east of Yeovil, on the eastern edge of the Pen Mill Trading Estate, in Yeovil, Somerset, approximately centred on National Grid Reference ST 57683 17115. The mill manufactures compound and blended animal feeds, which are suitable for consumption without further processing, and has been producing animal feed since 1992. The expansion of operations on the site during 2019 and 2020 increased the production capacity to 400 tonnes per day and the site requires a Part A environmental permit.

*Section 6.8 Part A (1) (d) (ii): Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging) - only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day.*

The key stages in the process are receipt and storage of raw materials, raw material handling, weighing, grinding, mixing, steam conditioning, pressing, cooling, fats coating and final product storage and despatch.

The Site operates on a 24/7 basis, with shutdown of operations taking place between 12:00 on Saturday until 22:00 on Sunday. Not all processes are operated throughout night; the movement of heavy goods vehicles for the receipt (intake) of raw materials and the loading of materials are limited to take place between approximately 06:00 to 20:00.

The main emissions to air arise from one product cooler and one 0.885MW gas oil fueled boiler.

The main emissions to water arise from the discharge of uncontaminated surface water to a tributary of the River Yeo, together with the discharge of vehicle washings and boiler blowdown to foul sewer, for further treatment at Pen Mill Sewage Treatment Works, operated by Wessex Water.

Air compressor condensate is collected and stored within an IBC, prior to off-site disposal at a licensed treatment facility.

The following directly associated activities occur on site:

#### Raw material handling and storage

The receipt and storage of raw materials is undertaken in dedicated areas of the installation. Different handling techniques are used dependent upon the nature of the materials and the volumes in which they are received to site. Deliveries of raw materials to the site are generally limited to daylight hours and are supervised fully by site operatives. Unloading procedures are followed, so that accidental releases of raw materials and fugitive emissions are avoided. All solid bulk raw materials are tipped into the intake pit and transported mechanically around the main building via the enclosed conveyance systems directly to storage. The intake pit is provided with an enclosed shelter with a shutter door and extraction unit, to contain dust. Liquid raw materials are pumped directly into storage tanks from road transport. All packaged materials (both solid and liquid) are stored on bunded pallets, either internally or externally, in their original primary packaging, prior to use.

#### Finished product storage and dispatch

Finished products, both compound and blended feeds, are conveyed to one of the dedicated finished product bays located within the bulking warehouse prior to being bagged and dispatched to third party customers. Product despatch is conducted within one covered drive-through loading bay attached to the

main feed mill building. Products are conveyed from the finished product holding bins to the appropriate discharge pipe and into the vehicle for delivery to the customer. Prior to vehicle dispatch from the installation all vehicles are covered with a ground operated roll over sheet. Despatch loading is conducted within the main processing building to minimise the potential for fugitive emissions of dust and odour.

### Utilities

In support of the production processes there are a number of site utilities:

1. Steam raising: The steam generation plant has a single steam raising boiler which is fuelled by gas oil, with a rated thermal input of 0.885MW. Steam is primarily used in the conditioning process but may also be used to heat viscous liquid materials (vegetable oils) so that they can be readily pumped to their points of use and used in the manufacturing process.
2. Boiler feed water treatment: Potable water is used for the boiler feed water. The water is softened before use, pH adjusted and dosed with a scale inhibitor and an oxygen scavenging chemical to prevent corrosion.
3. Air compressors: The site operates a number of screw compressors for the generation of compressed air, which serves the production lines and is also used for material conveyance around the installation.

### Cleaning and sanitation

The site operates a cleaning and sanitation programme, as part of the Site's Quality Management System. In order to minimise pollution during cleaning, production is planned to sequence similar product batches together, therefore minimising changeovers and the need for cleaning. The site uses cleaning chemicals for general cleaning to maintain an acceptable standard of housekeeping, to complement pest control programmes and to support the corrective actions implemented for minor environmental incidents (such as spillages).

Activities are managed in accordance with an environmental management system.

The surrounding land generally consists of open fields, the River Yeo and the railway line between Yeovil and Castle Cary to the east and light industrial uses associated with the business park to the north, west and south. The nearest residential properties are located approximately 190 metres to the west. Further residential properties include those associated with a housing estate approximately 340 metres to the north.

There is one Site of Special Scientific Interest (SSSI), six Local Wildlife Sites (LWS) and one Ancient Woodland (AW) within 2 kilometres of the installation. An assessment of the impact of emissions has been carried out and the installation is considered to have no adverse effect on the nature conservation sites.

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

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/NP3107SM/A001	Duly made 29/07/21	Application for an environmental permit.
Additional information received	25/08/21	Confirmation of rated thermal input of replacement boiler.
Additional information received	13/09/21	Response to request for further information providing information in support of the air quality modelling.
Additional information received	30/09/21, 11/11/21 and 23/11/21	Response to Parts A to C of the Schedule 5 Notice in relation to fugitive emissions, site drainage and storage and containment.
Additional information received	24/11/21	Response to request for further information clarifying site drainage, providing a revised site plan and providing confirmation with regards to the removal of contaminated rainwater collected within the concrete bund serving the diesel /Ad-blue tank.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Permit determined EPR/NP3107SM Billing ref: NP3107SM	01/12/21	Permit issued to Duffields (South West) Limited.

End of introductory note

# Permit

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

### Permit number

**EPR/NP3107SM**

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

**Duffields (South West) Limited** ("the operator"),

whose registered office is

**Babylon View  
Pen Mill Trading Estate  
Yeovil  
Somerset  
BA21 5HR**

company registration number 02691453

to operate an installation at

**Pen Mill Animal Feed Mill  
Babylon View  
Pen Mill Trading Estate  
Yeovil  
Somerset  
BA21 5HR**

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

Name	Date
Maxine Evans	01/12/2021

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.

### **2.4 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, S3.2 and S3.3.

3.1.2 The limits given in schedule 3 shall not be exceeded.

- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

## **3.2 Emissions of substances not controlled by emission limits**

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

## **3.3 Odour**

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

## **3.4 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, S3.2 and 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, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.



## **3.6 Pests**

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
  - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

## **4 Information**

### **4.1 Records**

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
  - (b) be made as soon as reasonably practicable;
  - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
  - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
    - (i) off-site environmental effects; and
    - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

### **4.2 Reporting**

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
  - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
  - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;

- (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
- (c) giving the information from such results and assessments as may be required by the forms specified in those tables.

4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

## 4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
  - (i) inform the Environment Agency,
  - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
  - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
  - (i) inform the Environment Agency, and
  - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

4.3.2 Any information provided under condition 4.3.1 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 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.

- 4.3.4 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.
- 4.3.5 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.6 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## **4.4 Interpretation**

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

# Schedule 1 – Operations

<b>Table S1.1 activities</b>		
<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
Section 6.8 Part A (1) (d) (ii)	Treatment and processing, of only vegetable raw materials, intended for the production of food or feed, at a plant with a finished product production capacity greater than 300 tonnes per day.	From receipt of raw materials to storage and dispatch of finished product. Production capacity is limited to 400 tonnes per day.
<b>Directly Associated Activity</b>		
Steam raising	0.885MWth gas oil fuelled boiler.	From receipt of fuel to production of steam for use in the process to emission of combustion gases.
Air compression	Operation of screw compressors	From generation of compressed air to disposal of condensate offsite
Cleaning and sanitation	Cleaning and sanitation	The cleaning and sanitation of plant, equipment and process areas.
Vehicle washing	Provision of Vehicle washing facilities	From operation of vehicle wash facilities to discharge of wash waters to sewer
Storage and use of chemicals	Storage and use of chemicals for onsite use.	From receipt of chemicals to disposal of waste arising
Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application EPR/NP3107SM/A001	<ul style="list-style-type: none"> <li>• ‘Best Available Techniques Assessment’ document, dated July 2021, provided in response to Section 2 – Emissions, Section 3 – Operating techniques, Section 4 – Monitoring and Section 6 – Resource efficiency, of Part B3 of the application form.</li> <li>• Confirmation of the sites’ current specific energy consumption and compliance with the Indicative environmental performance levels for specific energy consumption, as stated in Table 17.2, section 17.2.1.1 of the Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries, published 04/12/19.</li> <li>• Noise Management Plan, dated April 2021, provided in response to Section 3 – Operating techniques of Part B3 of the application form.</li> </ul>	Duly Made 29/07/2021

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
	<ul style="list-style-type: none"> <li>• Odour Management Plan, dated July 2021, provided in response to Section 3 – Operating techniques of Part B3 of the application form.</li> <li>• Environmental Risk Assessment, dated April 2021, provided in response to Section 6 – Environmental Risk Assessment, of Part B2 of the application form.</li> <li>• Air quality dispersion modelling, dated July 2021, provided in response to Section 6 - Environmental Risk Assessment, of Part B2 of the application form.</li> </ul>	
Additional information	Response to request for information providing rated thermal input of replacement boiler.	25/08/21
Additional information	Response to request for information providing a copy of the 'Socotec stack emissions monitoring report' and clarifying how particulate emission rates were derived for the cooler.	13/09/21
Response to Schedule 5 Notice dated 31/08/21	Response to Parts A to C providing: <ul style="list-style-type: none"> <li>• Confirmation that outlets, redundant vents and fans in the mill and grinder buildings have been sealed.</li> <li>• Details regarding the discharge of boiler blowdown, compressor condensate and lorry wash effluent.</li> <li>• Details regarding the trade effluent consent and maintenance of the foul sewer.</li> <li>• Details of the cleaning procedures for the bulk unloading area.</li> <li>• Proposals and timescales for installation of collision protection measures.</li> <li>• Proposals and timescales for resurfacing work.</li> <li>• Proposals and timescales for the installation of a secondary containment bund around the filling points for the bulk fuel oil tank, molasses tank and vegetable oil tank and the IBC acting as drip containment for these tanks.</li> </ul>	30/09/21, 11/11/21 and 23/11/21
Response to request for information dated 23/11/21	Response clarifying site drainage, providing a revised site plan, and providing confirmation with regards to the removal of contaminated rainwater collected within the concrete bund serving the diesel /Ad-blue tank.	24/11/21

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC1	<p>The Operator shall submit a written report to the Environment Agency for approval providing evidence that a secondary containment bund has been constructed around the filling points for the bulk fuel oil tank, molasses tank and vegetable oil tank and the IBC used for drip containment for these tanks, as stated in the Schedule 5 response, reference 416.11422.00001, and dated 30/09/21, in accordance with 'Control and monitor emissions for your environmental permit' and the 'Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries', dated 2019.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.</p>	31/12/21 or other date as agreed with the Environment Agency
IC2	The Operator shall submit a written report to the Environment Agency for approval providing evidence that vehicle collision protection measures	01/01/22 or other date as

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
	<p>have been installed, as stated in the Schedule 5 response, reference 416.11422.00001, and dated 30/09/21, in accordance with 'Control and monitor emissions for your environmental permit' and the 'Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries', dated 2019.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.</p>	agreed with the Environment Agency
IC3	<p>The operator shall carry out an assessment of the measures that are in place to reduce the risk of a pollution incident caused by firewater. The review shall include:</p> <ul style="list-style-type: none"> <li>• consideration of the principals set out in 'Control and monitor emissions for your environmental permit' and the 'Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries', dated 2019.</li> <li>• Identification of any improvements necessary to minimise the risk of a pollution incident caused by firewater.</li> </ul> <p>A written report summarising the assessment, and any necessary improvements, shall be submitted to the Environment Agency for approval. The Environment Agency approval shall include timescales for the Operator to implement the improvements.</p>	30/01/22
IC4	<p>The Operator shall submit a written report to the Environment Agency for approval providing evidence that impermeable surfacing has been installed in the area to the rear of the mill, as stated in the Schedule 5 response, reference 416.11422.00001 and dated 30/09/21, in accordance with 'Control and monitor emissions for your environmental permit' and the 'Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries', dated 2019.</p> <p>The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.</p>	01/07/23 or other date as agreed with the Environment Agency

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

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

## Schedule 3 – Emissions and monitoring

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A1 [Point A1 on site plan in Schedule 7]	Cooler vent via a cyclone dust control system	Particulate matter	20 mg/m <sup>3</sup>	Periodic	Annually	BS EN 13284-1
A2 [Point A2 on site plan in Schedule 7]	0.885MWth gas oil fuelled boiler	No parameters set	No limit set	---	---	---

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
SW1 [Point SW1 on site plan in schedule 7] emission to an unnamed tributary of the River Yeo, via soakaway	Uncontaminated site surface water from roofs and non-operational areas	Visible oil and grease	No visible oil and grease	Instantaneous	Weekly [1]	Visual inspection

Notes

[1] Records to be retained for inspection upon request by the Environment Agency.

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. Unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
S1 [Point S1 on site plan in schedule 7] discharge to Wessex Water Pen Mill Sewage Treatment Works	Vehicle washings, via a full retention separator, and boiler blowdown	Visible oil and grease	No visible oil and grease	Instantaneous	Weekly [1]	Visual inspection

Notes

[1] Records to be retained for inspection upon request by the Environment Agency.



## Schedule 4 – Reporting

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

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Point source emissions to air Parameters as required by condition 3.5.1	A1	Every 12 months	1 January

<b>Table S4.2: Annual production</b>	
<b>Parameter</b>	<b>Units</b>
Animal feed	tonnes

<b>Table S4.3 Performance parameters</b>		
<b>Parameter</b>	<b>Frequency of assessment</b>	<b>Units</b>
Water usage	Annually	m <sup>3</sup>
Specific water consumption (yearly average) per tonne of animal feed	Annually	m <sup>3</sup> /tonnes of products
Energy usage	Annually	MWh
Specific energy consumption (yearly average) per tonne animal feed	Annually	MWh/tonne of products
Waste disposal and/or recovery	Annually	tonnes

<b>Table S4.4 Reporting forms</b>		
<b>Parameter</b>	<b>Reporting form</b>	<b>Form version number and date</b>
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

# 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	

<b>(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution</b>	
<b>To be notified within 24 hours of detection</b>	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

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

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

<b>Time periods for notification following detection of a breach of a limit</b>	
<b>Parameter</b>	<b>Notification period</b>

<b>(c) Notification requirements for the breach of permit conditions not related to limits</b>	
<b>To be notified within 24 hours of detection</b>	
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.	

<b>(d) Notification requirements for the detection of any significant adverse environmental effect</b>	
<b>To be notified within 24 hours of detection</b>	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

## **Part B – to be submitted as soon as practicable**

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“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.

“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.

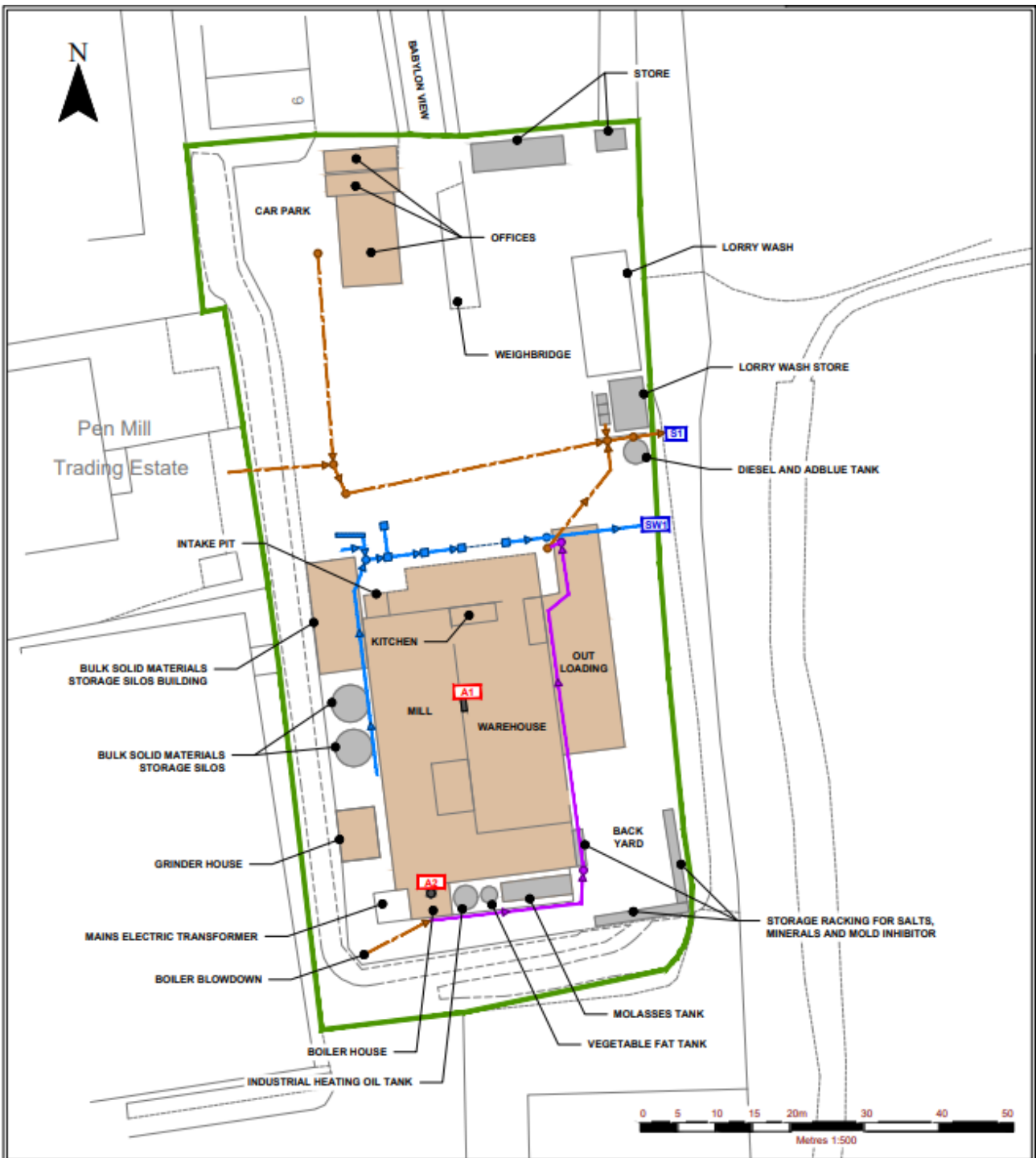
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

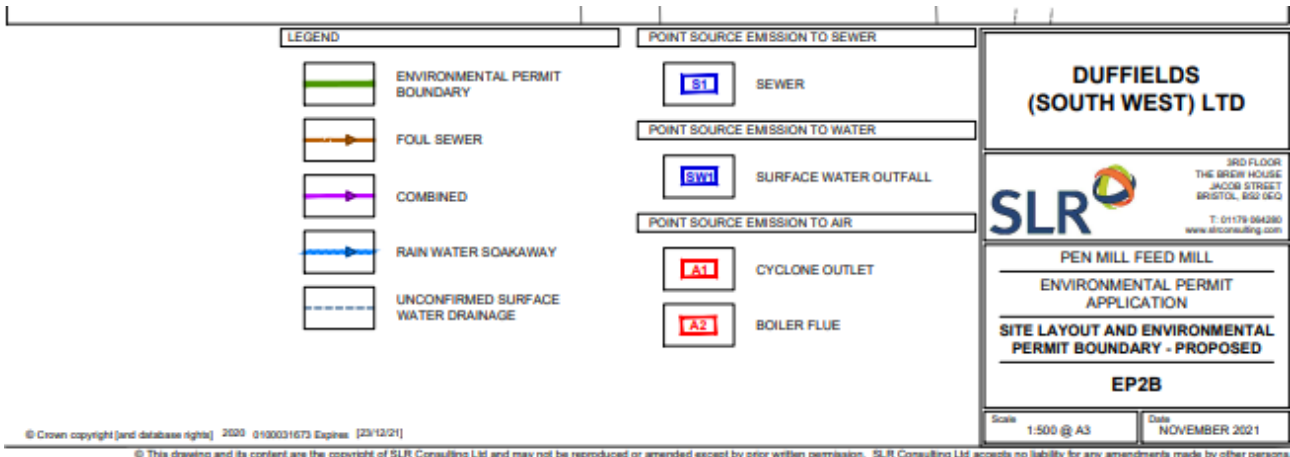
- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or

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

# Reporting Forms

## Emissions to Air Reporting Form

**Permit number:** EPR/NP3107SM

**Operator:** Duffields (South West) Limited

**Facility name:** Pen Mill Animal Feed Mill

**Emissions to Air Reporting Form:** version 1, 08/03/2021

Reporting of emissions to air for the period from [DD/MM/YY] to [DD/MM/YY]

Emission point	Substance / parameter	Emission Limit Value	Reference period	Test method <sup>1</sup>	Result <sup>2</sup>	Sample dates and times <sup>3</sup>	Uncertainty <sup>4</sup>
A1	Particulate matter	20 mg/Nm <sup>3</sup>	Periodic				

**Signed:** [Name]

**Date:** [DD/MM/YY]

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report your monitoring results.



Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Complete columns 1 to 5 using the information from schedule 3 of your permit. Complete columns 6 to 8 with your monitoring data. Add additional rows as necessary.

- <sup>1</sup> Where an internationally recognised standard test method is used, give the reference number. Where another method that has been formally agreed with the Environment Agency, give the appropriate identifier. In other cases state the principal technique, for example gas chromatography.
- <sup>2</sup> Give the result as the maximum value (or the minimum value in the case of a limit that is expressed as a minimum) obtained during the reporting period, expressed in the same terms as the emission limit value. Where the emission limit value is expressed as a range, give the result as the 'minimum to maximum' of the measured values.
- <sup>3</sup> For non-continuous measurements give the date and time of the sample that produced the result. For continuous measurements give the percentage of the process operating time covered by the result.
- <sup>4</sup> Complete if the uncertainty associated with the result is not a 95% confidence interval. Leave blank for 95% confidence intervals.

## Water Usage Reporting Form

**Permit number:** EPR/NM3107SM

**Operator:** Duffields (South West) Limited

**Facility name:** Pen Mill Animal Feed Mill

**Water Usage Reporting Form:** version 1, 08/03/2021

Reporting of water usage for the year [YYYY]

<b>Water source</b>	<b>Water usage (m<sup>3</sup>)</b>	<b>Specific water usage (m<sup>3</sup>/unit) <sup>2</sup></b>
Mains water	<i>[insert annual usage in m<sup>3</sup> where mains water is used]</i>	<i>[insert annual usage in m<sup>3</sup>/unit where mains water is used]</i>
Other – <i>[specify other water source where applicable. Add extra rows where needed]</i>	<i>[insert annual usage in m<sup>3</sup> where applicable]</i>	<i>[insert annual usage in m<sup>3</sup>/unit where applicable]</i>
Total water usage	<i>[insert total annual water usage in m<sup>3</sup>]</i>	<i>[insert total annual water usage in m<sup>3</sup>/unit]</i>

**Operator's comments**

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**Signed:** *[Name]*

**Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report your annual water usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

## Energy Usage Reporting Form

**Permit number:** EPR/NP3107SM

**Operator:** Duffields (South West) Limited

**Facility name:** Pen Mill Animal Feed Mill

**Energy Usage Reporting Form:** version 1, 08/03/2021

Reporting of energy usage for the year [YYYY]

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/unit) <sup>2</sup>
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	<i>[insert annual consumption in MWh where electricity is imported]</i>	<i>[insert annual consumption in MWh/unit where electricity is imported]</i>
Natural gas	<i>[insert annual consumption in MWh where natural gas is used]</i>	<i>[insert annual consumption in MWh/unit where natural gas is used]</i>
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	<i>[insert annual consumption in MWh where gas oil is used]</i>	<i>[insert annual consumption in MWh/unit where gas oil is used]</i>
Other – <i>[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]</i>	<i>[insert annual consumption in MWh where applicable]</i>	<i>[insert annual consumption in MWh/unit where applicable]</i>

<b>Operator's comments</b>

**Signed:** *[Name]*

**Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report your annual energy usage.

Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. Add additional rows as necessary.

<sup>1</sup> Multiply delivered electricity by 2.4 to convert to primary energy where the electricity is supplied from the national grid. If the electricity is supplied from another source, specify the conversion factor used. Add additional rows as needed if electricity is imported from multiple sources.

<sup>2</sup> Divide energy consumption by an appropriate unit of raw material processed or product output.

# Other Performance Parameters Reporting Form

**Permit number:** EPR/NM3107SM

**Operator:** Duffields (South West) Limited

**Facility name:** Pen Mill Animal Feed Mill

**Other Performance Parameters Reporting Form:** version 1, 08/03/2021

Reporting of other performance parameters for the period from *[DD/MM/YY]* to *[DD/MM/YY]*

Parameter	Units
Animal feed production	tonnes
Waste sent for reuse/recovery (specify route)	tonnes
Waste sent for disposal (specify route)	tonnes

**Operator's comments**

**Signed:** *[Name]*

**Date:** *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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**Guidance for use:** Use this form to report the performance parameters (other than water and energy) required by your permit. Example text is shown in bracketed grey italics. Replace the example text by entering your own site specific information. The parameters to report and units to be used can be found in the 'Performance parameters' table in schedule 4 of your permit. Add additional rows as necessary.