

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Bakkavor Foods Limited
Bakkavor Pizza Holbeach
Sluice Road
Holbeach St Marks
Spalding
Lincolnshire
PE12 8HF

Permit number

EPR/KP3708MT

Bakkavor Pizza Holbeach

Permit number EPR/KP3708MT

Introductory note

This introductory note does not form a part of the permit

The main features of the permit are as follows.

The Bakkavour Pizza site is an existing production facility which produces chilled, ready to cook pizza. The site produces 75 million units a year and operates 24 hours a day, 7 days a week, 365 days a year. The site is located 6.6Km north of the town of Holbeach and 13km north east of the town of Spalding (centred on NGR TF 34984 31780).

The site consists of the main process building, where the assembly of the pizzas takes place. The bakery area contains three travelling in-line ovens which are run on LPG. There are three production lines within the bakery which all have dough mixing facilities. Once the dough has been mixed and proved the dough is cut and shaped into bases. The bases move along the traveling oven and blast freezer before reaching the assembly lines via direct feed. There are five assembly lines three of which are fed directly from the bakery with the other lines fed manually from stock held in the assembly chillers. The packing area consists of eight lines, five of which come from the assembly area carrying the finished product and three from the bakery carrying frozen pizza for storage. The site has exceeded the 75 tonnes per day production capacity, which requires the business to have a bespoke Environmental Permit to operate. The maximum daily theoretical production capacity for the site is 90 tonnes per day

The site operates under scheduled activity Section 6.8 Part A(1)(d)(iii)(aa). *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) — animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than (aa) 75 if A is equal to 10 or more, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.*

The site previously discharged treated effluent to the Holbeach River (W1) under a discharge consent, the permitting of the site has brought the operation of the effluent treatment plant into regulation as a listed activity. Section 5.4 Part A(1)(a)(i). *Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment (i) biological treatment.*

Emissions to air are from the onsite boiler which has a thermal input of 3.55 MWth and is operated on kerosene, the boiler is due to be decommissioned in quarter 1 of 2023. The boiler is considered to be existing under the Medium Combustion Plant Directive (MCPD) and the associated limits have been included within the permit, but future dated for 01/01/2030. In addition, the site has emission from five oven burners each with a thermal input less than 1MWth which fall outside of the MCPD. Detailed dispersion modelling has been undertaken to assess the pollutant emissions to air. The assessment has considered impacts from emissions of Oxides of Nitrogen (NO_x as NO₂) and Particulate Matter (PM₁₀ and PM_{2.5}).

Surface water originating from yard areas drains to one of three gravity fed interceptors to a final pumped interceptor prior to discharge to the River Holbeach (W2). The final pit contains a weir and shut-off valve before the final discharge. For storm water to pass through, it must be pumped pre-weir into the final interceptor before it gravitates out post-weir and past the shut-off valve to open water. This gives the site the ability to contain water on site should there be a pollution event. Roof water is directed to the onsite lagoon which feeds into an interceptor prior to discharge to the River Holbeach (W2).

The site is within the 10km screening distance of the following European habitats The Wash & North Norfolk Coast SAC (Special Area of Conservation), The Wash SPA (Special Protection Area) and The Wash Ramsar. In addition, there is a SSSI (Site of Special Scientific Interest) and two local wildlife sites within 2km of the site.

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

Status log of the permit		
Description	Date	Comments
Application EPR/KP3708MT/A001	Duly made 09/05/2022	Application for a bespoke permit.
Additional information received in response to Schedule 5 Notice dated 26/09/2022	28/10/2022	Schedule 5 response including. <ul style="list-style-type: none"> • Details regarding the on-site effluent treatment plant • Revised risk assessment • Details regarding the onsite combustion processes • Details regarding the onsite surface water drainage arrangements • Site drainage plan • Dust prevention measures • Revised Odour management plan • Revised BAT assessment
Additional information received	31/10/2022	B6 Application Form and associated documentation.
Permit determined EPR/KP3708MT (Billing ref. KP3708MT).	19/12/2022	Permit issued to Bakkavor Foods Limited .

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/KP3708MT

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

Bakkavor Foods Limited (“the operator”),

whose registered office is

**Fitzroy Place
5th Floor
8 Mortimer Street
London
W1T 3JJ**

company registration number 01060806

to operate an installation at

**Bakkavor Pizza Holbeach
Sluice Road
Holbeach St Marks
Spalding
Lincolnshire
PE12 8HF**

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

Name	Date
M Bischer	19/12/2022

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 (AR3) the first monitoring measurements shall be carried out within four months of the issue date of the permit 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.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

- (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit:
 - (a) point source emissions specified in tables S3.1 and S3.2.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

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

4 Information

4.1 Records

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

4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production/treatment data set out in schedule 4 table S4.2; and
- (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:

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

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

4.3 Notifications

4.3.1 In the event:

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

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

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

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 Part A(1) (d)(iii)(aa) animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than 75	Production of chilled food products including washing, mixing, mincing, slicing, cooking, filling and chilling of ingredients and packaging.	From receipt and storage of raw materials to storage and dispatch of finished products. Production capacity up to 90 tonnes per day
AR2	Section 5.4 Part A(1)(a)(i) Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day involving biological treatment	D 8 Biological treatment which results in final compounds or mixtures which are discarded by means of any of the operations numbered D 1 to D 12	From generation of process effluent to discharge to River Holbeach via W1 (Table S3.2) Effluent treatment plant – treatment of waste process waters by physical screening (<1mm), dissolved air flotation (DAF) and chemical dosing (coagulant, pH balancing and flocculation), biological treatment including settlement, aeration and final settlement.
Directly Associated Activity			
AR3	Steam supply	Medium Combustion plants: 1 x 3.55 MWth boiler fired on kerosene	Includes receipt of fuel and usage to emission of combustion gases.
AR4	Ovens	Operation of burners and ovens for production of baked dough. with a combined thermal input of 2.35 MWth fired on LPG	From receipt of fuel to emission of combustion gases.
AR5	Raw material storage and handling	Storage of raw materials for production of baked goods, cleaning and effluent treatment	From receipt of raw materials to use in plant.
AR6	Refrigeration	Ammonia and F-Gas Storage providing cooling and refrigeration of chilled goods	From receipt of raw materials to finished goods.
AR7	Waste storage and handling	Storage and handling of waste materials and by-products from the production of finished goods.	From generation of waste and by-products pending collection for disposal or recovery.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	Application forms Part B2 and B3 and supporting documents including <ul style="list-style-type: none"> • Non-Technical Summary (BFLB2(5c)) • Site Condition Report (BFLB2(5c)) 	Duly Made 09/05/2022
Response to Schedule 5 Notice dated 29/09/2022	Response to the following questions <ol style="list-style-type: none"> 1) Clarification of the onsite effluent treatment plant. 2) Controls in place to prevent the ignition of flour. 3) Clarification of onsite combustion processes 4) Clarification of the surface water discharge arrangements 5) Revised Drainage Plan (P2015-022-04-1-REV E) 6) Dust Prevention Measures (BFLB3(3b) -Environmental Risk Assessment V4) 7) Revised Odour Management Plan (BFLB3(3b) -Odour Management Plan v.2) 8) Revised BAT assessment (BFLB3(3a) -BAT Assessment October 22 v3) 	28/10/2022
Additional information	Application Form B6 and supporting documentation <ul style="list-style-type: none"> • B6 Non-Technical Summary 	31/10/2022

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC1	<p>The Operator shall have regard for the requirements of BATc 4 of the Food, Drink and Milk industries and provide appropriate monitoring data to demonstrate that the concentrations of the relevant parameters (as listed in BATc 12) in the effluent stream are suitably stable in order for the Environment Agency to review the frequency of the monitoring requirements.</p> <p>On submission and review of the data the Environment Agency will advise whether the monitoring of the frequency of the effluent can be reduced to a more suitable frequency.</p>	19/06/2023 or other date as agreed in writing with the Environment Agency

IC2	<p>The operator shall submit, for review 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 12 Table 1 (compliance with BAT-AELs for direct discharges to a receiving water body) <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	04/12/2023 or other date as agreed in writing with the Environment Agency
IC3	<p>The Operator shall submit a written report to the Environment Agency for technical assessment and review detailing the results of a survey of containment provision (primary, secondary and tertiary) for the effluent treatment plant and all associated tanks</p> <p>The report shall make reference to CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises. The survey shall include but not be limited to the following:</p> <ul style="list-style-type: none"> • All process / storage tanks. • Site impermeable surfacing within the effluent treatment plant area • All bunds located within the effluent treatment plant area • All drainage systems, sumps and interceptors within effluent treatment plant area <p>A written report shall be provided to the Environment Agency including details of current containment measures, any deficiencies identified, the improvements proposed and the time scale for implementation.</p> <p>The plan shall be implemented by the operator from the date of approval by the Environment Agency.</p>	19/12/2023 or other date as agreed in writing with the Environment Agency
IC4	<p>The Operator shall submit a written report to the Environment Agency for technical assessment and review detailing the results of a survey of containment provision (primary, secondary and tertiary) for all storage tanks on site.</p> <p>The report shall make reference to CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises. The survey shall include but not be limited to the following:</p> <ul style="list-style-type: none"> • All process / storage tanks. • Site impermeable surfacing. • All bunds located within the installation boundary • All on site drainage systems, sumps and interceptors. <p>A written report shall be provided to the Environment Agency including details of current containment measures, any deficiencies identified, the improvements proposed and the time scale for implementation.</p> <p>The plan shall be implemented by the operator from the date of approval by the Environment Agency.</p>	19/12/2023 or other date as agreed in writing with the Environment Agency

IC5	<p>The Operator shall submit a written Maintenance Plan to the Environment Agency for technical assessment and review. The Maintenance Plan must contain details on the maintenance measures in place for maintenance of the containment measures on site.</p> <p>The plan shall be implemented by the operator from the date of approval by the Environment Agency.</p>	19/12/2023 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]	Boiler Plant 1 fired on kerosene (3.55 MWth)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	650 mg/m ³	Periodic	Every three years	MCERTS BS EN 14792
		Carbon monoxide	No limit set	Periodic	Every three years	EN 15058
A3 [Point A3 on site plan in schedule 7]	Bakery Line 1 Burner 1 fired on LPG (0.470 MWth)	No parameters set	No limit set	--	--	--
A4 [Point A4 on site plan in schedule 7]	Bakery Line 1 Burner 2 fired on LPG (0.470 MWth)	No parameters set	No limit set	--	--	--
A5 [Point A5 on site plan in schedule 7]	Bakery Line 1 Burner 3 fired on LPG (0.470 MWth)	No parameters set	No limit set	--	--	--
A6 [Point A6 on site plan in schedule 7]	Bakery Line 1 Oven Outlet	No parameters set	No limit set	--	--	--
A7 [Point A7 on site plan in schedule 7]	Bakery Line 2 Burner 1 fired on LPG (0.470 MWth)	No parameters set	No limit set	--	--	--
A8 [Point A8 on site plan in schedule 7]	Bakery Line 2 Burner 2 fired on LPG (0.470 MWth)	No parameters set	No limit set	--	--	--
A9 [Point A9 on site plan in schedule 7]	Bakery Line 2 Oven Outlet	No parameters set	No limit set	--	--	--
A10 [Point A10 on site plan in schedule 7]	Bakery Line 3 oven fired on LPG/Wood	No parameters set	No limit set	--	--	--
A11 [Point A11 on site plan in schedule 7]	LEV Extraction	No parameters set	No limit set	--	--	--

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 Note 1	Monitoring standard or method
W1 on site plan in schedule 7 emission to Holbeach River	Effluent Treatment Plant	Total daily volume of discharge	1310 m ³	24-hour total	Continuous	MCERTS self-monitoring of effluent flow scheme
	Effluent Treatment Plant	Flow rate	28 litres/s as an instantaneous maximum flow	Daily Instantaneous	Continuous	MCERTS self-monitoring of effluent flow scheme
	Effluent Treatment Plant	pH	6-8	24-hour flow proportionate composite sample	Monthly	BS6068-2.50
	Effluent Treatment Plant	BOD	20mg/l	24-hour flow proportionate composite sample	Monthly	EN 1899-1
	Effluent Treatment Plant	COD	100mg/l	24-hour flow proportionate composite sample	Daily Note 1	BS ISO 15705
	Effluent Treatment Plant	Total Nitrogen (TKN)	20mg/l	24-hour flow proportionate composite sample	Daily Note 1	BS EN ISO 11905-1 or BS EN 12260
	Effluent Treatment Plant	Total suspended solids	50 mg/l	24-hour flow proportionate composite sample	Daily Note 1	BS EN 872
	Effluent treatment plant	Total Phosphorus	2mg/l	24-hour flow proportionate composite sample	Daily Note 1	BS EN 6878 or BS EN ISO 15681-1/2 or EN ISO 11885
	Effluent treatment plant	No visible oil or grease	None visible	-	Weekly	-
W2 on site plan in schedule 7 emission to Holbeach River	Uncontaminated surface water from yard areas via interceptor	No parameters set	No limit set	--	--	--
<p>Note 1: Monitoring frequency to be reduced to monthly once appropriate monitoring data has been supplied to the Environment Agency to ensure the discharge is sufficiently stable, per BAT 4 of the Food, Drink and Milk Industries BREF. As referenced in IC 1. Prior to reducing the monitoring frequency written agreement is required from the Environment Agency.</p>						

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	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
Point source emissions to water (other than sewer) Parameters as required by condition 3.5.1	W1	Every quarter	1 January, 1 April, 1 July, and 1 October.

Parameter	Units
Finished products	Tonnes of product

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

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
Point source emissions to water (other than sewer)	Emissions to Water 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.

“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



©Crown Copyright. All rights reserved. Environment Agency, 100024198, 2022.

END OF PERMIT