

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

NWF Agriculture Limited

Sandysike Mill
Sandysike Industrial Estate
Sandysike
Longtown
Carlisle
Cumbria
CA6 5SS

Variation application number

EPR/DP3036JK/V002

Permit number

EPR/DP3036JK

Sandysike Mill

Permit number EPR/DP3036JK

Introductory note

This introductory note does not form a part of the notice

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

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

This consolidated permit has been issued following a full review against the best available techniques (BAT) conclusions for the Food, Drink and Milk Industries published on 4th December 2019 in the official journal of the European Union.

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2030.

The schedules specify the changes made to the permit.

Sandysike Mill manufactures compound and blended animal feeds which are suitable for consumption without further processing. The products manufactured in the mill are based upon core formulations of cereals (such as wheat and barley), vegetable oils and molasses, plus specific additives such as mineral supplements.

The key stages of the processing are raw material intake, weighing, grinding, mixing, conditioning, pressing, cooling and coating. The required feed materials, additives and minerals are weighed prior to grinding to a uniform grist size. The ground material is then transferred to the mixing stage of the process. At this point some material ('meal') is extracted directly from the mixer as product. Following this, the mix is conditioned through addition of steam and molasses. After conditioning, the hot mix is extruded through dies to produce pellets. The hot products are passed through a cooler causing them to harden and become durable. The majority of the pellets are subsequently coated in fat to complete the finished product. Some pellets are crumbed prior to coating with fats. Pelleted product is used as feed for larger animals, such as cattle and pigs whilst crumbed product and meal is used as chicken feed. Finished product is stored prior to being automatically loaded to bulk vehicles for delivery to customers.

The Environmental Permit is for the main listed activity falling under Section 6.8 Part A(1)(d)(ii) of the Environmental Permitting Regulations: *Treatment and processing of only vegetable raw materials, for the intended production of animal feed, at a plant with a finished product capacity greater than 300 tonnes per day.*

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 kerosene, with a thermal input of 1.6MW. 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 within 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 installation operates a cleaning and sanitation programme, as part of the site's Quality Management System (QMS). 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 installation uses cleaning chemicals for general cleaning around the site 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).

The main emissions to air arise from a single raw material grinder (A1) and two pellet coolers (A2-A3). The site also has a 1.6 MWth kerosene boiler to produce steam used in the process. Additional emission points also serve the installation; mainly to enable safe operations, such as tank breathing and dust relief vents. There are no emissions to sewer. There are two discharges to surface water; SW1 consisting of surface water run-off from site surfaces and roofs and vehicle wash down water via an oil-water separator, and SW2 consisting of surface run-off from roofs. Vehicles are washed on site using water only. Boiler blowdown water and air compressor condensate are channelled to a collection tank and exported off-site for disposal at a licensed treatment facility.

The installation is located approximately 10 kilometres north of Carlisle, within Sandysike Industrial Estate, Longtown, Cumbria. The installation is approximately centred on National Grid Reference NY 38670 66148. The feed mill is located within a predominantly rural area. The nearest sensitive receptor is a residential property 420 metres to the west of the installation boundary. Other sensitive receptors include a caravan park located approximately 480 metres to the north east of the installation boundary and a residential property located approximately 585 metres to the east of the installation boundary.

There are three Special Areas of Conservation (SAC), a Special Protection Areas (SPA) and one Ramsar site within 10 kilometres of the installation. There are no Sites of Special Scientific Interest (SSSI) within 2km of the installation. There is one Local Wildlife Site (LWS) and two Ancient Woodlands (AW) within 2 kilometres of the installation.

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

Status log of the permit		
Description	Date	Comments
Application EPR/DP3036JK/A001	Duly made 29/11/2018	Application for an animal feed mill.
Additional information received	12/12/2018	Stack input parameters for boiler and coolers.
Additional information received	04/01/2019	Revised noise impact assessment and supporting information.
Additional information received	07/01/2019	Revised noise modelling files.
Additional information received	15/01/2019	Supporting information for noise impact assessment.
Additional information received	12/03/2019	Schedule 5 response providing details of routine inspection, maintenance and contingency procedures for abatement equipment, details regarding boiler blow down water, detail regarding container vessels and associated containment facilities, revised noise management plan, revised odour management plan, revised site layout plan, reference 'Site Layout Plan 002' and procedures for minimisation of fugitive emissions.
Additional information received	16/05/2019	Schedule 5 response and response to request for further information providing a revised odour

Status log of the permit		
Description	Date	Comments
		management plan, revised noise management plan, mill and blend shed cleaning and maintenance procedures, raw material handling procedures, inspection and maintenance procedures for the extraction unit in the raw material intake pit, clarification regarding vehicle wash down water and boiler blow down water, revised procedures for the containment of emergency firewater and further details regarding container vessels and associated containment facilities.
Additional information received	04/06/2019	Response to request for further information providing Glass and Liquid Spill Statement.
Additional information received	16/07/2019	Response providing clarification regarding disposal of air compressor condensate and boiler blow down water.
Additional information received	31/07/2019	Schedule 5 response providing revised noise impact assessment, noise management plan and modelling files.
	05/08/2019	Schedule 5 response providing on-site noise data and additional information in support of the noise impact assessment.
Additional information received	10/10/2019	Schedule 5 response providing revised noise impact assessment.
Additional information received	07/11/2019	Response confirming that the temporary storage tank for the storage of compressor condensate and boiler blow down water has been installed.
Permit determined EPR/DP3036JK	18/12/2019	Permit issued to NWF Agriculture Limited.
Application EPR/DP3036JK/V002 (variation and consolidation)	Duly made 29/07/2021	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Request for further information dated 01/04/2022	Response received 09/05/2022	Further information regarding <ul style="list-style-type: none"> • BATc 11 • Baseline Response Tool
Variation determined and consolidation issued EPR/DP3036JK (Billing ref. RP3508MC).	08//06/2022	Varied and consolidated permit issued in modern format

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

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

Permit number

EPR/DP3036JK

Issued to

NWF Agriculture Limited (“the operator”)

whose registered office is

Wardle

Nantwich

Cheshire

CW5 6BP

company registration number 01117234

to operate a regulated facility at

Sandysike Mill

Sandysike Industrial Estate

Sandysike

Longtown

Carlisle

Cumbria

CA6 5SS

to the extent set out in the schedules.

The notice shall take effect from 08/06/2022.

Name	Date
C G Morris	08/06/2022

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of an Environment Agency initiated variation.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/DP3036JK

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/DP3036JK/V002 authorising,

NWF Agriculture Limited (“the operator”),

whose registered office is

**Wardle
Nantwich
Cheshire
CW5 6BP**

company registration number 01117234

to operate an installation at

**Sandysike Mill
Sandysike Industrial Estate
Sandysike
Longtown
Carlisle
Cumbria
CA6 5SS**

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

Name	Date
C G Morris	08/06/2022

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.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2) the first monitoring measurements shall be carried out within four months of 01/01/2030 or of the date when the MCP is first put into operation, whichever is later.

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.

3.5 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.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:

- (a) a decision by the Secretary of State not to re-certify the agreement;
- (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
- (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	S6.8 A1 (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 through to dispatch of final product. Production capacity is limited to 380 tonnes per day.
Directly Associated Activity			
AR2	Steam supply	Medium Combustion plants: 1 x 1.6 MWth kerosene boiler	From receipt of fuel to release of products of combustion to air.
AR3	Storage and use of chemicals and oils	Storage and use of chemicals and oils at the installation.	From receipt of chemicals and oils to disposal of wastes arising.
AR4	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR5	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system.
AR6	Vehicle Washing	Generation of wash wasters from the onsite vehicle wash facilities	Handling and storage of wash wasters from onsite vehicle washing to the surface water system. Use of water only, no detergents are to be used.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/DP3036JK/A001	<ul style="list-style-type: none"> 'Best Available Techniques and Operating Techniques' document provided in response to Section 3 – Operating techniques, Section 4 – Monitoring and Section 6 – Resources efficiency, of Part B3 of the application form. 'Environmental Risk Assessment' document provided in response to Section 6 – Environmental Risk Assessment, of Part B2 of the application form. 	Duly Made 29/11/2018
Additional information received	Stack input parameters for boiler and coolers.	12/12/2018
Response to Schedule 5 Notice dated 28/01/2019	Response to questions 2, 5 and 6 providing details of routine inspection, maintenance and contingency procedures for abatement equipment, revised site layout plan, reference 'Site	12/03/2019

Table S1.2 Operating techniques		
Description	Parts	Date Received
	Layout Plan 002', details regarding boiler blow down water and procedures for minimisation of fugitive emissions.	
Response to Request for further information dated 10/04/2019	Response providing details of container vessels and associated containment facilities.	16/05/2019
Response to Schedule 5 Notice dated 28/03/2019	Response to questions 1, 3, 5 and 9 providing raw materials handling procedures, mill and blend shed cleaning and maintenance procedures, inspection and maintenance procedures for the extraction unit in the raw material intake pit, clarification regarding boiler blow down water and vehicle wash down water and procedures for the containment of emergency firewater.	16/05/2019
Response to request for information dated 04/06/2019	Response to request for further information providing Glass and Liquid Spill Statement.	04/06/2019
Response to request for information dated 09/07/2019	Response providing details regarding temporary storage and disposal of air compressor condensate and boiler blow down water.	16/07/2019
Response to Schedule 5 Notice dated 28/03/2019	Response to question 7 providing revised noise management plan and noise modelling files.	31/07/2019
Response to Schedule 5 Notice dated 28/03/2019	Response to question 7 providing revised noise impact assessment.	10/10/2019
Response to request for information dated 05/11/2019	Response confirming that the temporary storage tank for the storage of compressor condensate and boiler blow down water has been installed.	07/11/2019
Regulation 61 Notice responses and supporting information	All parts	Received 29/07/2021
Regulation 61(1) Notice – request for further information dated 01/04/2022	Further information regarding BATc 11 & Baseline Reporting Tool	Received 09/05/2022

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC3	<p>The operator shall submit, for approval by Environment Agency, a report setting out progress to achieving the 'Narrative' BAT where BAT is currently not achieved, but will be achieved before 4 December 2023. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Methodology for achieving BAT 2) Associated targets /timelines for reaching compliance by 4 December 2023 3) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 1, 5 and 6.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	08/06/2023
IC4	<p>The operator shall submit, for approval by the Environment Agency, a report setting out progress to achieving the Best Available Techniques Conclusion Associated Emission Levels (BAT-AELs) where BAT is currently not achieved, but will be achieved before 4 December 2023. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Current performance against the BAT-AELs. 2) Methodology for reaching the BAT-AELs. 3) Associated targets /timelines for reaching compliance by 4 December 2023. 4) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Food, Drink and Milk industries with respect to the following:</p> <ul style="list-style-type: none"> • BAT 17 Table 4 (compliance with BAT-AELs for channelled dust emissions to air from grinding and pellet cooling in compound feed manufacture) <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	08/06/2023
IC5	<p>The operator shall submit, for approval by the Environment Agency, a report demonstrating compliance against BAT 17 Table 4 for channelled dust emissions to air from grinding for emission point A1.</p>	08/06/2023
IC6	<p>The Operator shall submit a report, for approval in writing by the Environment Agency, demonstrating the ability to comply with BAT 5 for monitoring of particulates from the grinder emission point A1 in accordance with the MCERTS standard.</p> <p>The report shall include, but not be limited to, the installation of the sampling ports and platforms to enable particulate monitoring in accordance with table S3.1.</p>	08/06/2023
IC7	<p>The Operator shall submit a written report to the Environment Agency of monitoring carried out to determine the size distribution of particulate matter in the exhaust gas emissions to air from emission points A1, A2 and A3, identifying the fractions within the PM₁₀ and PM_{2.5} ranges. The monitoring shall be carried out under representative operating conditions and shall be in accordance with EN ISO 23210 unless otherwise agreed with the Environment Agency.</p>	08/06/2023 or other date as agreed in writing 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
--	--

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on site plan in Schedule 7]	Grinder vent via reverse jet bag filter	Particulate matter	10 mg/m ³ [Note 1]	Average over sampling period	Annually	BS EN 13284-1
A2 [Point A2 on site plan in schedule 7]	Line 1 Cooler vent via cyclone dust separation unit	Particulate matter	20 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A3 [Point A3 on site plan in schedule 7]	Line 2 Cooler vent via cyclone dust separation unit	Particulate matter	20 mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A4 [Point A4 on site plan in schedule 7]	1.6 MWth kerosene fired boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	200 mg/m ³ [Note 2]	Periodic	Every three years [Note 3]	EN 14792
		Carbon Monoxide	No limit set	Periodic	Every three years [Note 3]	EN 15058
A5 & A6 [Points A5 & A6 on site plan in schedule 7]	Molasses Tank	No parameters set	No limits set	--	--	--
A7 & A8 [Points A7 & A8 on site plan in schedule 7]	Liquid fats storage tanks	No parameters set	No limits set	--	--	--
A9 [Point A9 on site plan in schedule 7]	Kerosene storage tank	No parameters set	No limits set	--	--	--
A10 [Point A10 on site plan in schedule 7]	Gas oil storage tank	No parameters set	No limits set	--	--	--
A11 [Point A11 on site plan in schedule 7]	AD Blue storage tank	No parameters set	No limits set	--	--	--
A12 [Point A12 on site plan in schedule 7]	Diesel storage tank	No parameters set	No limits set	--	--	--

Table S3.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A13 – A28 [Points A13 – A28 on site plan in schedule 7]	Bulk solid materials storage silos	No parameters set	No limits set	--	--	--

Note 1: The limit of 10 mg/m³ shall only apply upon completion of IC4 and IC5, and at the latest by 04/12/2023. Until then the limit of 20mg/m³ shall apply.

Note 2: The emission limit requirements apply from 1 January 2030, unless otherwise advised by the Environment Agency or the boiler is replaced

Note 3: The monitoring requirements apply from 1 January 2030, unless otherwise advised by the Environment Agency or the boiler is replaced

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
SW1 [Point SW1 on site plan in schedule 7] emission to ditch	Surface water runoff from site surfaces, roofs and vehicle wash area via an interceptor	Visible oil and grease	No visible oil and grease	Instantaneous	Weekly ^[Note1]	Visual inspection
SW2 [Point SW2 on site plan in schedule 7] emission to ditch	Uncontaminated surface water runoff from roofs	No parameters set	No limit set	---	---	---

Note 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.

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	A1, A2, and A3	Every 12 months	1 January
	A4	First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter.	From first monitoring requirements in accordance with Condition 3.1.4

Parameter	Units
Compound feed	tonnes

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Specific water usage (yearly average)	Annually	m ³ /tonne of products
Energy usage	Annually	MWh
Specific energy consumption (yearly average)	Annually	MWh/ tonne of products
Waste	Annually	tonnes

Parameter	Reporting form	Form version number and date
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	

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

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

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

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

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

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

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

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

“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 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.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW. An “existing medium combustion plant” is combustion plant operating before 20 December 2018.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Pests” means Birds, Vermin and Insects.

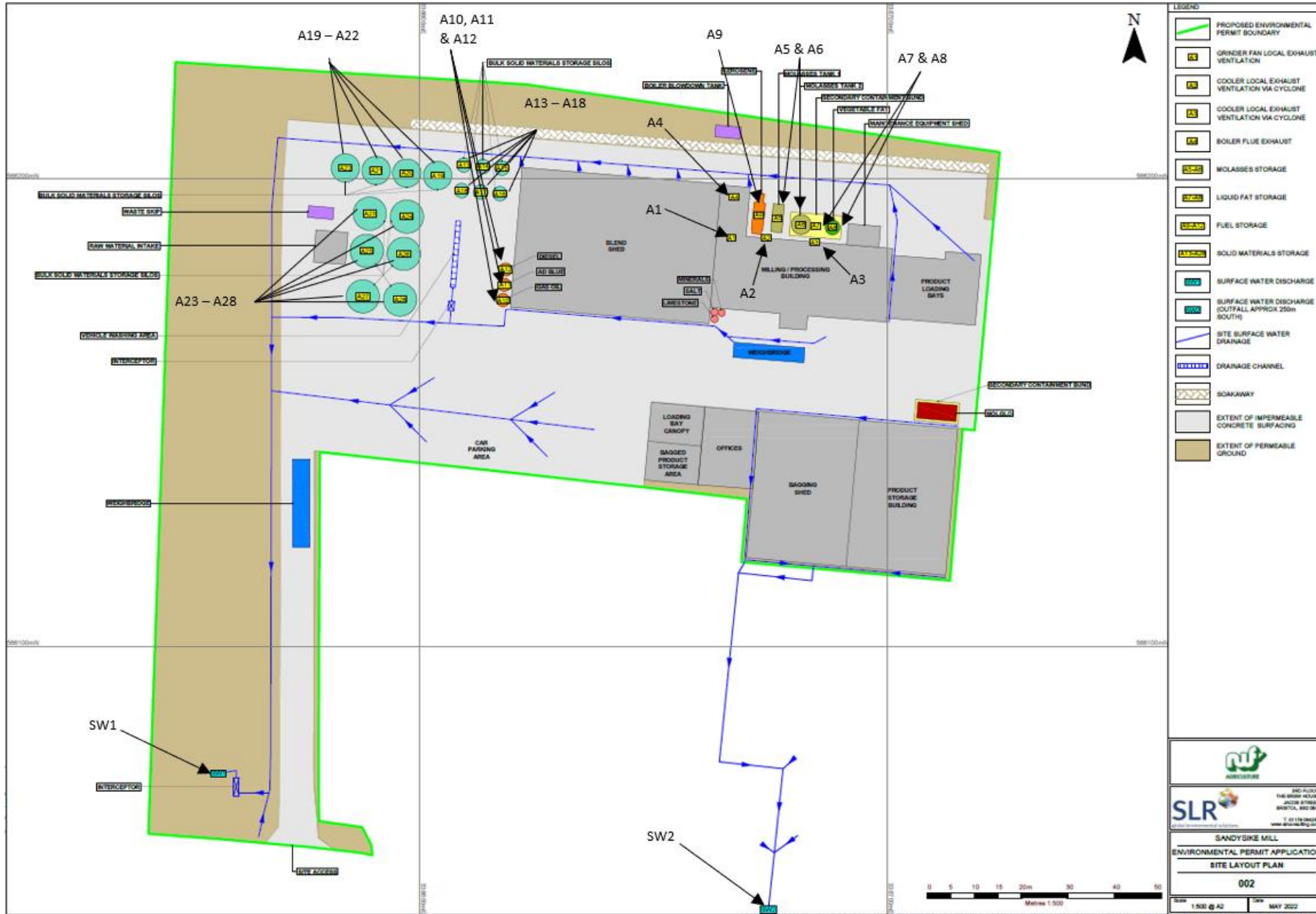
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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 or gas turbines, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous 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



END OF PERMIT