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Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Freemans of Newent Limited

Hereford Animal Feed Mill Tram Inn Allensmore Hereford Herefordshire HR2 9AW

Variation application number

EPR/HP3738JX/V003

Permit number

EPR/HP3738JX

Hereford Animal Feed Mill Permit number EPR/HP3738JX

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 2025 and 2030, as required.

The schedules specify the changes made to the permit.

Hereford Animal Feed Mill converts vegetable-based raw materials into pelletised feed for poultry. The principal processes are raw material offloading and storage; raw material handling; weighing, grinding and mixing; conditioning; pressing and cooling; coating; packaging, storage and despatch. It operates 24 hours per day, five days per week, 52 weeks per year.

The mill takes in mixed grain (wheat, soy, maize, oats and others) plus other feedstock which are then blended and milled. Additives are added after the milling process and then blended again in different proportions to different recipes. The final blend is pushed through formers, chipped into pellets and then cooled, crumbled and sieved before a final fat coating.

Raw materials are unloaded primarily by tipper with some grain blowing. Loading of finished product is via hoppers into bulk haulage vehicles.

The other activities directly associated with the main process are steam generation, waste handling and storage, light engineering and lorry washing. Steam generation is achieved by the use of a biomass boiler rated at 6.2MW. The boiler is fuelled with wood pellets derived from untreated wood defined as Grade A and conforming to ENplus B standard. Grade A waste wood is defined as visibly 'clean' non-hazardous waste wood from the arboriculture sector, packaging waste, scrap pallets, packing cases, cable drums and off-cuts from the manufacture of untreated wood products. The pellets are stored in silos on site.

The site also has a 4.9MW MFO-fired boiler, for back-up.

The most significant atmospheric emissions from the facility arise from the raw material grinders and pellet coolers, which generate dust.

Effluent from the site (rainwater) is passed through the effluent treatment plant and discharged into a small tributary of the Allensmore Brook.

The nearest residential receptor is 100m from the site boundary (250m from the cooler stacks) and the nearest relevant habitat is the River Wye SAC at 5,361m from the installation. There is an Environmental Management System in place at the facility but it is not externally accredited.

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 received | Duly made 17/03/05 | Application for a new animal feed mill permit. | | | |
| Response to request for information | Request date 28/07/05 | Response dated 11/08/05 | | | |
| Response to request for information | Request date 12/09/05 | Response dated 12/09/05 | | | |
| Response to request for information | Request date 30/09/05 | Response dated 30/09/05 | | | |
| Permit determined EPR/BX8335IX | 31/10/05 | Permit issued to Sun Valley Foods Ltd | | | |
| Agency variation determined EPR/BX8335IX/V002 | 05/12/13 | Agency variation to implement the changes introduced by IED | | | |
| Application EPR/BX8335IX/V003 (variation and consolidation) | Duly made 24/02/17 | Application to change the primary heat source for the plant, from medium fuel oil-fired boiler to a biomass boiler. | | | |
| Variation determined EPR/BX8335IX/V003 | 09/05/17 | Varied and consolidated permit issued in modern condition format. | | | |
| Application EPR/HP3738JX/V003 (variation and consolidation) | R61 response received 17/07/21 | Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review. | | | |
| Variation determined and consolidation issued EPR/HP3738JX (Billing ref: DP3106MH) | 17/02/23 | 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/HP3738JX

Issued to

Freemans of Newent Limited ("the operator")

whose registered office is

Grandstand Road Hereford HR4 9PB

company registration number 00745426

to operate a regulated facility at

Hereford Animal Feed Mill Tram Inn Allensmore Hereford Herefordshire HR2 9AW

to the extent set out in the schedules.

The notice shall take effect from 17/02/2023

| Name | Date |
|------------|------------|
| Anne Lloyd | 17/02/2023 |

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/HP3738JX

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/HP3738JX/V003 authorising,

Freemans of Newent Limited ("the operator"),

whose registered office is

Grandstand Road Hereford HR4 9PB

company registration number 00745426

to operate an installation at

Hereford Animal Feed Mill Tram Inn Allensmore

Hereford

Herefordshire

HR2 9AW

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

| Name | Date |
|------------|------------|
| Anne Lloyd | 17/02/2023 |

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").
- 2.1.2 For the following activities referenced in schedule 1, table S1.1 (AR3) Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

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 Waste shall only be accepted if:
 - (a) it is of a type and quantity listed in schedule 2 table(s) S2.2 and
 - (b) it conforms to the description in the documentation supplied by the producer and holder.
- 2.3.5 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.
- 2.3.6 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 and AR4) The first monitoring measurements shall be carried out within four months of 01/01/2025 or 01/01/2030 as specified, 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.

3.4.2 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.

3.7 Fire prevention

- 3.7.1 The operator shall take all appropriate measures to prevent fires on site and minimise the risk of pollution from them including, but not limited to, those specified in any approved fire prevention plan.
- 3.7.2 The operator shall:
 - (a) if notified by the Environment Agency that the activities are giving rise to a risk of fire, submit to the Environment Agency for approval within the period specified, a fire prevention plan which prevents fires and minimises the risk of pollution from fires;
 - (b) implement the fire prevention plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

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

4.2 Reporting

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

4.3 Notifications

4.3.1 In the event:

- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
- (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
- (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

- (a) any change in the operator's trading name, registered name or registered office address; and
- (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
 - (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
 - (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and

(c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

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

Schedule 1 – Operations

| Table S1.1 | activities | | |
|--------------------|--|--|---|
| Activity reference | Activity listed in Schedule 1 of the EP Regulations | Description of specified activity | Limits of specified activity |
| AR1 | Section 6.8 Part A(1) (d) (ii) Treatment and processing of vegetable raw materials intended for the production of feed at plant with a finished product production capacity greater than 300 tonnes per day. | Production of vegetable based animal feed (in the form of crumbs and pellets) | Receipt of raw materials to despatch of finished product. Production capacity is limited to 1,500 tonnes per day. |
| AR2 | Section 5.4 Part A(1)(a)(i) Disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day by biological treatment | Effluent treatment | From generation of process wastewater and surface water to despatch to the unnamed tributary of Allensmore Brook |
| AR3 | Section 5.1 Part B (a) (v) The incineration in a small waste incineration plant with an aggregate capacity of 50kg or more per hour of wood waste with the exception of wood waste which may contain halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coatings. | Steam raising 6.2MWth biomass fired boiler | From receipt and storage of wood biomass to production of steam and combustion products. Untreated wood that contains no halogenated organic compounds or heavy metals as a result of treatment with wood preservatives or coating and which excludes, in particular, such wood waste originating from construction and demolition waste |
| Directly As | sociated Activity | | |
| AR4 | Steam raising plant burning non-waste fuel | Standby MFO boiler rated at 4.9MWth | From receipt and storage of non- waste oil (MFO) to production of steam and combustion products |
| AR5 | Waste storage and handling | Handling, storage, transfer and dispatch of waste from the listed activities and directly associated activities | From the generation of waste to the offsite transfer of waste |

| Description | Parts | Date Received |
|--|--|------------------------|
| Application EPR/BX8335IX/V001 | Sections 2.2.3. 2.2.15, 2.2.44, 2.2.50, 2.10.19 Installation activities and additional supporting information. | Duly Made 17/03/05 |
| Additional information | Further Information Letter dated 11/08/05 Section 1 - Emissions to air and water Section 5 - vegetable oil dust suppression technique Section 7 - aqueous streams and use of oil/water interceptor | 11/08/05 |
| Improvement | IC1 –Surfacing and Containment assessment | 27/04/06 |
| Condition Submissions | IC2 – Air monitoring programme Points A5 and A6 | 19/06/06 |
| Capitiliodionio | IC3 – Emissions to air H1 assessment for monitoring Points A5 and A6 | 02/11/06 |
| | IC4 – Abatement Plant Operational Instructions | 29/09/06 |
| | IC5 - Air monitoring programme Points A12 and A13 | 19/06/06 |
| | IC6 – Emissions to water H1 assessment for monitoring point W1 | 02/11/06 |
| | IC7 – Performance report pH continuous monitoring meter | 27/07/07 |
| | IC8 – Performance report continuous flow meter | 11/01/07 |
| | IC9 – Subsurface structures report | 19/04/07 & 17/07/07 |
| | IC10 – Effluent Treatment Plant improvements | 02/02/07 |
| | IC11 – Site Closure Plan | 12/04/07 |
| Variation application EPR/BX8335IX/V003 | The response to question 3 of application form C3 and additional supporting information. | Duly Made 24/02/17 |
| Additional information | Wood analysis report and pellet quality standards and requirements to ENPlus B including certification requirements. (Certified ENplus B Standard or equivalent - untreated wood protocol. | 24/02/17 |
| Additional information | Responses to additional questions raised during the determination; | 24/02/17 &23/03/17 |
| | Revised H1 Air Quality Impact Assessment Version 2 Dated March 2017 Ref. 402.06404.00002 Updated site plan that includes point source emissions to air and water Biomass boiler manufacturers data sheet Updated Non-Technical Summary | |
| Additional information | Fire Prevention Plan version 1 dated 25/04/2017 | 28/04/17 |
| IC2 submission | Tram Inn Fuel and Ash Management and Testing | 05/11/19 |
| EPR/HP3738JX/V003 | Regulation 61 Response | 17/07/21 |

| Table S1.3 lm | Table S1.3 Improvement programme requirements | | | | | |
|---------------|--|------------|--|--|--|--|
| Reference | Requirement | Date | | | | |
| IC1 | The operator shall submit to the Environment Agency for written agreement a report detailing operating techniques for the biomass boiler. This should contain process diagrams, process controls and description of plant systems and equipment with a detailed description of the process from the import of biomass through to the emissions to air, production of steam and the removal of combustion residues. The report should also cover routine/non-routine use of the standby boiler and contingency planning in the event of extended biomass storage. The report should also detail unloading, storage and handling of biomass, (including monitoring of biomass storage temperature) and the handling, reduction and re-use/disposal of combustion residues (ash collection, storage and disposal). Provide further information of the prevention of dust emissions and dust minimisation (or pellet) build up around the plant. | 10/02/2023 | | | | |
| IC2 | The operator shall submit to the Environment Agency for written agreement, quality assurance procedures (waste acceptance) that ensure that any wood pellets to be used as fuel are not contaminated, contains no halogenated organic compounds or heavy metals and exclude wood waste originating from construction and demolition waste. | Complete | | | | |
| IC3 | 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: 1) Methodology for achieving BAT | 04/12/2023 | | | | |
| | Associated targets/timelines for reaching compliance by 4 December 2023 | | | | | |
| | 3) Any alterations to the initial plan (in progress reports). The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 1, BAT 13 and BAT 14. | | | | | |
| | Refer to BAT Conclusions for a full description of the BAT requirement. | | | | | |
| IC4 | 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, A3, A4, A12 & A13; identifying the fractions within the PM10 and PM2.5 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. | 17/02/2024 | | | | |

Schedule 2 – Waste types, raw materials and fuels

| Table S2.1 Raw materials and fuels | |
|------------------------------------|------------------------|
| Raw materials and fuel description | Specification |
| Fuel Oil | < 0.1% sulphur content |

| Table S2.2 Permitte | Table S2.2 Permitted waste types and quantities for combustion in Biomass boiler | | | | |
|---------------------|--|--|--|--|--|
| Maximum quantity | 200 tonnes maximum storage capacity. 6760 tonnes per annum. | | | | |
| Waste code | Description | | | | |
| 02 | Wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing, food preparation and processing | | | | |
| 02 01 | wastes from agriculture, horticulture, aquaculture, forestry, hunting and fishing | | | | |
| 02 01 03 | plant-tissue waste | | | | |
| 02 01 07 | wastes from forestry | | | | |
| 03 | Wastes from wood processing and the production of panels and furniture, pulp, paper and cardboard | | | | |
| 03 01 | wastes from wood processing and the production of panels and furniture | | | | |
| 03 01 01 | waste bark and cork | | | | |
| 03 01 05 | sawdust, shavings, cuttings, wood, particle board and veneer other than those mentioned in 03 01 04 | | | | |
| 03 03 | wastes from pulp, paper and cardboard production and processing | | | | |
| 03 03 01 | waste bark and wood | | | | |

Schedule 3 – Emissions and monitoring

| 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 | Cooler stack 1 via dust separation unit | Particulate matter | 20 mg/m ³ | Average over sampling period | Annually | BS EN 13284-1 |
| A2 – Point A2 on site plan in Schedule 7 | Cooler stack 2 via dust separation unit | Particulate matter | 20 mg/m3 | Average over sampling period | Annually | BS EN 13284-1 |
| A3 – Point A3 on site plan in Schedule 7 | Cooler stack 3 via 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 | Cooler stack 4 via dust separation unit | Particulate matter | 20 mg/m ³ | Average over sampling period | Annually | BS EN 13284-1 |
| A5 – Standby boiler stack on site plan in Schedule 7 | Steam raising MFO boiler via stack [Note 1] | Oxides of nitrogen (NO and NO ₂ expressed as NO ₂) | 200 mg/m ³ | Periodic | Every three years | EN 14792 |
| | | Carbon monoxide | No limit set | Periodic | Every three years | EN 15058 |
| A6 – Biomass boiler stack on site plan in Schedule 7 | Steam raising biomass boiler via stack [Note 2] | Oxides of nitrogen (NO and NO ₂ expressed as NO ₂) | 650 mg/m ³ | Periodic | Every three years | EN 14792 |
| | | Particulate matter | 50 mg/m ³ | Periodic | Every three years | BS EN 13284-1 |
| | | Carbon monoxide | No limit set | Periodic | Every three years | EN 15058 |
| A7 – A9 Intakes on site plan in Schedule 7 | Raw material intakes via fabric filter | No parameters set | No limit set | | | |
| A10 – Intake on site plan in Schedule 7 | Wheat Store intake via fabric filter | No parameters set | No limit set | | | |
| A11 – Finished Product on site plan in Schedule 7 | Finished product out loading | No parameters set | No limit set | | | |
| A12 - Grinder Filter on site plan in Schedule 7 | Raw material grinding via fabric filter | Particulate matter | 10 mg/m ³ | Average over sampling period | Annually | BS EN 13284-1 |

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements | | | | | | |
|--|---|--------------------|----------------------|------------------------------|----------|---------------|
| Emission point ref. & Source Parameter Limit (including unit) Reference period frequency Monitoring standard or method | | | | | | |
| A13 - Grinder Filter on site plan in Schedule 7 | Raw material grinding via fabric filter | Particulate matter | 10 mg/m ³ | Average over sampling period | Annually | BS EN 13284-1 |

Note 1: Limits and monitoring requirements are effective from 01/01/2030, unless the plant is replaced.

Note 2: Limits and monitoring requirements are effective from 01/01/2025, unless the plant is replaced.

| Table S3.2 Point Source | 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 |
| | All aqueous streams from the installations | Total suspended solids | 40 mg/ml | Spot Sample | Monthly | BS EN 872 |
| site plan in Schedule 7 | including site surface water drainage, foul and process effluent via interceptor and effluent treatment plant | Mercury and its compounds, expressed as mercury (Total Hg) | 0.0001 mg/l | Spot Sample | Annual | BS EN ISO 17852 |
| | | Cadmium and its compounds, expressed as cadmium (Total Cd) | 0.01 mg/l | Spot Sample | Annual | BS EN ISO 17294 BS EN ISO 5961 BS EN ISO 1185 |
| | | pН | 6-9 | Instantaneous | Continuous | BS6068-2.50 |
| | Biochemical Oxygen Demand (BOD5) | 20 mg/l | Spot Sample | Monthly | BS EN 1899-1 BS EN 1899-2 SCA blue book 130 ISBN 0117522120 | |
| | | Total daily volume of discharge | No limit set | 24-hour total | Continuous | MCERTS self- monitoring of effluent flow scheme |

Schedule 4 – Reporting

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

| Table S4.1 Reporting of monitoring data | | | | | | |
|--|--|---|---|--|--|--|
| Parameter | Emission or monitoring point/reference | Reporting period | Period begins | | | |
| Point source emissions to air | A1, A2, A3, A4, A12, A13 | Every 12 months | 1 January | | | |
| Parameters as required by condition 3.5.1 | A5 & A6 | First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter, when effective. | From first monitoring requirements in accordance with Condition 3.1.4 | | | |
| Point source emissions to water (other than sewer) | W1 | Every 3 months | 1 January, 1 April, 1 July, 1 October | | | |
| Parameters as required by condition 3.5.1 | | | | | | |

| Table S4.2: Annual production/treatment | |
|---|--------|
| Parameter | Units |
| Compound feed | Tonnes |

| Table S4.3 Performance parameters | | |
|--|-------------------------|-----------------------------------|
| 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 |
| Wood pellets | Annually | Tonnes |

| Table S4.4 Reporting forms | | |
|--|---|------------------------------|
| Parameter | Reporting form | Form version number and date |
| Point source emissions to air | Air1 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) | Water1 Reporting Form, or other form as agreed in writing by the Environment Agency | Version 1, 08/03/2021 |
| Water usage | Water Usage1 Reporting Form, or other form as agreed in writing by the Environment Agency | Version 1, 08/03/2021 |

| Table S4.4 Reporting forms | | |
|------------------------------|--|------------------------------|
| Parameter | Reporting form | Form version number and date |
| Energy usage | Energy Usage1 Reporting Form, or other form as agreed in writing by the Environment Agency | Version 1, 08/03/2021 |
| Other performance parameters | Performance1 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

| I all A | |
|--|--|
| Permit Number | |
| Name of operator | |
| Location of Facility | |
| Time and date of the detection | |
| | |
| | any malfunction, breakdown or failure of equipment or techniques, nce not controlled by an emission limit which has caused, is pollution |
| To be notified within 24 hours of | detection |
| Date and time of the event | |
| Reference or description of the location of the event | |
| Description of where any release into the environment took place | |
| Substances(s) potentially released | |
| Best estimate of the quantity or rate of release of substances | |
| Measures taken, or intended to be taken, to stop any emission | |
| Description of the failure or accident. | |
| | |
| (b) Notification requirements for t | the breach of a limit |
| To be notified within 24 hours of | detection unless otherwise specified below |
| Emission point reference/ source | |
| Parameter(s) | |
| Limit | |
| Measured value and uncertainty | |
| Date and time of monitoring | |

| (1) 21 (15) | | |
|---|---|----------------------|
| (b) Notification requirements for the breach of a limit | | |
| To be notified within 24 hours of | detection unless otherwise specified be | low |
| Measures taken, or intended to be taken, to stop the emission | | |
| | | |
| Time periods for notification follo | owing detection of a breach of a limit | |
| Parameter | Parameter Notification per | |
| | | |
| | | |
| | | |
| | | |
| (c) Notification requirements for | the breach of permit conditions not relat | ted to limits |
| To be notified within 24 hours of de | tection | |
| Condition breached | | |
| Date, time and duration of breach | | |
| Details of the permit breach i.e. what happened including impacts observed. | | |
| Measures taken, or intended to be taken, to restore permit compliance. | | |
| | | |
| (d) Notification requirements for | the 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.

"disposal" means any of the operations provided for in Annex I to the Waste Framework Directive.

"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.

"Hazardous property" has the meaning in Annex III of the Waste Framework Directive.

"Hazardous waste" has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

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

"List of Wastes" means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste.

"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.

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

"recovery" means any of the operations provided for in Annex II to the Waste Framework Directive.

"Waste code" means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

"Waste Framework Directive" or "WFD" means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

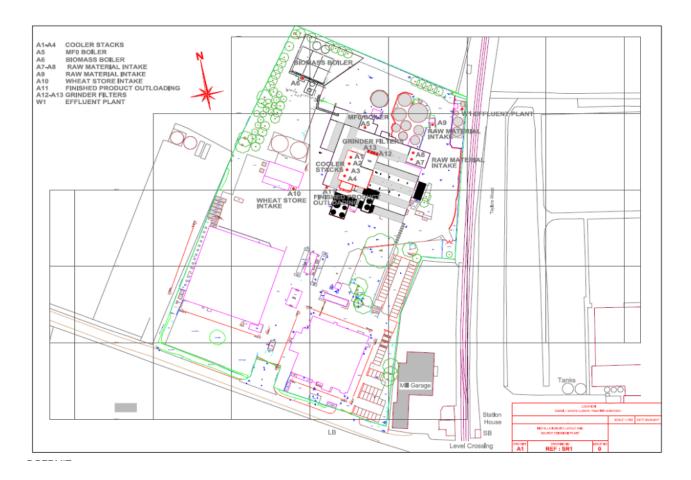
"year" means calendar year ending 31 December.

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

Schedule 7 – Site plan



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