

# Notice of variation and consolidation with introductory note

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

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ADM Milling Limited

Tilbury Flour Mill  
Tilbury Docks  
Tilbury  
Thurrock  
Essex  
RM18 7JU

**Variation application number**

EPR/AP3835RL/V002

**Permit number**

EPR/AP3835RL

# Tilbury Flour Mill

## Permit number EPR/AP3835RL

### 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.

Tilbury Flour Mill produces and distributes flour from this facility, operated by ADM Milling Limited, sited at Tilbury Docks, Essex. The mill installation converts approximately 102,000 tonnes per day of wheat into flour and associated co-products. The facility produces flour products and through the process undertakes handling and storing raw materials, preparing raw material, size reduction by milling, mixing and blending, packaging and storage and transporting the finished products.

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.*

Production capacity is 300 tonnes per day, with manufacturing carried out 24 hours a day 7 days a week.

The main releases to air arise from the production process, there are 22 discharge points to atmosphere. These discharge points have been fitted with filter bags to reduce the particulate matter emitted to the atmosphere. In addition, the products of combustion are emitted to air from the 0.5MWth gas-fired boiler.

The industrial wastewater emissions from the premises are from the vehicle washdown station, boiler blowdown, tank wash and the laboratory are discharged via a 3 stage interceptor to sewer via a trade effluent consent to discharge issued by Anglian Water.

There are emissions of uncontaminated surface water run off discharged to the Botany Channel via Port Tilbury surface water drainage system from the facility, there is no water treatment facility on site.

The closest residential property is approximately 400m northwest of the site boundary. Thames Estuary & Marshes SPA and Ramsar lies within 10km of the installation. The Globe Pit SSSI lies within 2km of the installation boundary.

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<br>EPR/AP3835RL/A001 | Duly made<br>09/03/2017 | Application for an Environmental Permit |

| <b>Status log of the permit</b>  |   |  |
|--|---|--|
| <b>Description</b>   | <b>Date</b>   | <b>Comments</b>  |
| Additional information received  | 18/05/2017  | Response to schedule 5 notice dated 04/05/2017.  |
| Permit determined<br>EPR/AP3835RL  | 20/06/2017  | Permit issued to ADM Milling Limited.  |
| Application EPR/AP3835RL/V002<br>(variation and consolidation)<br>Regulation 61 (1) Notice –<br>Responses to questions | Regulation 61<br>Notice response<br>received on<br>26/05/2022 | Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review. |
| Additional information received  | 24/11/2022  | Clarification on EMS and BATc 1  |
| Additional information received  | 12/01/2023  | Revised Reg 61 response tool, revised site plan and updated EMS policy manual contents                                     |
| Variation determined and consolidation issued<br>EPR/AP3835RL<br>(Billing ref. EP3845QG).                              | 28/02/2023  |  |

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/AP3835RL

### 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

**Tilbury Flour Mill**

**Tilbury Docks**

**Tilbury**

**Thurrock**

**Essex**

**RM18 7JU**

to the extent set out in the schedules.

The notice shall take effect from 28/02/2023

| Name             | Date       |
|------------------|------------|
| Katherine Fisher | 28/02/2023 |

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/AP3835RL**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/AP3835RL/V002 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

**Tilbury Flour Mill**

**Tilbury Docks**

**Tilbury**

**Thurrock**

**Essex**

**RM18 7JU**

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

| <b>Name</b>        | <b>Date</b>       |
|--------------------|-------------------|
| <b>Kate Fisher</b> | <b>28/02/2023</b> |

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, S3.2 and S3.3.



- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

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

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

## **3.3 Odour**

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 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, S3.2, and S3.3;
  - (b) process monitoring requirements specified in table S3.4.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3, unless otherwise agreed in writing by the Environment Agency.

## **3.6 Pests**

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

# **4 Information**

## **4.1 Records**

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

## 4.2 Reporting

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

## 4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
    - (i) inform the Environment Agency,
    - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
    - (iii) take the measures necessary to prevent further possible incidents or accidents;
  - (b) of a breach of any permit condition the operator must immediately—
    - (i) inform the Environment Agency, and
    - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
  - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 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

| <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                                 | Section 6.8 Part A(1)(d)(ii)                               | Treatment and processing of only vegetable raw materials, intended for the production of food or feed at a plant with a finished product production capacity greater than 300 tonnes per day. | From receipt of raw materials to dispatch of finished product.<br>Production capacity is limited to 300 tonnes per day. |
| <b>Directly Associated Activity</b> |  |   |   |
| AR2                                 | Vehicle washing  | Provision of vehicle washing in a designated area.  | From receipt of vehicles on site to discharge of arising effluent to foul drain system via a 3-stage interceptor.       |
| AR3                                 | Surface water drainage                                     | Collection of uncontaminated site surface waters.   | Handling and storage of site drainage until discharge to the site surface water system.                                 |
| AR4                                 | Steam supply   | Steam generation from a gas-fired boiler with a net thermal input of 0.5 MWth   | From receipt of fuel to release of products of combustion to air.   |

| <b>Table S1.2 Operating techniques</b>            |  |                         |
|---|--|-------------------------|
| <b>Description</b>                                | <b>Parts</b>   | <b>Date Received</b>    |
| Application                                       | Answers to Section 3 on EP application form Part B3 including references to the Food and Drink Sector Guidance EPR 6.10.<br>Ref: 3.1 Technical Description<br>Ref: 3.4 Environmental Risk Assessment<br>Ref: 3.5 Aspects and Impacts Review<br>Ref: 3.7 Summary of Energy Procedures<br>Ref: 4.1 ADM Milling UK EMS Overview<br>Ref: 4.4a-d Spillage Procedures (incl. Emergency Procedure)<br>Ref: 4.7 Tilbury Waste Management Procedure<br>Ref: 5.6 CCL Agreement | Duly Made<br>09/03/2017 |
| Response to Schedule 5 Notice dated 04/05/17      | Updated Site Condition Report  | 18/05/2017              |
| Regulation 61 (1) Notice – Responses to questions | All parts and supporting information.  | 26/05/2022              |

| <b>Table S1.3 Improvement programme requirements</b> |  |             |
|--|--|-------------|
| <b>Reference</b>                                     | <b>Requirement</b>   | <b>Date</b> |
| IC2  | <p>The Operator shall submit for approval updated sections of the Environment Management System (EMS), which are relevant to demonstrate compliance with BATc1 (xv). The relevant sections of the EMS shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc1 (xv).</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement</p>  | 04/12/2023  |
| IC3  | <p>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 will implement a rolling monitoring programme which shall include, but not limited to:</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; and</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> | 04/06/2023  |

## 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 [Note 2]    | Monitoring frequency [Note 3] | Monitoring standard or method |
| A1 [Point 1 on Emission points plan]   | Mill aspiration - TS filter L10 807, 808 & 809 with bag filter                  | Particulate matter | No limit set                 | -                            | -                             | -                             |
| A2 [Point 2 on Emission points plan]   | Bin aspiration - TS filter L10 M9001 & M9002 with bag filter                    | Particulate matter | No limit set                 | -                            | -                             | -                             |
| A3 & A4 [Point 3 & 4 on Emission points plan]  | Bin aspiration - Gluten filter L10. 502 and L10. 503 bins with bag filters      | Particulate matter | No limit set                 | -                            | -                             | -                             |
| A5 – A8 [Point 5 – 8 on Emission points plan]  | Mill aspiration - MVRS dust collectors L10 with bag filters                     | Particulate matter | No limit set                 | -                            | -                             | -                             |
| A9 [Point 9 on Emission points plan]   | Wheat cleaning aspiration - 2nd cleaning MVRS dust collector L8 with bag filter | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1] | Average over sampling period | Annually                      | BS EN 13284-1                 |
| A10 [Point 10 on Emission points plan]   | Wheat cleaning aspiration - 1st cleaning MVRS dust collector L8 with bag filter | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]  | Average over sampling period | Annually                      | BS EN 13284-1                 |
| A11 [Point 11 on Emission points plan]   | Mill aspiration - A pneumatic lift MVRS dust collector L5 with bag filter       | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]  | Average over sampling period | Annually                      | BS EN 13284-1                 |
| A12 [Point 12 on Emission points plan]   | Mill aspiration - B pneumatic lift MVRS dust collector L5 with bag filter       | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]  | Average over sampling period | Annually                      | BS EN 13284-1                 |
| A13 [Point 13 on Emission points plan]   | Mill aspiration - Purifier MVRS dust collector L4 with bag filter               | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1] | Average over sampling period | Annually                      | BS EN 13284-1                 |
| A14 [Point 14 on   | Bin aspiration - Filter Bin 302   | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]  | Average over                 | Annually                      | BS EN 13284-1                 |



| <b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b> |  |                    |                               |                                  |                                      |                                      |
|---|--|--------------------|-------------------------------|----------------------------------|--------------------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>  | <b>Parameter</b>   | <b>Limit (including unit)</b> | <b>Reference period [Note 2]</b> | <b>Monitoring frequency [Note 3]</b> | <b>Monitoring standard or method</b> |
| Emission points plan]   | L10 with bag filter  |                    |                               | sampling period                  |                                      |                                      |
| A15 [Point 15 on Emission points plan]  | Bin aspiration - Filter Bin 303 L10 with bag filter                                    | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]   | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A16 [Point 16 on Emission points plan]  | Packing line aspiration - Packing dust collector L3 PB (Packing Block) with bag filter | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]   | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A17 [Point 17 on Emission points plan]  | Bin aspiration - TS filters brown/white TS019 L4 PB with bag filter                    | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1]  | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A17 [Point 17 on Emission points plan]  | Bin aspiration - TS filters brown/white TS018 L4 PB with bag filter                    | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1]  | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A18 [Point 18 on Emission points plan]  | Bin aspiration - TS filter 702-L6 PB with bag filter                                   | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1]  | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A18 [Point 18 on Emission points plan]  | Bin aspiration - TS filter 703 L6 PB   | Particulate Matter | 5mg/[Note 1]                  | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A19 [Point 19 on Emission points plan]  | Bin aspiration - TS filter 704 L6 PB with bag filter                                   | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1]  | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A19 [Point 19 on Emission points plan]  | Bin aspiration - TS filter 701 L6 PB with bag filter                                   | Particulate Matter | 5 mg/m <sup>3</sup> [Note 1]  | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A20 [Point 20 on Emission points plan]  | Bin aspiration - Filter M8009 L6 PB with bag filter                                    | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]   | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A21 [Point 21 on Emission points plan]  | Bulk aspiration - TS filter TS014 Brown out loading with bag filter                    | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]   | Average over sampling period     | Annually                             | BS EN 13284-1                        |
| A22 [Point 22 on Emission points plan]  | Bulk aspiration - TS filter TS015 White  | Particulate Matter | 5mg/m <sup>3</sup> [Note 1]   | Average over sampling period     | Annually                             | BS EN 13284-1                        |

| <b>Table S3.1 Point source emissions to air – emission limits and monitoring requirements</b> |                             |                  |                               |                                  |                                      |                                      |
|---|-----------------------------|------------------|-------------------------------|----------------------------------|--------------------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>               | <b>Parameter</b> | <b>Limit (including unit)</b> | <b>Reference period [Note 2]</b> | <b>Monitoring frequency [Note 3]</b> | <b>Monitoring standard or method</b> |
|   | out loading with bag filter |                  |                               |                                  |                                      |                                      |
| B   | Boiler                      | No parameters    | 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 IC3.

| <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> |
| S1 on site plan in schedule 7 emission to Botany Channel via Port of Tilbury Authority surface water drainage system.       | Uncontaminated surface water run-off (site drainage) | No parameters set | No limits set             | ---                     | ---                         | ---                                  |

| <b>Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– 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> |
| F1 on site plan in schedule 7 emission to Anglian Water Services Limited Tilbury Sewage Treatment Works.   | Boiler blowdown ,laboratory sinks, tank wash and vehicle wash water via oil/water separator. | No parameters set | No limits set             | ---                     | ---                         | ---                                  |
| F2 on site plan in schedule 7 emission to Anglian Water Services Limited Tilbury Sewage Treatment Works.   |  |                   |                           |                         |                             |                                      |

| <b>Table S3.4 Process monitoring requirements</b>                                |   |                             |                                      |                             |
|--|---|-----------------------------|--------------------------------------|-----------------------------|
| <b>Emission point reference or source or description of point of measurement</b> | <b>Parameter</b>  | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> | <b>Other specifications</b> |
| A1 – A22   | A documented visual check of emission points                | Once per shift              | ---                                  | ---                         |
|  | A documented leak detection check of dust abatement systems | Weekly                      | ---                                  | ---                         |

## 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<br>Parameters as required by condition 3.5.1 | A9, A10, A11, A12, A13, A14, A15, A16, A17, A18, A19, A20, A21, A22 | Every 12 months (in accordance with the rolling monitoring procedure, as agreed in IC3) | 1 January            |

| <b>Table S4.2: Annual production/treatment</b> |              |
|--|--------------|
| <b>Parameter</b>                               | <b>Units</b> |
| Flour products                                 | 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> |
| Energy usage                             | Annually                       | MWh            |
| Total raw material used                  | Annually                       | tonnes         |
| Waste                                    | Annually                       | tonnes         |

| <b>Table S4.4 Reporting forms</b> |   |                       |
|-----------------------------------|---|-----------------------|
| <b>Media/parameter</b>            | <b>Reporting form</b>   | <b>Date of form</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 indicators      | 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.

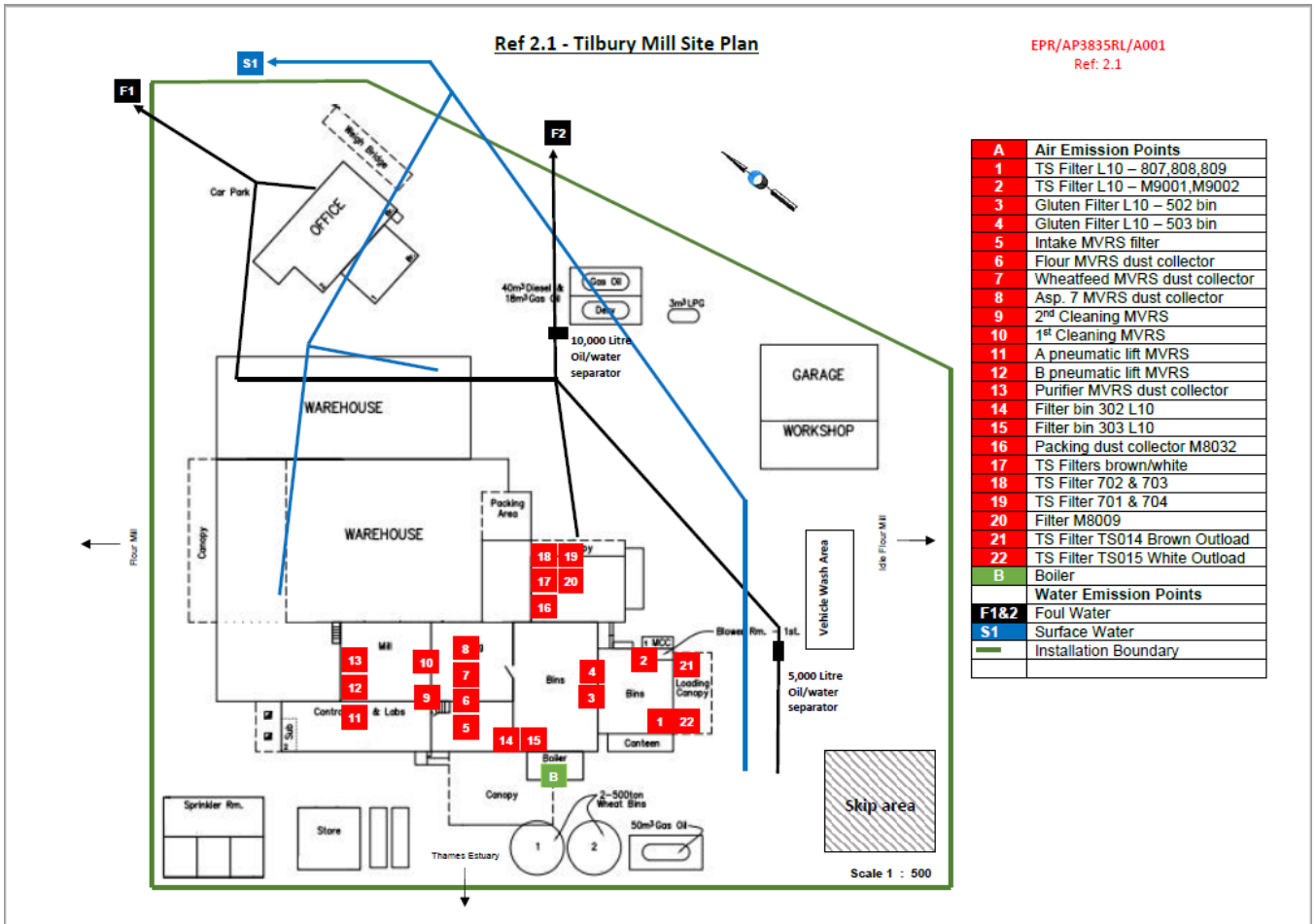
“Pests” means Birds, Vermin and Insects.

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.

“year” means calendar year ending 31 December.



# Schedule 7 – Site plan



END OF PERMIT

# Reporting Forms

## Emissions to Air Reporting Form

Permit number: *EPR/AP3835RL*

Operator: *ADM Milling Limited*

Facility name: *Tilbury Flour Mill*

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

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

| <b>Emission point</b> | <b>Substance / parameter</b>   | <b>Emission Limit Value</b>        | <b>Reference period</b>     | <b>Test method <sup>1</sup></b> | <b>Result <sup>2</sup></b> | <b>Sample dates and times <sup>3</sup></b>     | <b>Uncertainty <sup>4</sup></b>                           |
|-----------------------|--|------------------------------------|-----------------------------|---------------------------------|----------------------------|--|---|
| <i>[e.g. A1]</i>      | <i>[e.g. Oxides of nitrogen (NO and NO<sub>2</sub> expressed as NO<sub>2</sub>)]</i> | <i>[e.g. 200 mg/m<sup>3</sup>]</i> | <i>[e.g. daily average]</i> | <i>[e.g. BS EN 14181]</i>       | <i>[State result]</i>      | <i>[State relevant dates and time periods]</i> | <i>[State uncertainty if not 95% confidence interval]</i> |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |
|                       |  |                                    |                             |                                 |                            |  |   |

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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

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

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

## Water Usage Reporting Form

Permit number: *EPR/AP3835RL*

Operator: *ADM Milling Limited*

Facility name: *Tilbury Flour Mill*

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

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

| Water source  | Water usage (m <sup>3</sup> )   | Specific water usage (m <sup>3</sup> /tonne of product) <sup>2</sup>          |
|---|---|---|
| Mains water   | <i>[insert annual usage in m<sup>3</sup> where mains 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

Signed: *[Name]*

Date: *[DD/MM/YY]*

(Authorised to sign as representative of the operator)

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

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

## Energy Usage Reporting Form

Permit number: *EPR/AP3835RL*

Operator: *ADM Milling Limited*

Facility name: *Tilbury Flour Mill*

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

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

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

### Operator's comments

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/AP3835RL*

Operator: *ADM Milling Limited*

Facility name: *Tilbury Flour 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 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>               |
| <br><br><br><br><br><br><br><br><br><br> |

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.