

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

DACSA Limited
Liverpool Grain Mill
Crosby Road South
Liverpool
L21 4PF

Variation application number

EPR/KP3732SX/V003

Permit number

EPR/KP3732SX

Liverpool Grain Mill

Permit number EPR/KP3732SX

Introductory note

This introductory note does not form a part of the notice

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

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

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

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

The schedules specify the changes made to the permit.

The main features of the permit are as follows:

The installation is located at Seaforth, Liverpool and is approximately centred on National Grid Reference SJ 3285 9640. The installation is part of the Royal Seaforth docks facility, located just North of Liverpool City and is operated by DACSA Limited.

The Installation manufactures maize products (140,000 tonnes per year), which are used as raw materials for the breakfast cereal, brewing and snack industries. By-products of the process screenings and broken maize are sold for use as animal feed (60,000 tonnes per year).

The activity is regulated under Section 6.8 Part A (1) (d) (ii); Treatment and processing, other than exclusively packaging, the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging) – only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day.

The finished product production capacity for this installation is 960 tonnes per day.

Maize processing activities include a number of steps which include cleaning, conditioning, degermination and aspiration of the grain to prepare the grain for processing; size reduction and grading using techniques such as grinding, separation, sifting and sizing; processing activities including mixing, cooking, drying and cooling. Also included within the activity is material handling (raw material intake and storage (maize and additives), transportation of materials and packing and offloading of finished product); cleaning of the stores, mill and silos; and waste handling and storage. Finished materials are stored in large stainless-steel silos which are located inside a clad building which forms part of the mill complex. Loading from silos is completed by bulk HGV loader/trailer which is loaded from a bottom discharge gantry underneath the silos. All loading takes place inside the building.

All steam for the process is currently supplied via the Port of Liverpool Combined Heat and Power (CHP) scheme, following the decommissioning of the two 2.5MWth gas-fired boilers. However, the operator wishes to keep the boilers in the permit in case they are required to generate steam onsite in the future.

The installation gives rise to emissions to air of particulate matter, for which the majority of releases are abated by bag filters fitted with pressure drop monitors, and cyclones. There is also an emission to sewer, which consists of boiler blowdown, surface water run-off and washdown water. Currently there is no emission

of boiler blowdown to sewer, but the operator wishes to retain this in the permit in case there is a need to install a new boiler on site in the future. There are no emissions from the installation to water or land.

The Ensor's Pool Special Area of Conservation (SAC) is located within 10km of the installation. The Boon's Quarry Site of Special Scientific Interest (SSSI), Woodlands Quarry SSSI, Illing's Trenches SSSI, 10 Local Wildlife Sites and three Ancient Woodlands are within 2km of the installation.

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

Status log of the permit		
Description	Date	Comments
Application received EPR/KP3732SX	Duly made 26/10/2005	
Additional information received	01/03/2006	
Additional information received	12/05/2006	Permit issued to DACSA Limited.
Application EPR/KP3732SX/V002 (variation and consolidation)	Duly made 08/10/2021	Application to install two additional storage silos, and associated discharge gantry via an extension to the mill building and add two new emission points.
Additional information received	19/01/2022	Confirmation that the boiler has been decommissioned.
	20/01/2022	Details of the decommissioning of the boiler, filling frequency of the new silos, emission point plan and clarification regarding new emission points A39 and A40.
	21/01/2022	Revised site drainage plan.
	27/01/2022	Revised emission point plan.
Variation determined and consolidation issued EPR/KP3732SX	10/02/2022	Varied and consolidated permit issued in modern format.
Application EPR/KP3732SX/V003 (variation and consolidation)	Regulation 61 Notice response received 18/07/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information received	17/02/2023	RFI response – Revised R61 Tool
Variation determined and consolidation issued EPR/KP3732SX (Billing ref. GP3642QQ).	05/05/2023	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/KP3732SX

Issued to

DACSA Limited (“the operator”)

whose registered office is

Crosby Road South

Liverpool

L21 4PF

company registration number 05534540

to operate a regulated facility at

Liverpool Grain Mill

Crosby Road South

Liverpool

L21 4PF

to the extent set out in the schedules.

The notice shall take effect from 05/05/2023

Name	Date
Katherine Fisher	05/05/2023

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/KP3732SX

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/KP3732SX/V003 authorising,

DACSA Limited (“the operator”),

whose registered office is

Crosby Road South

Liverpool

L21 4PF

company registration number 05534540

to operate an installation at

Liverpool Grain Mill

Crosby Road South

Liverpool

L21 4PF

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

Name	Date
Katherine Fisher	05/05/2023

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:
- (i) the nature of the process producing the waste;
 - (ii) the composition of the waste;
 - (iii) the handling requirements of the waste;
 - (iv) the hazardous property associated with the waste, if applicable; and
 - (v) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

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

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2) the first monitoring measurements shall be carried out within four months of 01/01/2030 or of the date when the MCP is first put into operation, whichever is later.

3.2 Emissions of substances not controlled by emission limits

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

3.3 Odour

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

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 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;
 - (b) process monitoring specified in table S3.3.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

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

4 Information

4.1 Records

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

- (i) off-site environmental effects; and
- (ii) matters which affect the condition of the land and groundwater.

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

4.2 Reporting

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

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

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

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

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

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

4.3 Notifications

4.3.1 In the event:

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

suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.

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

4.4 Interpretation

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

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	S6.8 A1 (d) (ii)	Treatment and processing of only vegetable raw materials, intended for the production of food or feed at a plant with a finished product production capacity greater than 300 tonnes per day.	From receipt of raw materials through to dispatch of final product. Production capacity is limited to 960 tonnes per day.
Directly Associated Activity			
AR2	Steam supply	Operation of two gas-fired boilers each with a net rated thermal input of 2.5MWth.	From receipt of fuel to release of products of combustion to air.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/KP3732SX	Section 2.1 and 2.2 of the application made by DACSA Ltd, which incorporates the response to questions 2.2 given in pages 13 to 19, 26 to 30, 32 to 85, 90 to 98 of the application made by Cargill Plc (excluding references to the workshop and pump house); and all parts of the response to the request for information dated 25/7/05	26/10/2005
	Boiler plant information	01/03/2006
	Additional information on point source emissions. All parts.	12/05/2006
Application EPR/KP3732SX/V002	<ul style="list-style-type: none"> Environmental risk assessment provided in response to Section 6 of Part C2 of the application. Details of new emissions to air in response to Section 2 of Part C3 of the application. Operating techniques document, dated 10/08/21, in response to Section 3 of Part C3 of the application. Revised Noise Impact Assessment, dated 07/06/21, in response to Section 3b of Part C3 of the application. Site plans showing the extension to the mill building and location of new emission point, in response to Section 5 of Part C2 of the application. 	Duly made 08/10/2021
Additional Information	Response to request for information providing details of the decommissioning of the boiler, confirmation of the filling frequency of the new silos and clarification regarding the new emission points, A39 and A40.	20/01/2022
	Response to request for information providing a revised site drainage plan.	21/01/2022
Additional information	Response to request for information providing a revised emission point plan.	27/01/2022

Table S1.2 Operating techniques		
Description	Parts	Date Received
Regulation 61 (1) Notice – Responses to questions dated 16/02/2022	All parts	Received 18/07/2022
Regulation 61(1) Notice – request for further information dated 31/01/2023	Update R61 response tool	Received 17/02/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC9	<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 be limited to the following:</p> <ol style="list-style-type: none"> 1. Methodology for how representative monitoring will be carried out annually, with a minimum of 3 point sources on a rolling-basis. 2. Ensuring the key process stages, grain cleaning, grain milling and finished product handling including wheatfeed, are prioritised. 3. Identify any principal emission points excluded from the rolling monitoring programme and provide a justification for this. 4. Provide a commencement date for the programme which will demonstrate compliance with the permit requirements. <p>The monitoring procedure shall address the requirements of BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 5.</p>	04/07/2023
IC10	<p>The operator shall submit a climate change adaptation plan to the Environment Agency for approval.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> • Details of how the installation has or could be affected by severe weather; • The scale of the impact of severe weather on the operations of the within the installation; • An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation. <p>The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	DD/MM/YYYY (12 months from permit date issue) unless otherwise agreed in writing with the environment agency

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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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 on site plan – emission points in Schedule 7	Boiler 1 (2.5MWth natural gas fired boiler)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	250 mg/m ³ [NOTE 4]	Periodic	Every three years	BS EN 14792
		Carbon Monoxide	No limit set [NOTE 4]	Periodic	Every three years	BS EN 15058
A1 on site plan – emission points in Schedule 7	Boiler 2 (2.5MWth natural gas fired boiler)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	250 mg/m ³ [NOTE 4]	Periodic	Every three years	BS EN 14792
		Carbon Monoxide	No limit set [NOTE 4]	Periodic	Every three years	BS EN 15058
A2 on site plan - emission points in Schedule 7	Cyclone serving Silo aeration fan exhaust vent	Particulate matter	No set limit	-	-	-
A3 - A5 on site plan – emission points in Schedule 7	Bag filter abatement serving F27, F15, F23 Silo exhaust vents	Particulate matter	No set limit	-	-	-
A6 on site plan – emission points in Schedule 7	Bag filter abatement serving F10 mill exhaust vent	Particulate matter	5mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A7 on site plan – emission points in Schedule 7	Bag filter abatement serving Warehouse packer exhaust vent	Particulate matter	No set limit	-	-	-
A8 on site plan – emission points in Schedule 7	Bag filter abatement serving East Masa Bin filter exhaust vent [NOTE 5]	Particulate matter	No limit set	-	-	-

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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A9 on site plan – emission points in Schedule 7	Bag filter abatement serving West Masa Bin filter exhaust vent [NOTE 5]	Particulate matter	No limit set	-	-	-
A10 on site plan – emission points in Schedule 7	Bag filter abatement serving Bins 7-10 exhaust vents	Particulate matter	No limit set	-	-	-
A11 on site plan – emission points in Schedule 7	Bag filter abatement serving bulk outloading bins pulsair exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A12 on site plan – emission points in Schedule 7	Bag filter abatement serving Mill meal cooler exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A13 on site plan – emission points in Schedule 7	Bag filter abatement serving F22 maize cleaning exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A14 on site plan – emission points in Schedule 7	Bag filter abatement serving F21 maize cleaning exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A15 on site plan – emission points in Schedule 7	Bag filter abatement serving F17 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A16 on site plan – emission points in Schedule 7	Bag filter abatement serving F2A mill exhaust vent	Particulate matter	5 mg/m ³ [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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A17 on site plan – emission points in Schedule 7	Bag filter abatement serving F18 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A18 on site plan – emission points in Schedule 7	Bag filter abatement serving F19 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A19 on site plan – emission points in Schedule 7	Bag filter abatement serving F20 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A20 on site plan – emission points in Schedule 7	Bag filter abatement serving F2 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A21 on site plan – emission points in Schedule 7	Bag filter abatement serving F1 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A22 on site plan – emission points in Schedule 7	Bag filter abatement serving penthouse exhaust vent	Particulate matter	No set limit	-	-	-
A23 on site plan – emission points in Schedule 7	Bag filter abatement serving F16 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A24 on site plan – emission points in Schedule 7	Bag filter abatement serving F26 maize cleaning exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A25 on site plan – emission points in Schedule 7	Bag filter abatement serving F11 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A26 on site plan – emission points in Schedule 7	Bag filter abatement serving F12	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling	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

Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
	mill exhaust vent			period [NOTE 2]		
A27 on site plan – emission points in Schedule 7	Bag filter abatement serving F13 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A28 on site plan – emission points in Schedule 7	Bag filter abatement serving F14 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A29 on site plan – emission points in Schedule 7	Bag filter abatement serving F9 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A30 on site plan – emission points in Schedule 7	Bag filter abatement serving F8 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A31 on site plan – emission points in Schedule 7	Bag filter abatement serving F7 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A32 on site plan – emission points in Schedule 7	Bag filter abatement serving F6 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A33 on site plan – emission points in Schedule 7	Bag filter abatement serving F5 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A34 on site plan – emission points in Schedule 7	Bag filter abatement serving F4 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A35 on site plan – emission points in Schedule 7	Bag filter abatement serving F24 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A36 on site plan – emission points in Schedule 7	Cyclone serving No. 1 dryer exhaust vent	Particulate matter	5mg/m ³	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						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A37 on site plan – emission points in Schedule 7	Cyclone serving No. 2 dryer exhaust vent	Particulate matter	5mg/m ³	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A38 on site plan – emission points in Schedule 7	Bag filter abatement serving F3 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A39 on site plan – emission points in Schedule 7	Bag filter abatement serving F30 mill exhaust vent	Particulate matter	5 mg/m ³ [NOTE 1]	Average over sampling period [NOTE 2]	In line with the rolling monitoring procedure [NOTE 3]	BS EN 13284-1
A40 on site plan – emission points in Schedule 7	Bag filter abatement serving F30 bin exhaust vent	Particulate matter	No set limit	-	-	-
A41 on site plan – emission points in Schedule 7	Bag filter abatement serving F30 Filter explosion vent	Particulate matter	No set limit	-	-	-

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 IC9.
NOTE 4 – The emission limit and/or monitoring requirements apply from 1 January 2030, unless otherwise advised by the Environment Agency or the boiler is replaced.
NOTE 5 – The operator shall give at least 14 days pre-notification before the use of these emission points.

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 on Drainage plan in Schedule 7 emission to United Utilities Regent Road Sewage Treatment Works	Uncontaminated surface run-off, washdown water and boiler blowdown.	No parameters set	No limit set	-	-	-

Table S3.3 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Performance of the fabric filters associated with emission points A3, A4, A5, A7, A10 to A21 inclusive, A23 to A35 inclusive, and A38 and A39 on site plan – emission points in Schedule 7	Differential pressure	Weekly	Visual and manual check	Recorded inspection. Corrective actions shall be implemented as soon as reasonably practicable if any failures are identified.

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	A6, A11, A12, A13, A14, A15, A16, A17, A18, A19, A20, A21, A23, A24, A25, A26, A27, A28, A29, A30, A31, A32, A33, A34, A35, A36, A37, A38, and A39.	Every 12 months (in accordance with the rolling monitoring procedure, as agreed in IC9)	1 January
	A1	First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter.	From first monitoring requirements in accordance with Condition 3.1.4

Table S4.2: Annual production/treatment	
Parameter	Units
Products produced	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste – recovery/disposal routes	Annually	tonnes

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

Schedule 5 – Notification

These pages outline the information that the operator must provide.

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

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

Part A

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

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

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

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

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

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

Part B – to be submitted as soon as practicable

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

Name*	
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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.

“background concentration” means such concentration of that substance as is present in:

- for emissions to surface water, the surface water quality up-gradient of the site; or
- for emissions to sewer, the surface water quality up-gradient of the sewage treatment works discharge.

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

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

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

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

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

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

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

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

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

“Pests” means Birds, Vermin and Insects.

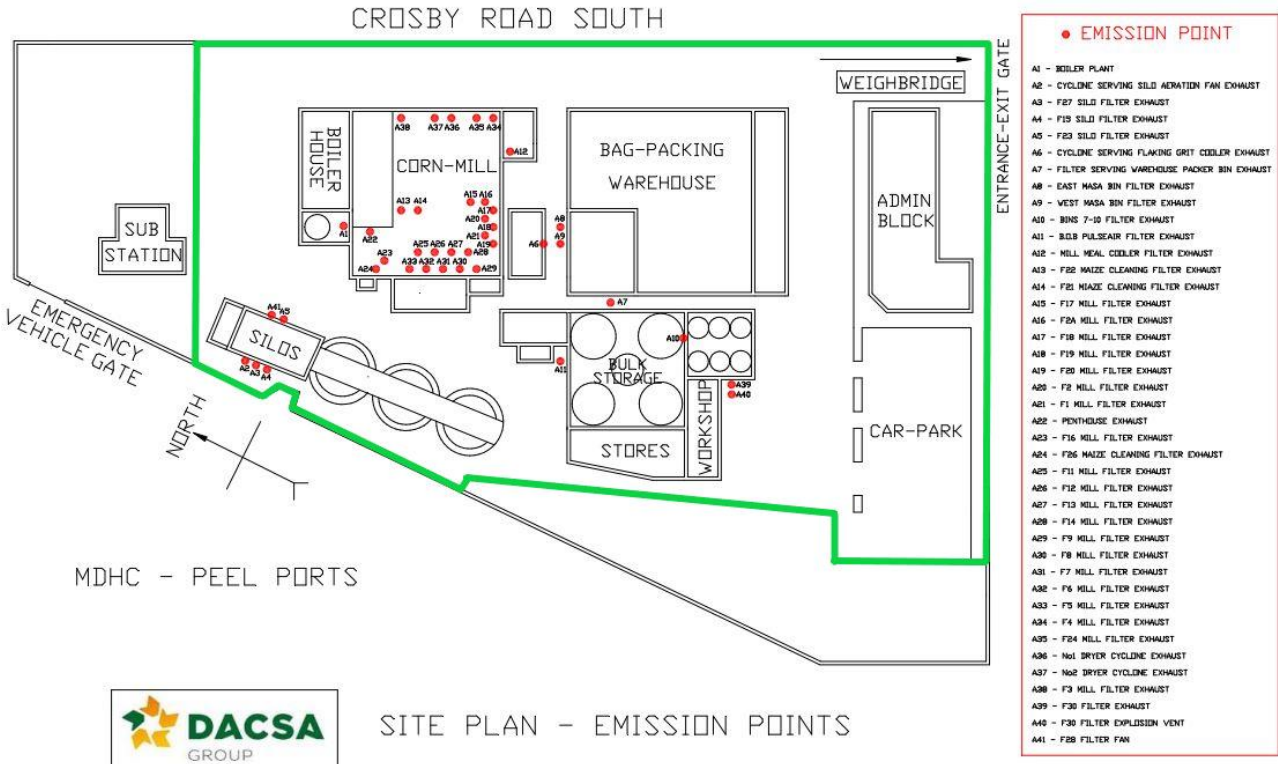
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels ; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content

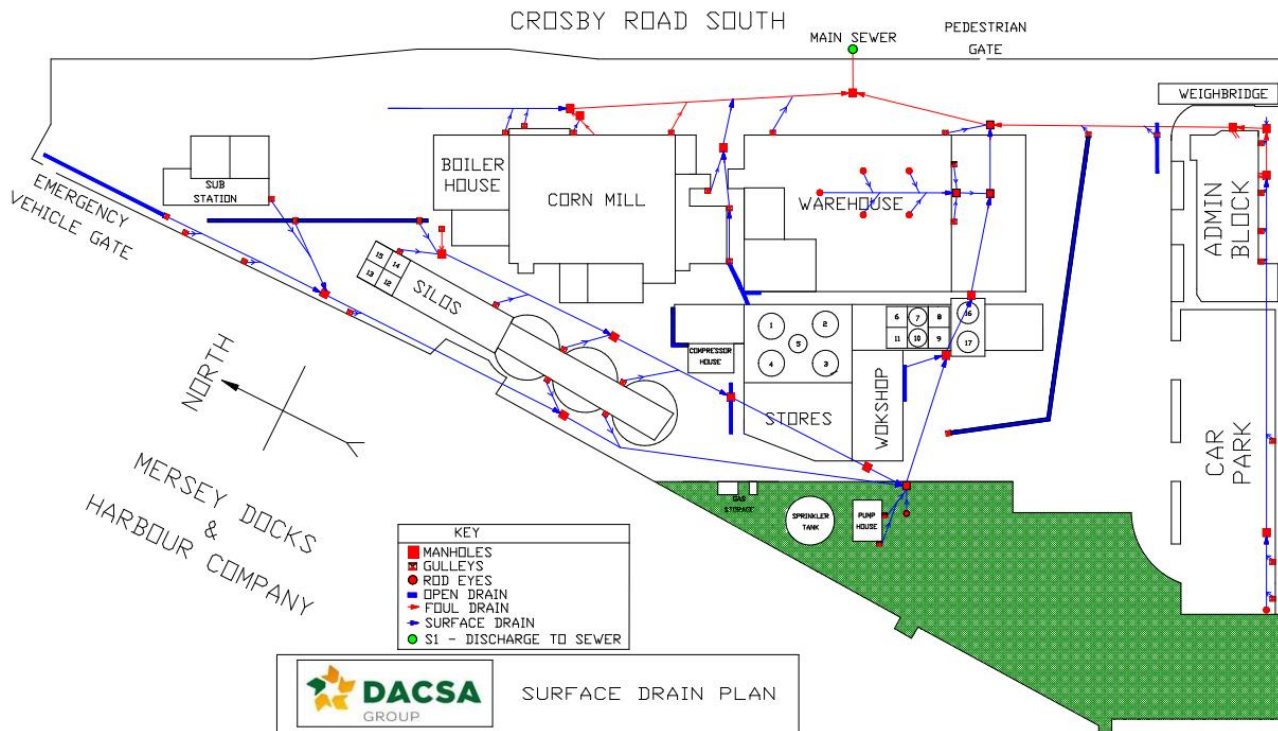
“year” means calendar year ending 31 December.

Schedule 7 – Site plan



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Drainage plan



END OF PERMIT