

# Notice of variation and consolidation with introductory note

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

---

ADM Milling Limited

Avonmouth Mill  
Hosegoods Mill  
Old Dock  
Avonmouth  
Bristol  
BS11 9DL

**Variation application number**

EPR/BM8916ID/V003

**Permit number**

EPR/BM8916ID

# Avonmouth Mill

## Permit number EPR/BM8916ID

### 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 4<sup>th</sup> December 2019 in the official journal of the European Union.

The schedules specify the changes made to the permit.

The installation is located on dock land between Avonmouth Dock to the east and the River Avon to the west, the facility is centred at National Grid Reference ST 51318 77758. The facility converts wheat into flour and co-products (animal feeds).

The Environmental Permit is for the following scheduled activities:

Section 6.8 Part A(1)(d)(ii) - Treatment and processing of vegetable raw materials for the intended production of flour and associated co-products at a plant with a finished product capacity greater than 300 tonnes per day.

There are four main processes on site:

- Handling and storage of raw materials – wheat arrives in bulk tankers by road and is stored in wheat silos;
- Raw material preparation – cleaning the wheat using dry methods involving the use of machinery which affects separation by size, shape, density and use of air streams;
- Size reduction by milling – grinding the wheat and reduction in particle size of its constituents; and
- Transport and packing – conveying of finished products using fully enclosed dust tight pneumatic and mechanical conveying equipment.

Production capacity is 350 tonnes per day. Manufacturing is carried out up to 24 hours a day 7 days a week.

The main releases to air consist of particulate matter arising from the production process, there are 20 point-source emissions to air from the installation. These discharge points have been fitted with cyclones and filter bags abatement systems to reduce the particulate matter emitted to the atmosphere.

The installation discharges uncontaminated surface water runoff to the Avonmouth Dock and River Avon. The site also discharges silo compressor condensate to the River Avon via an oil and water separator.

There is a 0.1MWth LPG-fired boiler on site which produces steam in the onsite test bakery, there are no permitting requirements associated with the boiler as it is not involved in the permitted industrial process. The site also treats the blowdown and domestic effluent via a biodigester treatment plant prior to being discharged to the River Avon (emission point W3) these will not be referenced in this permit further as these are regulated under a discharge consent.

The Severn Estuary SAC, SPA and Ramsar and the Avon Gorge Woodland SAC are located within 10km of the site. The Severn Estuary SSSI, a Local Nature Reserve and 14 Local Wildlife Sites are located within 2km of the site.

The installation holds a Climate Change Levy Agreement.

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

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application received EPR/BM8916ID/A001	Duly made 18/03/2005	Application for a grain milling site.
Additional information received	27/06/2005	
Permit determined	19/10/2005	Permit issued to ADM Milling Limited.
Application variation EPR/BM8916ID/V002	Duly made 26/01/2011	
Variation issued EPR/BM8916ID	04/04/2011	
Application EPR/BM8916ID/V003 (variation and consolidation)	Regulation 61 Notice response received 26/05/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Request for further information dated 12/01/2023	Response received 17/01/2023	Further information regarding water emission points and air emissions including an updated air emissions plan.
Additional information received	22/02/2023	Operator provided updated: <ul style="list-style-type: none"> <li>• R61 response tool</li> <li>• Emission point plan</li> </ul>
Variation determined and consolidation issued EPR/BM8916ID (Billing ref. EP3747JS)	27/02/2023	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/BM8916ID

### Issued to

**ADM Milling Limited** (“the operator”)

whose registered office is

**Church Manorway**

**Erith**

**Kent**

**DA8 1DL**

company registration number 02445197

to operate a regulated facility at

**Avonmouth Mill**

**Hosegoods Mill**

**Old Dock**

**Avonmouth**

**Bristol**

**BS11 9DL**

to the extent set out in the schedules.

The notice shall take effect from 27/02/2023.

Name	Date
Anne Lloyd	27/02/2023

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/BM8916ID**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BM8916ID/V003 authorising,

**ADM Milling Limited** (“the operator”),

whose registered office is

**Church Manorway**

**Erith**

**Kent**

**DA8 1DL**

company registration number 02445197

to operate an installation at

**Avonmouth Mill**

**Hosegoods Mill**

**Old Dock**

**Avonmouth**

**Bristol**

**BS11 9DL**

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

Name	Date
Anne Lloyd	27/02/2023

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”).

### **2.2 The site**

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
  - (b) the composition of the waste;
  - (c) the handling requirements of the waste;
  - (d) the hazardous property associated with the waste, if applicable; and
  - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

### **2.4 Improvement programme**

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.



## **3 Emissions and monitoring**

### **3.1 Emissions to water, air or land**

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

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

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 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 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.
- 3.5.3 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

<b>Table S1.1 activities</b>			
<b>Activity reference</b>	<b>Activity listed in Schedule 1 of the EP Regulations</b>	<b>Description of specified activity</b>	<b>Limits of specified activity</b>
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 350 tonnes per day.
<b>Directly Associated Activity</b>			
AR2	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR3	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the River Avon and Avonmouth Dock.

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application EPR/BM8961ID/A001	The response to questions 2.1 and 2.2 and 2.10 given in sections B2.1.17, B2.2.1-B2.2.4, B2.2.13, B2.2.15 and B2.10.19-B2.10.22 of the application	18/03/2005
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	Received 26/05/2022

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
IC5	The Operator shall submit for approval updated sections of the Environment Management System (EMS), which are relevant to demonstrate compliance with BATc1 ii) and xv). The relevant sections of the EMS shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 1.  Refer to BAT Conclusions for a full description of the BAT requirement.	04/12/2023
IC6	The operator shall submit, for approval by the Environment Agency, a monitoring procedure for particulate matter emissions from principal emission points on site. The procedure must describe how the operator	04/06/2023

<b>Table S1.3 Improvement programme requirements</b>		
<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
	<p>will implement a rolling monitoring programme which shall include, but not be limited to the following:</p> <ol style="list-style-type: none"> <li>1. Methodology for how representative monitoring will be carried out annually, with a minimum of 3 point sources on a rolling-basis.</li> <li>2. Ensuring the key process stages, wheat cleaning, wheat milling and finished product handling including wheatfeed, are prioritised.</li> <li>3. Identify any principal emission points excluded from the rolling monitoring programme and provide a justification for this.</li> <li>4. Provide a commencement date for the programme which will demonstrate compliance with the permit requirements.</li> </ol> <p>The monitoring procedure shall address the requirements of BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 5.</p>	

## 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 Air Emissions Point Plan in Schedule 7)	Gen Silo conv exhaust stack with cyclone and bag filter	Particulate matter	No limit set	--	--	--
A2 (Point A2 on Air Emissions Point Plan in Schedule 7)	Screening stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A3 (Point A3 on Air Emissions Point Plan in Schedule 7)	Screen room cleaning stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A4 (Point A4 on Air Emissions Point Plan in Schedule 7)	Screen room cleaning stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A5 (Point A5 on Air Emissions Point Plan in Schedule 7)	Destoners stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A6 (Point A6 on Air Emissions Point Plan in Schedule 7)	Wheat transfer to mill stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A7 (Point A7 on Air Emissions Point Plan in Schedule 7)	Pneumatics stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A8 (Point A8 on Air Emissions Point Plan in Schedule 7)	Pneumatics stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A9 (Point A9 on Air Emissions Point Plan in Schedule 7)	Purifiers stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1



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

<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (including unit)</b>	<b>Reference period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
A10 (Point A10 on Air Emissions Point Plan in Schedule 7)	Pneumatics positive stack with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A11 (Point A11 on Air Emissions Point Plan in Schedule 7)	Creta intake stack with cyclone and bag filter	Particulate matter	No limit set	--	--	--
A12 – A13 (Points A12 and A13 on Air Emissions Point Plan in Schedule 7)	White start-up and low grade bin exhaust stack with cyclone and bag filter	Particulate matter	No limit set	--	--	--
A14 (Point A14 on Air Emissions Point Plan in Schedule 7)	Gen exhaust silo bin stacks with cyclone and bag filter	Particulate matter	No limit set	--	--	--
A15 (Point A15 on Air Emissions Point Plan in Schedule 7)	Gen exhaust from wheatfeed transfer and silo bin with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A16 (Point A16 on Air Emissions Point Plan in Schedule 7)	Gen exhaust from wheatfeed transfer and silo bin with cyclone and bag filter	Particulate matter	5 mg/m <sup>3</sup> [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A19 (Point A19 on Air Emissions Point Plan in Schedule 7)	Flour transfer bins exhaust 636 stack with cyclone and bag filter	Particulate matter	No limit set	--	--	--
A20 (Point A20 on Air Emissions Point Plan in Schedule 7)	Flour transfer bins exhaust 617 stack with cyclone and bag filter	Particulate matter	No limit set	--	--	--

NOTE 1 – The emission limit applies from 4 December 2023.

NOTE 2 – Average value of three consecutive measurements of at least 30 minutes each.

NOTE 3 – The monitoring frequency shall be in line with the rolling monitoring procedure, as agreed in IC6.

<b>Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements</b>						
<b>Emission point ref. &amp; location</b>	<b>Source</b>	<b>Parameter</b>	<b>Limit (incl. unit)</b>	<b>Reference Period</b>	<b>Monitoring frequency</b>	<b>Monitoring standard or method</b>
W1 on water emission point plan in schedule 7 emission to Avonmouth Dock	Uncontaminated surface water runoff from hardstanding	No parameters set	No limit set	-	-	-
W2 on water emission point plan in schedule 7 emission to Avonmouth Dock	Uncontaminated surface water runoff from hardstanding	No parameters set	No limit set	-	-	-
W3 on water emission point plan in schedule 7 emission to River Avon	Uncontaminated surface water runoff from hardstanding	No parameters set	No limit set	-	-	-
	Silo compressor condensate via an oil and water separator					
W4 on water emission point plan in schedule 7 emission to River Avon	Uncontaminated surface water runoff from packing and warehouse roof	No parameters set	No limit set	-	-	-

## Schedule 4 – Reporting

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

<b>Table S4.1 Reporting of monitoring data</b>			
<b>Parameter</b>	<b>Emission or monitoring point/reference</b>	<b>Reporting period</b>	<b>Period begins</b>
Point source emissions to air Parameters as required by condition 3.5.1	A2, A3, A4, A5, A6, A7, A8, A9, A10, A15, A16	Every 12 months (in accordance with the rolling monitoring procedure, as agreed in IC6)	1 January

<b>Table S4.2: Annual production/treatment</b>	
<b>Parameter</b>	<b>Units</b>
Flour produced	tonnes
Flour co-products produced	tonnes

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

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

# Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

## Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

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

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

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

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

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

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

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

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

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

Name*	
Post	
Signature	
Date	

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

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

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

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

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“emissions of substances not controlled by emission limits” means emissions of substances to air, water or land from the activities, either from the emission points specified in schedule 3 or from other localised or diffuse sources, which are not controlled by an emission limit.

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

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

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Pests” means Birds, Vermin and Insects.

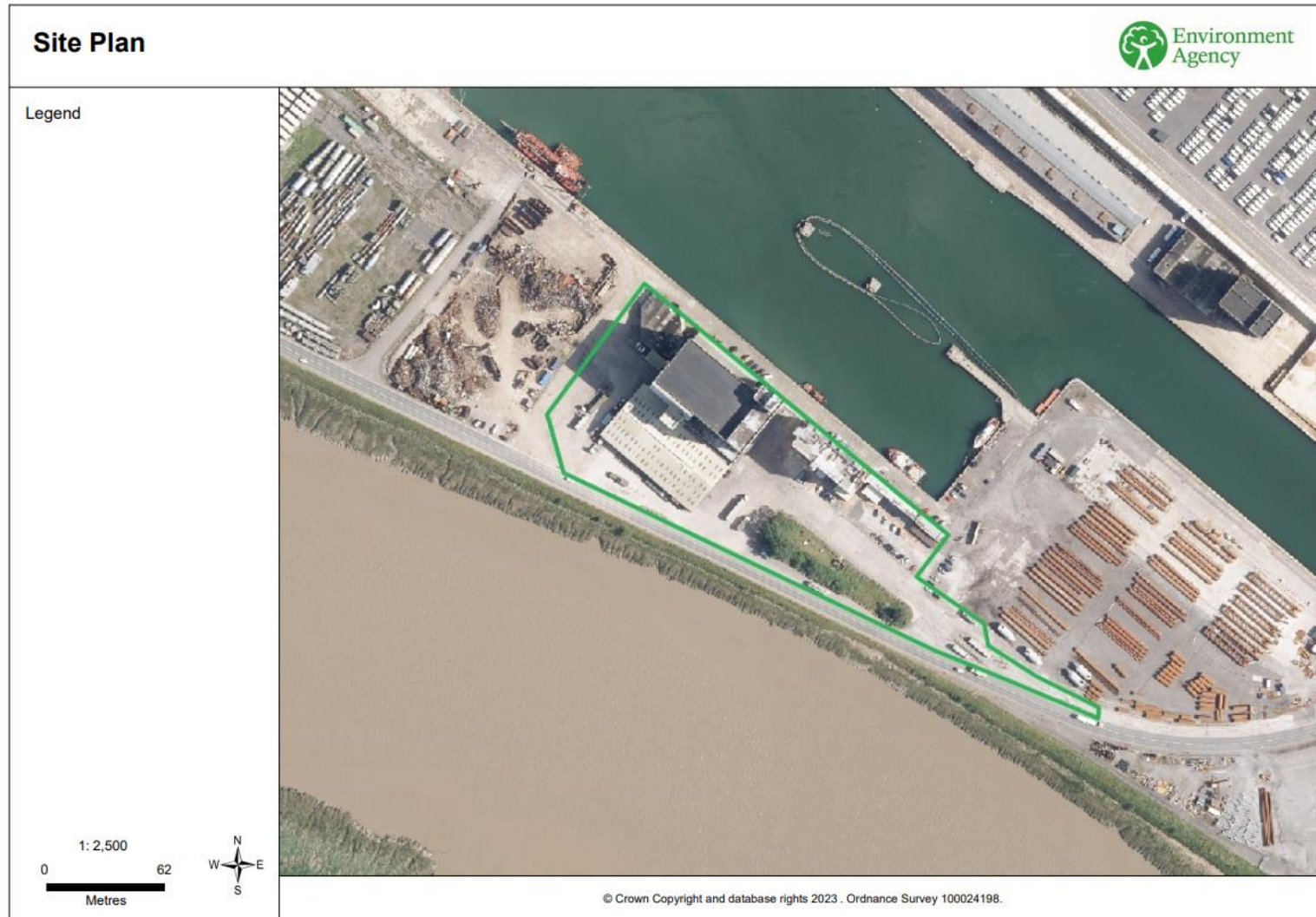
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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

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

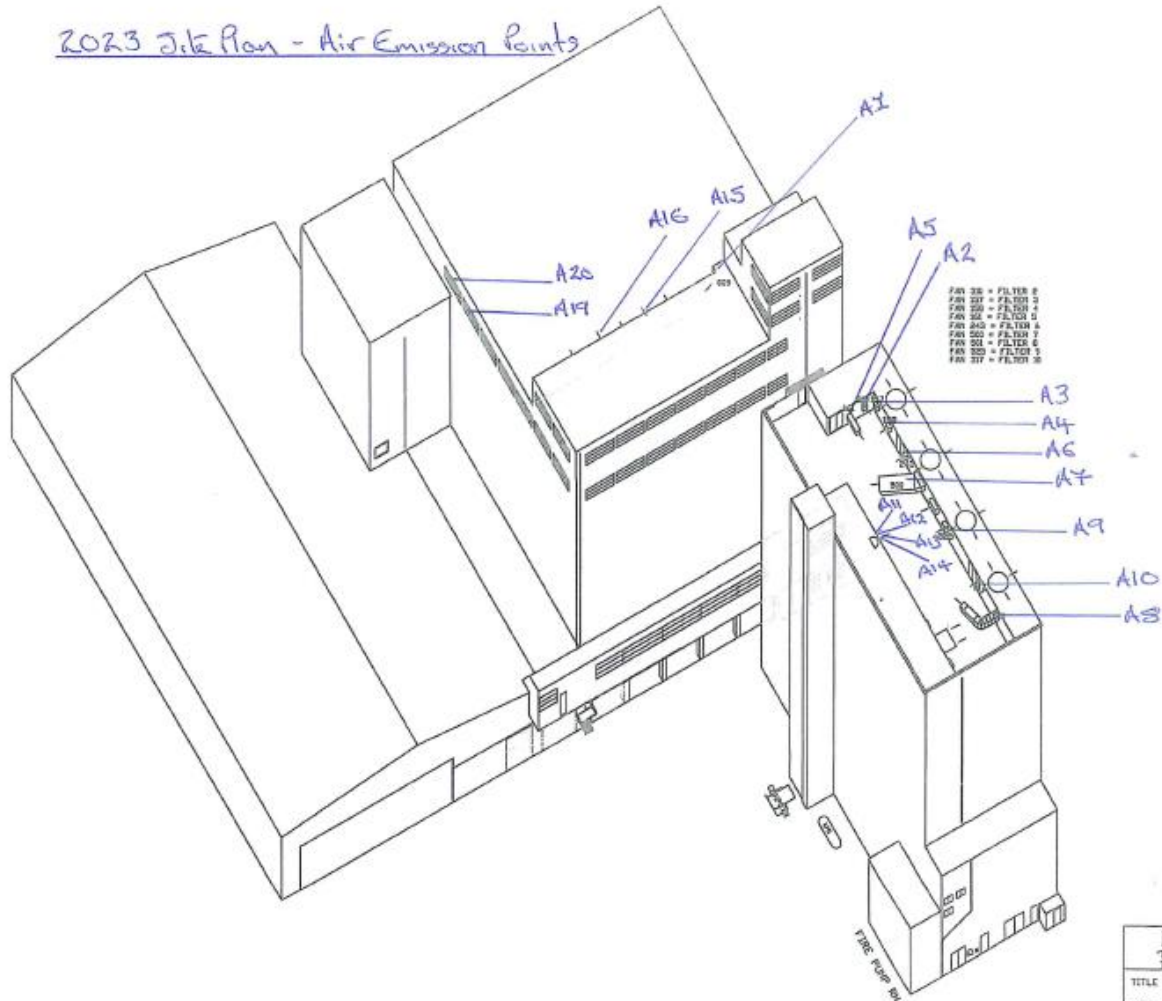
“year” means calendar year ending 31 December.

# Schedule 7 – Site plan



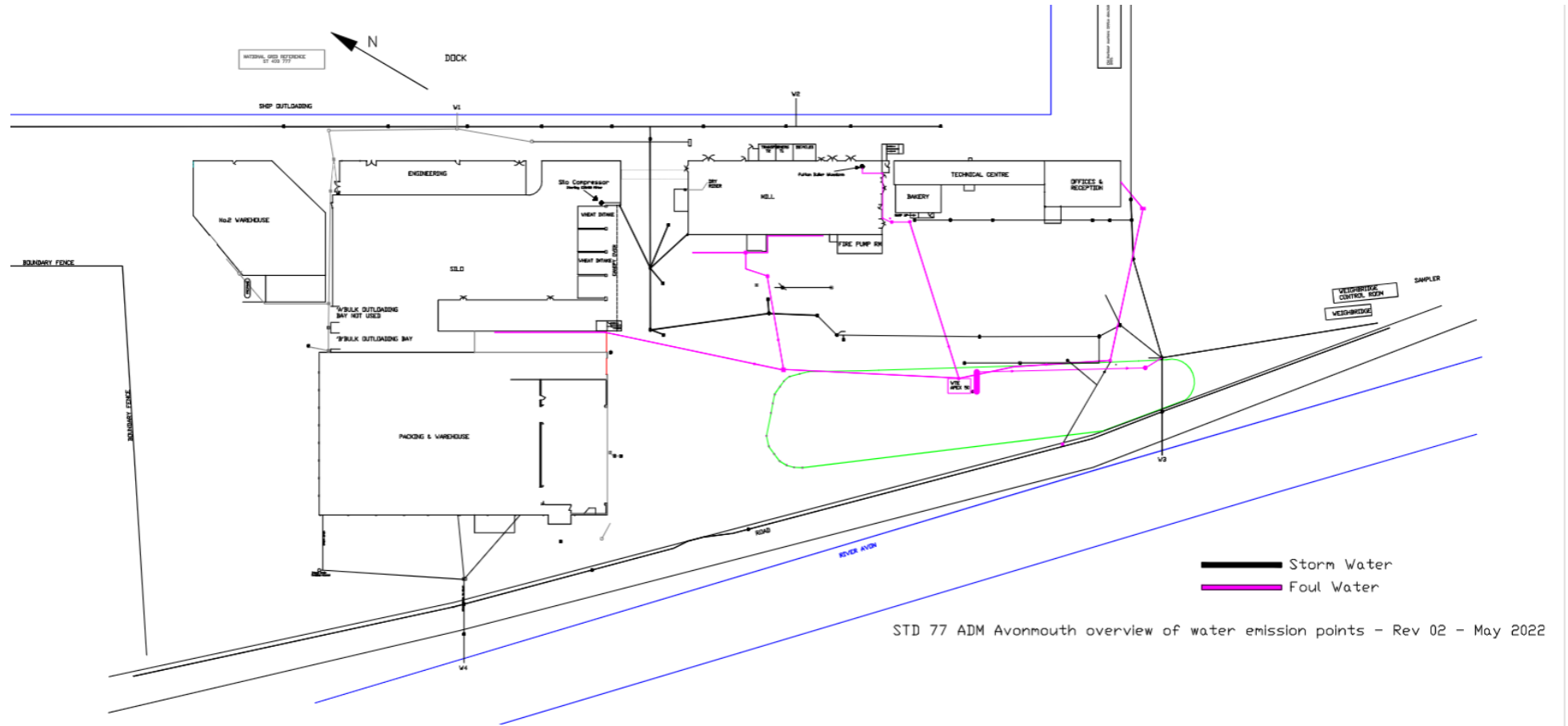


Air Emissions Point Plan



<b>M.T.H. ELECTRICAL (DURSLEY)</b>			
THE CROFT, ECHO LAKE, STONCHOMBE BURLLEY GLOS. GL11 4DJ			
TELEPHONE 01453 342336 E-MAIL mt@mtelnet.co.uk			
TITLE ADM MILL ISOMETRIC VIEW			
SITE OLD DOCK AVONMOUTH			
CONTRACT No.	REV 1	DRAWING No.	SHEET 1/1
REVISION 1	REVISION 2	DRAWN	SCALE
		TRACES	MIS
ORIGINAL ISSUE		CHECKED	DATE

# Water Emission Point Plan



STD 77 ADM Avonmouth overview of water emission points - Rev 02 - May 2022

END OF PERMIT



**Signed:**     *[Name]*

**Date:**       *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

---

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

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

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

## Water Usage Reporting Form

Permit number: *EPR/BM8916ID/V003*

Operator: *ADM Milling Limited*

Facility name: *Avonmouth Mill*

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

Reporting of water usage for the year [YYYY]

<b>Water source</b>	<b>Water usage (m<sup>3</sup>)</b>	<b>Specific water usage (m<sup>3</sup>/tonne of product) <sup>2</sup></b>
Mains water	<i>[insert annual usage in m<sup>3</sup> where mains water is used]</i>	Not Applicable
Site borehole	<i>[insert annual usage in m<sup>3</sup> where water is used from a site borehole]</i>	Not Applicable
River abstraction	<i>[insert annual usage in m<sup>3</sup> where abstracted river water is used]</i>	Not Applicable
Other – <i>[specify other water source where applicable]. Add extra rows where needed]</i>	<i>[insert annual usage in m<sup>3</sup> where applicable]</i>	Not Applicable
Total water usage	<i>[insert total annual water usage in m<sup>3</sup>]</i>	<i>[insert total water use per tonne of product produced m<sup>3</sup>/t]</i>

**Operator's comments**

--

<b>Operator's comments</b>

**Signed:**     *[Name]*

**Date:**       *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

---

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

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

## Energy Usage Reporting Form

**Permit number:** *EPR/BM8916ID/V003*

**Operator:** *ADM Milling Limited*

**Facility name:** *Avonmouth Mill*

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

Reporting of energy usage for the year *[YYYY]*

<b>Energy source</b>	<b>Energy consumption / production (MWh)</b>	<b>Specific energy consumption (MWh/tonne of product) <sup>2</sup></b>
Electricity imported as delivered - source [specify source, e.g. supplied from the national grid]	<i>[insert annual consumption in MWh where electricity is imported]</i>	Not Applicable
Electricity imported as primary energy 1 – conversion factor of [specify conversion factor used to convert electricity delivered to primary energy]	<i>[insert annual consumption in MWh where electricity is imported]</i>	Not Applicable
Natural gas	<i>[insert annual consumption in MWh where natural gas is used]</i>	Not Applicable
Gas oil – conversion factor of [specify conversion factor used to convert tonnes to MWh]	<i>[insert annual consumption in MWh where gas oil is used]</i>	Not Applicable
Imported heat	<i>[insert annual consumption in MWh where heat is imported]</i>	Not Applicable
Other – <i>[specify other energy source and conversion factors where applicable, e.g. renewable fuel. Add extra rows where needed]</i>	<i>[insert annual consumption in MWh where applicable]</i>	Not Applicable
Electricity exported	<i>[insert annual production in MWh where electricity is exported]</i>	Not applicable
Heat exported	<i>[insert annual production in MWh where heat is exported]</i>	Not applicable

Energy source	Energy consumption / production (MWh)	Specific energy consumption (MWh/tonne of product) <sup>2</sup>
Total	<i>[insert total energy use in MWh]</i>	<i>[insert total energy use per tonne of product MWh/tonne of product]</i>

<b>Operator's comments</b>

**Signed:** *[Name]*

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

(Authorised to sign as representative of the operator)

---

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

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

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

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



# Other Performance Parameters Reporting Form

Permit number: *EPR/BM8916ID/V003*

Operator: *ADM Milling Limited*

Facility name: *Avonmouth Mill*

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

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

Parameter	Units
<i>[e.g. Total raw material usage]</i>	<i>[e.g. tonnes per production unit]</i>
Total raw material used	tonnes
Flour produced	tonnes
Flour co-products produced	tonnes
Waste sent for recovery (specify route)	tonnes
Waste sent for recycling (specify route)	tonnes
Total product waste sent for disposal (specify route)	tonnes

<b>Operator's comments</b>

**Signed:** *[Name]*

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

(Authorised to sign as representative of the operator)

---

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