

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Gilbertson & Page Limited

Brownfields Pet Food Factory
44-55 Brownfields
Welwyn Garden City
Hertfordshire
AL7 1AN

Variation application number

EPR/YP3135YD/V002

Permit number

EPR/YP3135YD

Brownfields Pet Food Factory

Permit number EPR/YP3135YD

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 in an industrial and commercial area of Welwyn Garden City at national grid reference TL 24862 13117 and manufactures pet food based upon core formulations of wheat, rice, maize and meat meal. Other specific additives include vitamins and mineral supplements. The key stages of the processing are batching, mixing, grinding, conditioning (steam treatment), extrusion (cooking), drying, cooling and coating.

The required feed materials, additives and minerals are batched to the required individual recipe and mixed. The mixture is then transferred to a grinder for reduction to a uniform size. Following grinding, the mix is transferred by conveyor to the extrusion area where it is first conditioned by adding moisture. The steam used for this process is provided by a natural gas fired boiler with a capacity of 2.5 MWth whose flue gases are released into the atmosphere via air emission point A1.

After conditioning, the mix is extruded through die plates to produce pellets of the required shape. The pellets are dried in four natural gas-fired ovens (each of a thermal input of 1.5 MW) and cooled on a conveyor using ambient air. Following cooling, the pellets are coated in chicken fat and digest and blown across the factory via pipework to the bagging area. The finished product is then bagged via weigh pans, heat-sealed and moved to the storage area prior to despatch off-site to customers.

The emissions from the mixing, drying and extrusion process are released to air through emission point A2, odour and particulate matter from the mixing, drying and extrusion process are abated via carbon filter, cyclone, and bag filter. The emissions from the batching process are released to air via emission point A3 which is abated via a bag filter. Emissions from the grinding process are emitted through emission point A4 and are abated via a carbon filter and bag filter, and dry storage vacuum emissions are released through emission point A5 and are abated via a cyclone.

Uncontaminated surface water from roofs and site surface water is discharged to a surface water drain via interceptor through emission points SW1 and SW2, while process effluent is discharged via emission point S1 after reverse osmosis (RO) treatment to the Thames Water Plc foul sewer for further treatment.

All plant and process areas are on hardstanding. All tanks containing liquids, whose emissions to water or land could cause pollution are contained in adequate bunding and sized to contain 110% of the contents of the largest tank or 25% of the total tankage within a bund, whichever is the greater. Materials used for surfacing of process areas and bunds are resistant to the materials they may come into contact with.

Wormley-Hoddesdon Park Woods Special Area of Conservation (SAC) is located 9.3 km from the Installation. There are two Sites of Special Scientific Interest (SSSI) and twenty non-statutory sites (local wildlife sites and ancient woodland) located within 2 km of the Installation. Assessment by the Environment Agency shows that emissions from activities undertaken at the Installation are unlikely to have a significant impact on the habitat sites.

There is a Climate Change Levy Agreement (CCLA) in place for this Installation. The EMS in place at this site is not accredited to ISO 14001 standard.

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/YP3135YD/A001	Duly made 28/09/2017	Application received for the production of dry pet food
Additional information received	10/11/2017	Part response to Schedule 5 notice dated 20/10/17.
Additional information received	27/11/2017	Response to queries regarding emissions to sewer, secondary containment, point source emissions to air and silos.
Additional information received	10/01/2018	Response to queries regarding site drainage system, dryers (ovens), annual operating hours and particulate monitoring systems.
Additional information received	31/01/2018	Final response to Schedule 5 notice dated 20/10/17 – site EMS and revised site plan.
Permit determined	12/02/2018	Permit issued to Gilbertson & Page Limited.
Application EPR/YP3135YD/V002 (variation and consolidation)	Regulation 61 Notice response received 25/05/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information received (requested 02/05/2023)	21/06/2023	Dust emission points A2, A3, A4, and A5 associated processes and current monitoring values, updated site plan.
Additional information received (requested 27/06/2023)	17/07/2023	Updated site plan that includes sewer discharge points.
Variation determined and consolidation issued EPR/YP3135YD (Billing ref. EP3744QL).	31/07/2023	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/YP3135YD

Issued to

Gilbertson & Page Limited (“the operator”)

whose registered office is

**45-55 Brownfields
Welwyn Garden City
Hertfordshire
AL7 1AN**

company registration number 00055762

to operate a regulated facility at

**Brownfields Pet Food Factory
45-55 Brownfields
Welwyn Garden City
Hertfordshire
AL7 1AN**

to the extent set out in the schedules.

The notice shall take effect from 31/07/2023.

Name	Date
Marcus Woodward	31/07/2023

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/YP3135YD

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/YP3135YD/V002 authorising,

Gilbertson & Page Limited (“the operator”),

whose registered office is

**45-55 Brownfields
Welwyn Garden City
Hertfordshire
AL7 1AN**

company registration number 00055762

to operate an installation at

**Brownfields Pet Food Factory
45-55 Brownfields
Welwyn Garden City
Hertfordshire
AL7 1AN**

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

Name	Date
Marcus Woodward	31/07/2023

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 For the following activities referenced in schedule 1, table S1.1 (AR1) 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.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2 Boiler 1) 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, S3.2 and S3.3;
 - (b) process monitoring 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.
- 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 d (iii)(aa)	<p>Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed</p> <p>Animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than—</p> <p>(aa)75 if A is equal to 10 or more,</p> <p>where 'A' is the portion of animal material in percent of weight of the finished product production capacity.</p>	<p>From receipt of raw materials through to dispatch of final product, bagged dry dog biscuits.</p> <p>Production capacity is limited to 110 tonnes per day.</p>
Directly Associated Activity			
AR2	Steam supply	Medium Combustion plants: Boiler 1: 2.5 MWth Natural gas fired	From receipt of fuel to release of products of combustion to air.
AR3	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.
AR4	Storage and use of chemicals and oils	Storage and use of chemicals and oils at the installation.	From receipt of chemicals and oils to disposal of wastes arising.
AR5	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR6	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water drain system.
AR7	Process water discharge	Collection of contaminated site process waters	Handling, storage and treatment of site process water and boiler water treated through RO plant until discharged to the Thames Water foul sewer.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR8	Operation of air abatement system	Collection and treatment of air from the buildings prior to release to atmosphere	From the collection of air from site processes to treatment via carbon filters (air emission points A2 and A4) and release of treated air to atmosphere.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/YP3135YD/A001	Application Supporting Report document in response to section 3a – technical standards, Part B of the application form	05/17/2017
Additional information	Information relating to size and emissions profile of boiler.	28/09/2017
Response to Schedule 5 Notice dated 20/10/17	Response to questions detailing operating techniques, emissions to sewer, site surfaces and maintenance, secondary containment, management of fugitive emissions and odour management.	10/11/2017
Additional information	Response to questions detailing emissions to sewer, secondary containment, point source emissions to air and silos.	27/11/2017
Additional information	Response to questions regarding site drainage system, dryers (ovens), annual operating hours and particulate monitoring systems.	10/01/2018
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	16/05/2022
Request for further information dates 12/05/2023	Air emission points and processes serviced, air abatement techniques, and product types.	21/06/2023
Additional information	Updated site plan that includes sewer discharge points.	17/07/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC10	<p>The operator shall submit, for approval by Environment Agency, a report setting out progress to achieving the 'Narrative' BAT where BATc is currently not achieved, but will be achieved before 4 December 2023. The report shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1) Methodology for achieving BAT 2) Associated targets /timelines for reaching compliance by 4 December 2023 3) Any alterations to the initial plan (in progress reports). <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 1, 2 and 6. Refer to BAT Conclusions for a full description of the BAT requirement.</p>	04/12/2023

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
IC11	<p>The Operator shall submit a written report to the Environment Agency of monitoring carried out to determine the size distribution of particulate matter in the exhaust gas emissions to air from emission point [A2, A3, A4, and A5], identifying the fractions within the PM10 and PM2.5 ranges. The monitoring shall be carried out under representative operating conditions and shall be in accordance with EN ISO 23210 unless otherwise agreed with the Environment Agency.</p>	12 months from permit issue
IC12	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a revised odour management plan for the activities undertaken at the Installation. The plan shall take into account the appropriate measures for odour control specified in the Part B Process Guidance Note 6/26/13 dated December 2013. The plan shall also include all the required information as specified in the Environment Agency Horizontal Guidance H4 - Odour Management. The plan shall:</p> <ul style="list-style-type: none"> • Include the management of odorous emissions from the start of the process (batching) to the packaging of the finished product, following the completion of emissions monitoring undertaken in POC1, and the identification of required process changes including emissions abatement system (POC3). • address all points raised in the Environment Agency's review of the odour management plan • identify all odorous emissions and activities, under normal and abnormal operations • detail control measures in place for each emission /activity (under normal and abnormal operations) • identify process monitoring required for each emission and trigger levels for action to be taken. <p>The updated odour management plan shall be submitted to the Environment Agency for review and comment. The operator shall amend the odour management plan in accordance with the Environment Agency's comments prior to final approval.</p>	12 months from permit issue or other date agreed in writing with the Environment Agency
IC13	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a written /documented preventative-based overarching maintenance management system for plant, including conditional maintenance (if applicable) of equipment and site infrastructure whose failure could impact on the environment.</p> <p>The overarching maintenance management system report shall identify:</p> <ul style="list-style-type: none"> • roles and responsibilities • a system to generate documented maintenance instructions for each job/task • a review system to <ul style="list-style-type: none"> o track the progress of maintenance jobs o review maintenance tasks frequencies following on-site accidents, incidents, near misses, and notifications from plant /equipment suppliers • a documented system which identifies critical plant/equipment/items, whose failure could impact on the environment, including details of where critical spares can be found on site, and, or sourced within a short timeframe. <p>A report detailing the overarching maintenance management system shall be submitted to the Environment Agency for review and comment. The operator shall amend the maintenance management system in accordance with the Environment Agency's comments prior to final approval.</p>	12 months from permit issue or other date agreed in writing with the Environment Agency
IC14	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a training management system, which identifies the</p>	12 months from permit issue or

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
	<p>training needs, for all staff and personnel, including third party contractors, working at the Installation, relevant to their job role. The training management system report shall identify training requirements for each person/job function, including:</p> <ul style="list-style-type: none"> • Refresher training • access to written/documented operational instructions relevant to their roles within the permitted installation activities • a documented system to maintain a record of the skills and training requirements for all staff whose activities/jobs in relation to the permitted Installation may have an impact on the environment and shall keep records of all relevant training <p>Details of the overarching training management system report shall be submitted to the Environment Agency for review and comment. The operator shall amend the training management system in accordance with the Environment Agency's comments prior to final approval.</p>	<p>other date agreed in writing with the Environment Agency</p>
IC15	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop an accident management plan which identifies accidents /incidents which could have an impact on the environment. The accident management plan shall describe how scenarios including but not limited to events such as fire, explosions, spills/leak are identified and managed to minimise the environmental impact. The plan shall also detail the measures in place to minimise the scenario from occurring. A report on the accident management plan, covering the points above shall be submitted to the Environment Agency for review and comment. The operator shall amend the accident management plan in accordance with the Environment Agency's comments prior to final approval.</p>	<p>12 months from permit issue or other date agreed in writing with the Environment Agency</p>
IC16	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall develop a document management system and documented written procedures for all the permitted installation activities which covers:</p> <ul style="list-style-type: none"> • normal operational conditions • abnormal operating conditions • investigating and reporting actual or potential non-compliance with operating procedures whose failure could lead to an impact on the environment • investigating abnormal operating conditions, including any malfunction, breakdown of plant, equipment or technique, down time, and short term or long term remedial measures and near misses, and prompt implementation of required actions, and the maintenance of detailed records of all actions and investigations, and • a documented system to record and investigate environmental complaints relating to the permitted installation activities, or alleged environmental effects on the environment, detailing the date, nature and source of the complaint, a summary of the review and investigation and actions taken, including any review and changes of the site management systems. <p>The operator shall submit a report on the management system developed to manage the above document procedures, including when procedures will be reviewed and updated. The report shall be submitted to the Environment Agency for review and comment. The operator shall amend the document management system in accordance with the Environment Agency's comments prior to final approval.</p>	<p>12 months from permit issue or other date agreed in writing with the Environment Agency</p>
IC17	<p>Prior to the commencement of activities specified in Table S1.1, the operator shall undertake a survey to determine the integrity, adequacy and suitability of existing site hardstanding, kerbing and secondary containment for above-ground tanks and the measures to comply with the requirements</p>	<p>12 months from permit issue or other date agreed in writing</p>

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
	of the Food and Drink Technical Guidance Note (EPR 6.10), CIRIA 736 and any other relevant industry standard. The survey shall assess the adequacy of the design, construction and condition of existing site hardstanding, kerbing and secondary containment for above-ground tanks with the purpose of preventing fugitive emissions to surface water, ground water and land. A written report summarising the survey, proposals for improvements and a timescale for implementation of any improvements shall be submitted to the Environment Agency for review and comment. The operator shall implement any improvements in accordance with the Environment Agency's comments.	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 [Point A1 on site plan in Schedule 7]	Boiler Plant 2.5 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 15267-3
		Carbon monoxide	No limit set [Note 1]	Periodic	Every three years	MCERTS BS EN15058
A2 [Point A2 on site plan in Schedule 7]	Cooler stack via cyclone bag filter, and carbon filter	Particulate matter	20 mg/m ³	Hourly average	Continuous measurement	BS EN 13284-1
A3 [Point A3 on site plan in Schedule 7]	Dust suppression unit stack via bag filter	Particulate matter	20 mg/m ³	Hourly average	Continuous measurement	BS EN 13284-1
A4 [Point A4 on site plan in Schedule 7]	Grinder exhaust via bag filter and carbon filter	Particulate matter	10 mg/m ³	Hourly average	Continuous measurement	BS EN 13284-1
A5 [Point A5 on site plan in Schedule 7]	Drier storage vacuum via cyclone	Particulate matter	20 mg/m ³	Hourly average	Continuous measurement	BS EN 13284-1
A6 [Point A6 on site plan in Schedule 7]	Digest and oil tanks	No parameter set	No limit set	--	--	--
Note 1: This emission limit applies from 01 January 2030, unless otherwise advised by the Environment Agency.						

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 [Point S1 on site plan in schedule 7] emission to Thames Water foul sewer	Treated process effluent from onsite reverse osmosis plant	No parameters set	No limit set	--	--	--

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements

Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
SW1 [Point SW1 on site plan in schedule 7] emission to site drainage system	Uncontaminated surface water run-off via interceptor	No parameter set	No limit set	--	--	--
SW2 [Point SW2 on site plan in schedule 7] emission to site drainage system	Uncontaminated surface water run-off via interceptor	No parameter set	No limit set	--	--	--

Table S3.3 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 [Point S1 on site plan in schedule 7] emission to Thames Water foul sewer	Treated process effluent from onsite reverse osmosis plant	No parameters set	No limit set	--	--	--

Table S3.4 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Main building, storage tanks, silos, odour abatement plant	Odour	Daily	Olfactory monitoring	Odour detection at the site boundary
Storage tanks and silos	Integrity checks	Weekly	Visual assessment	--
Secondary containment	Integrity checks	Monthly	Visual assessment	--
Odour abatement system	Key process parameters as agreed in writing by the Environment Agency	In accordance with manufacturer's recommendations	--	Odour abatement system shall be regularly checked and maintained to ensure optimum treatment efficiency as agreed in

Table S3.4 Process monitoring requirements

Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				writing with the Environment Agency.

Schedule 4 – Reporting

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

Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air	A2, A3, A4, A5	Every 12 months	1 January
Parameters as required by condition 3.5.1	A1 (MCPD Boiler emission point)	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

Parameter	Units
Dog biscuits	tonnes

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Raw materials usage	Annually	tonnes
Waste	Annually	tonnes
COD efficiency	Annually *	COD te/te product

*COD efficiency to be calculated on a weekly frequency, reported annually

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*	
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.

“average over the sampling period” means the average value of three consecutive measurements of at least 30 minutes each, unless otherwise stated, as defined in the General Considerations section of the Food, Drink & Milk Industries BAT Conclusions.

“emissions to land” includes emissions to groundwater.

“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.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW. An “existing medium combustion plant” is combustion plant operating before 20 December 2018.

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

“Pests” means Birds, Vermin and Insects.

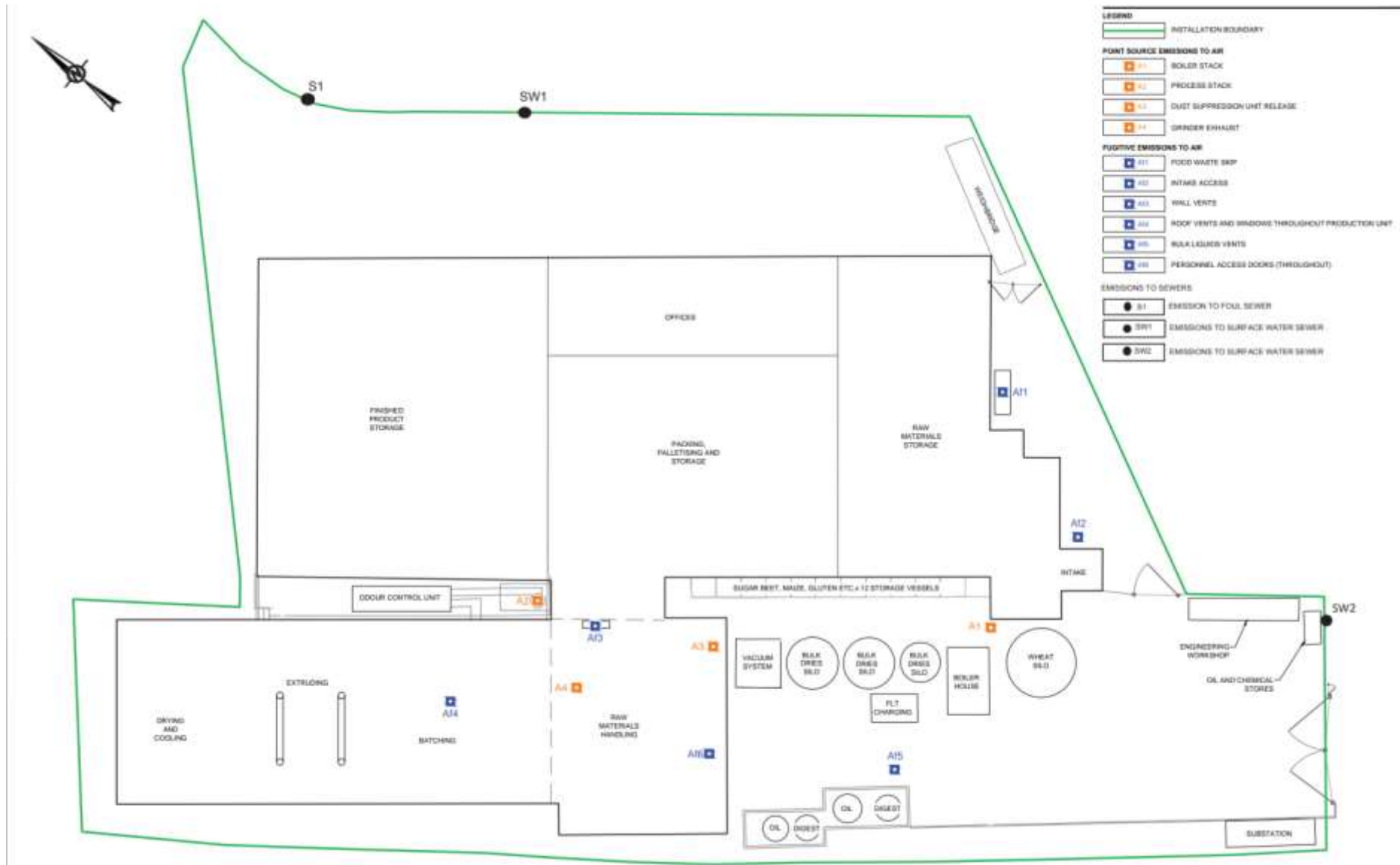
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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

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

“year” means calendar year ending 31 December.

Schedule 7 – Site plan



END OF PERMIT