

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Heygates Limited

Tring Flour Mill

New Mill

Garnel Wharf

Garnel

Tring

Hertfordshire

HP23 4JN

Variation application number

EPR/TP3339DX/V002

Permit number

EPR/TP3339DX

Tring Flour Mill

Permit number EPR/TP3339DX

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.

The schedules specify the changes made to the permit.

Tring Flour Mill is a flour manufacturing facility located in Tring, Hertfordshire (centred at NGR SP 92446 13021) which produces a range of flour products that are suitable for consumption without further processing, operated by Heygates Limited. The site has been in operation since 1945 and was previously regulated under the LAPPC regime but required an environmental permit following the 2013 update to the Environmental Permitting Regulations, which implemented the Industrial Emissions Directive, and redefined permit thresholds for the food and drink sector based on the maximum production capacity of the installation:

Section 6.8 Part A(1)(d)(ii) - Treatment and processing of vegetable raw materials with a finished product production capacity greater than 300 tonnes per day or 600 tonnes per day where the installation operates for a period of no more than 90 consecutive days in any year.

The installation primarily mills British wheat but can also receive European and North American wheat in order to manufacture a range of flour products to meet customer demands (over 80 grades of flour can be produced). The main product is bakers' flour, but other products include wholemeal and bran for breakfast cereals. Wheatfeed by-product is forwarded into the animal feed sector. Flours are often fortified with calcium, iron, thiamine and niacin (except wholemeal) as required by regulation. Products are exported in bags and in bulk.

The process is a grind and sift process. As such the installation houses two Mills (A & B), each with a series of roller mills, sifters, purifiers, etc. that repeatedly operate in sequence to prepare the final product. Mill A can manufacture a range of products whereas Mill B is normally dedicated to white flour production. The stages are receipt and storage of raw materials, conditioning, cleaning, breaking, sifting & scalping, purifying, grinding, dressing and bran finishing. Once processed the products are stored and bagged prior to despatch.

The main emissions to air arise from 21 point source emissions at various stages of the process, each is abated with filter sleeves (reverse jet filters). The filter sleeves of the large capacity filters are made of cloth whilst with the small capacity filters are made of paper (cartridge type). The efficiency of the larger filters is shown by a pressure differential meter on each filter.

Surface water run-off (site drainage) and laboratory sinks are discharged to the Thames Water combined sewer for treatment at Crossness Sewage Treatment Works. There are no direct discharges to water from this site.

There are two Sites of Special Scientific Interest (SSSI) within 2km of the installation; Tring Reservoirs SSSI (approx. 240m) and Pitstone Quarry SSSI (approx. 1.5km) and one SAC/SPA/Ramsar within 10km; Chilterns Beechwoods Special Area of Conservation (approx. 2.5km).

The installation sits within a predominately residential area and is sited on the banks of the Grand Union Canal (Wendover Arm).

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 EPR/TP3339DX/A001	Duly made 05/05/2016	Application for a bespoke permit.
Additional information received	12/09/2016	Partial response to Schedule 5 notice dated 30/08/2016
Additional information received	07/03/2017	Partial response to Schedule 5 notice dated 30/08/2016
Additional information received	17/07/2017	Partial response to Schedule 5 notice dated 30/08/2016
Additional information received	08/08/2017	Revised Accident Management Plan
Additional information received	08/09/2017	Revised Accident Management Plan V2
Permit determined EPR/TP3339DX	06/10/2017	Permit issued to Heygates Limited
Application EA/EPR/TP3339DX/V002 (variation and consolidation)	Regulation 61 Notice response received 01/06/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Request for further information dated 08/03/2023	31/03/2023	Further information provided regarding the completion of the Relative Hazardous Substances Assessment, Containment and information relating to the air emission points.
Variation determined and consolidation issued EPR/TP3339DX Billing Ref: FP3247JW	31/05/2023	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/TP3339DX

Issued to

Heygates Limited (“the operator”)

whose registered office is

Bugbrooke Mills

Bugbrooke

Northampton

NN7 3QH

company registration number 00603238

to operate a regulated facility at

Tring Flour Mill

New Mill

Gammel Wharf

Gammel

Tring

Hertfordshire

HP23 4JN

to the extent set out in the schedules.

The notice shall take effect from 31/05/2023

Name	Date
Vicky Patchett	31/05/2023

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/TP3339DX

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/TP3339DX/V002 authorising,

Heygates Limited (“the operator”),

whose registered office is

Bugbrooke Mills

Bugbrooke

Northampton

NN7 3QH

company registration number **00603238**

to operate an installation at

Tring Flour Mill

New Mill

Gannel Wharf

Gannel

Tring

Hertfordshire

HP23 4JN

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

Name	Date
Vicky Patchett	31/05/2023

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) take appropriate measures to ensure that energy is recovered with a high level of energy efficiency and energy is used efficiently in the activities.
- (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 and S3.2.

3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.

3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1 and S3.2 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.

3.6.2 The operator shall:

(a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;

(b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

(a) be legible;

(b) be made as soon as reasonably practicable;

(c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and

(d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:

(i) off-site environmental effects; and

(ii) matters which affect the condition of the land and groundwater.

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

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 For the following activities referenced in schedule 1, table S1.1 (AR1 to AR4 etc.) A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.
- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

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

4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

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

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

- (a) any change in the operator's name or address; and
- (b) any steps taken with a view to the dissolution of the operator.

In any other case:

- (a) the death of any of the named operators (where the operator consists of more than one named individual);
- (b) any change in the operator's name(s) or address(es); and
- (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:

- (a) the Environment Agency shall be notified at least 14 days before making the change; and
- (b) the notification shall contain a description of the proposed change in operation.

4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.

4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:

- (a) a decision by the Secretary of State not to re-certify the agreement;
- (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
- (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.

4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 Part A(1) (d) (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 560 tonnes per day
Directly Associated Activity			
AR2	Raw material handling and storage	The receipt, handling and storage of raw materials to be used in the process	From receipt of raw material to use in the production of finished products
AR3	Finished product storage and dispatch	The storage and dispatch of finished products	From production of finished product to dispatch off site.
AR4	Compressed air	The production of compressed air using screw compressors	From production to use on the process

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	Answers to Section 3 on EP application form Part B3 including references to the Food and Drink Sector Guidance EPR 6.10 and the Food, Drink and Milk Industries BREF. The following sections of the application supporting information: I Management III Process Description IV Emissions V Raw Materials VI Monitoring VII Energy VIII Waste Management IX Environmental Risk Assessment X Closure Appendix C Nuisance Management Plan	Duly Made 05/05/2016
Responses to Schedule 5 Notice dated 30/08/2016	All	12/09/2016 07/03/2017 17/07/2017
Additional information	Revised Accident Management Plan V2 New Mill Spillage Control Procedure	08/09/2017
Regulation 61 (1) Notice – Responses to questions	All parts and supporting information.	01/06/2022
Regulation 61 Notice - request for further information dated 08/03/2023	RFI response – revised R61 Tool RFI response for missing information relating to relevant hazardous substances, containment, and air emission points.	31/03/2023

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC3	The operator shall provide a report detailing a comprehensive review of all storage tanks and silos on site by a suitably qualified engineer. The report shall include confirmation of age, condition, anticipated future operational life, filling and emptying arrangements, any overfill protection such as level control and alarms, together with details of containment measures. The report shall determine if the tanks and containment measures are fit for purpose, having regard for the relevant guidance, or where this is not the case, provide a schedule of works for proposed improvements with timescales for completion.	04/12/2023
IC4	The operator shall provide a report detailing a comprehensive review of the structural integrity of all bunds on site, to determine if they are fit for purpose and appropriately sized; having regard for the relevant guidance. The review shall be undertaken by a suitably qualified engineer and include integrity testing, where appropriate. Where improvements to bunding and containment are identified, the operator shall provide a schedule of works with timescales for completion.	04/12/2023
IC6	<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, wheat cleaning, wheat 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>	04/12/2023

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	Wheat silo	Particulate matter	No limit set	--	--	--
A2	Offal bin 1 DC	Particulate matter	No limit set	--	--	--
A3	Top Packer DC	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A4	Bran Packet	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A5	PN A	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A6	PN B	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A7	General Exhaust	Particulate matter	No limit set	--	--	--
A8	Pre Pack Line 1	Particulate matter	No limit set	--	--	--
A9	Pre Pack Line 3	Particulate matter	No limit set	--	--	--
A10	Flour Bin 14	Particulate matter	No limit set	--	--	--
A11	Purifier DC	Particulate matter	No limit set	--	--	--
A12	Flour Bins 23 - 27	Particulate matter	No limit set	--	--	--
A13	Flour Bins 28 - 32	Particulate matter	No limit set	--	--	--
A14	Main Packer WML	Particulate matter	5 mg/m ³ [Note 1]	Average over sample 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
A15	Main Packer White	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A16	Flour Bins 37 - 39	Particulate matter	No limit set	--	--	--
A17	Wheatfield Mill B	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A18	Bill B PN	Particulate matter	5 mg/m ³ [Note 1]	Average over sample period [Note 2]	In line with the rolling monitoring procedure [Note 3]	BS EN 13284-1
A19	Mill B General Ventilation	Particulate matter	No limit set	--	--	--
A20	Screens Room A	Particulate matter	No limit set	--	--	--
A21	Screens Room B	Particulate matter	No limit set	--	--	--
NOTE 1 – The emission limit applies from 4 December 2023.						
NOTE 2 – Average value of three consecutive measurements of at least 30 minutes each.						
NOTE 3 – The monitoring frequency shall be in line with the rolling monitoring procedure, as agreed in IC6.						

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 site plan in schedule 7 emission to Thames Water Crossness Sewage Treatment Works via combined sewer	Surface water from north yard	No parameters set	No limit set	-	-	-
S2 on site plan in schedule 7 emission to Thames Water Crossness Sewage Treatment Works	Site drainage from south yard	No parameters set	No limit set	-	-	-

**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
via com						
S3 on site plan in schedule 7 emission to Thames Water Crossness Sewage Treatment Works via combined sewer	Laboratory sinks	No parameters set	No limit set	-	-	-

Schedule 4 – Reporting

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

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	A3, A4, A5, A6, A14, A15, A17, A18	Every 12 months (in accordance with the rolling monitoring procedure, as agreed in IC6)	1 January

Table S4.2: Annual production/treatment	
Parameter	Units
Flour products	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	tonnes
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	Form water usage 1 or other form as agreed in writing by the Environment Agency	Version 1 08/03/2021
Energy usage	Form energy 1 or other form as agreed in writing by the Environment Agency	Version 1 08/03/2021
Other performance indicators	Form performance 1 or other form as agreed in writing by the Environment Agency	Version 1 08/03/2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

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

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

Part A

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

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

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

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

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

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

Part B – to be submitted as soon as practicable

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

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

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

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

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

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

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

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

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

Pests” means Birds, Vermin and Insects.

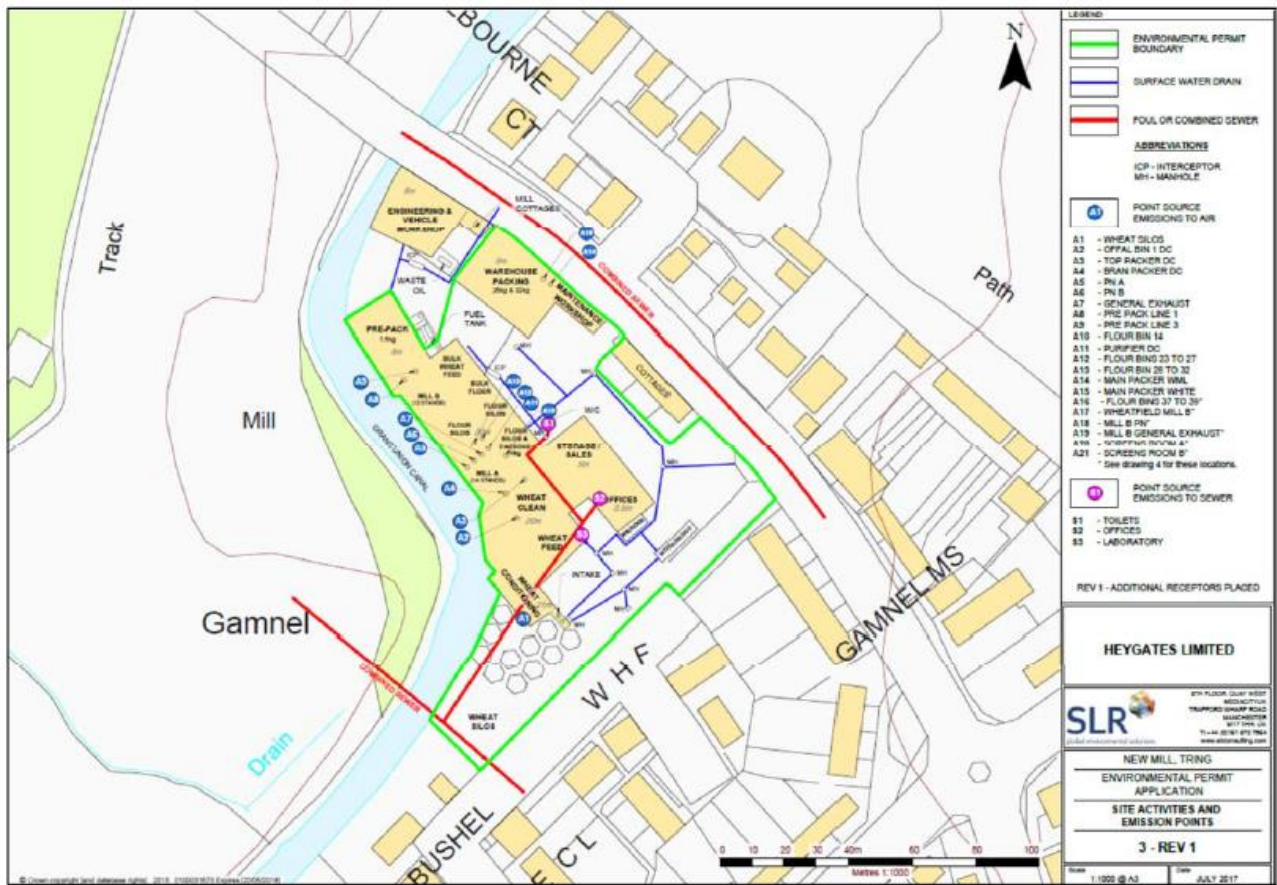
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

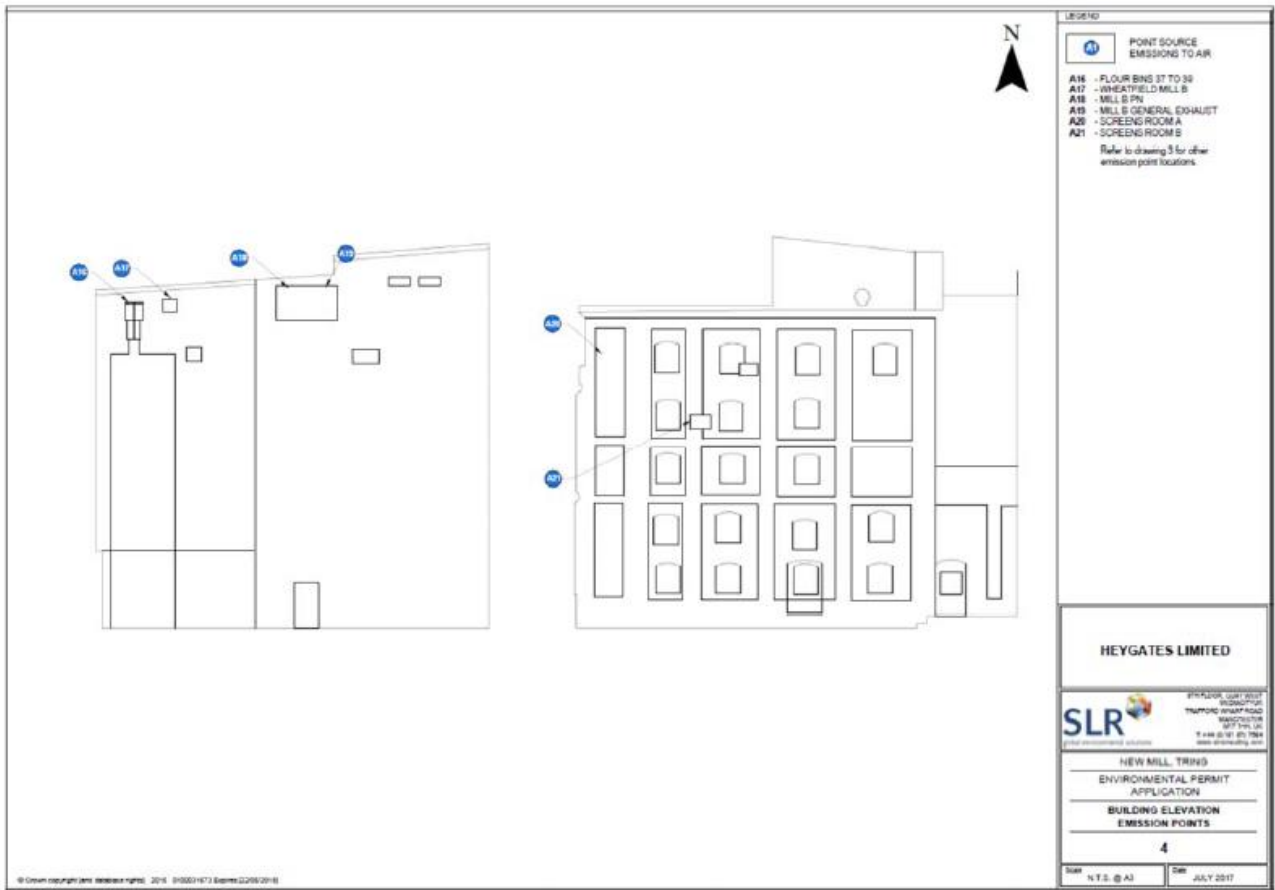
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

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





END OF PERMIT