



Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Inspired Pet Nutrition Limited
Dalton Pet Foods Manufacturer
Dalton Airfield
Topcliffe
Thirsk
North Yorkshire
YO7 3HE

Variation application number

EPR/BQ0526IZ/V008

Permit number

EPR/BQ0526IZ

Dalton Pet Foods Manufacturer

Permit number EPR/BQ0526IZ

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 2025 for boiler 1 and 2030 boiler 2 and CHP.

Dalton Pet Foods produces and packages dry pet food. Raw materials are received and stored in enclosed bulk silos or bags before being weighted, sieved and transferred by enclosed auger conveyors to the grinding room. Following grinding, the materials are mixed in a 3-tier system, steam conditioned and extruded through a die before being cut into pellet form. The pellets are passed through a drier, then sprayed with oil or fat after which they are air cooled and finally packed into bags for onward retail.

The site operates 24 hours a day 7 days a week. The annual processing capacity is 200,000 tonnes with a daily processing capacity of 600 tonnes.

The Environmental Permit is for the main listed activity falling under Section 6.8 Part A1 (d)(iii)(aa)

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 (where the weight of the finished product excludes packaging)—

(iii) 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

(aa) 75 if A is equal to 10 or more

where 'A' is the portion of animal material in percent of weight of the finished product production capacity.

The main emissions to air are from two onsite boilers which all operate on natural gas, Boiler 1 has a thermal input of 4.6 MWth and Boiler 2 has a thermal input of 6.0 MWth. In addition, there is an onsite combine heat and power (CHP) plant which also operates on natural gas and has a thermal input of 1.1 MWth. All the combustion plants on site are considered to be existing under the MCPD. Emissions of particulate matter arising from the onsite coolers/dryers and grinders are abated by bag filters and cyclones.

There are no direct discharges to water from the site, process effluent from the site, process effluent arising from the main factory building is channelled into a septic system and removed from site by tanker for treatment and disposal. Process effluent arising from the fresh ingredient kitchen is collected in IBCs and removed from site for treatment at a 3rd party anaerobic digestion site. Uncontaminated surface water arising from runoff and roofs flows to an unnamed drainage ditch and infiltrates into the ground.

The main site is centred on NGR SE 41922 75601, with the small animal feed production facility (Topcliffe Mill) centred on NGR SE 41777 75272. The main site is located approximately 6.7km south of the town of Thirsk in a predominantly industrial area. The closest residential receptors are approximately 1.1km to the northeast in the village of Dalton. There are no recorded protected habitats within the appropriate screening distances.

The schedules specify the changes made to the permit.

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 BQ0526IZ received	Received 13/09/2004	Application received for new Pet food production site.
Response to request for information	Request dated 22/11/2004	---
Permit determined BQ0526IZ	11/01/2005	---
Variation Notice RP3439XS issued	22/03/2008	Variation EPR/BQ0526IZ/V002 issued.
Variation EPR/BQ0526IZ/V003	Duly Made 19/08/2011	Application to increase the capacity of the site from 90,000 tonnes/year to 150,000 tonnes/year and the addition of a 3 rd processing line.
Variation determined EPR/BQ0526IZ	09/02/2012	Varied permit issued.
Application EPR/BQ0526IZ/V004 (variation)	Duly made 09/01/2013	Application to install a combined heat and power (CHP) plant.
Variation determined EPR/BQ0526IZ	18/02/2013	Varied permit issued.
Application EPR/BQ0526IZ/V005 (variation)	Duly made 23/04/2014	Application to add a fourth extruder, increase capacity, include Topcliffe Mill as a directly associated activity and introduce other changes at Dalton Mill.
Additional information received	23/04/2014	Information required to include Topcliffe Mill as a directly associated activity.
	23/04/2014	
	23/05/2014	Confirmation of noise attenuation measures for the new grinder, capacity of the liquid tank bund, dust filtration on vents and new emission point locations.
Variation determined EPR/BQ0526IZ	30/06/2014	Varied permit issued.
Application received EPR/BQ0526IZ/V006	Duly made 05/12/2018	Variation to add a new boiler, reconfigure existing emission points and change the company name.
Response to the first Schedule 5 Notice, dated 18/12/2018	06/02/2019	Response to question one providing a completed H1 screening tool.
Responses to the second Schedule 5 Notice, dated 16/04/2019	21/05/2019	Response to question one providing an air quality assessment.
	23/05/2019	Receipt of the model input files for the air quality assessment.
Response to request for information email, dated 31/10/2019	04/12/2019	Submission of an updated site emission points plan.

Status log of the permit		
Description	Date	Comments
Variation determined EPR/BQ0526IZ/V006	19/12/2019	Varied permit issued to Inspired Pet Nutrition Limited.
Application EPR/BQ0526IZ/V008 (variation and consolidation)	Regulation 61 Notice response received 08/07/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Application EPR/BQ0526IZ/V007 (variation and consolidation)	Duly Made 02/02/2023	Variation to expand process by installing a Fresh Ingredient Kitchen to produce fats and liquid meats on site.
Additional information received	Schedule 5 notice response 17/03/2023	Updated odour management plan (V2.1), site and emission plan (IPN Emissions Points – 2023 – Rev 03)
Variation determined and consolidation issued EPR/BQ0526IZ/V007	05/05/2023	Varied and consolidated permit issued in modern format.
Request for further information for Application EPR/BQ0526IZ/V008 dated 23/05/2023	Response received 19/06/2023 20/06/2023	Further information regarding the following BATc 1 -7, 9, 11, 12, 14, 15 & 17 in addition to submission of a revised copy of the Regulation 61 Response and clarification of the emissions to surface water and emissions to air from the site.
Request for further information for Application EPR/BQ0526IZ/V008 dated 23/06/2023	Response received 05/07/2023	Further clarification regarding BATc 1, 2, 3, 6, 7, 8, 9, 10, 11, 14 and details regarding the emissions from emission points A2, A12.
Variation determined and consolidation issued EPR/BQ0526IZ (Billing ref. GP3341QE).	23/08/2023	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/BQ0526IZ

Issued to

Inspired Pet Nutrition Limited (“the operator”)

whose registered office is

Dalton Airfield

Topcliffe

Thirsk

North Yorkshire

YO7 3HE

company registration number 02495237

to operate a regulated facility at

Dalton Pet Foods Manufacturer

Dalton Airfield

Topcliffe

Thirsk

North Yorkshire

YO7 3HE

to the extent set out in the schedules.

The notice shall take effect from 23/08/2023.

Name	Date
Sandra Cavill	23/08/2023

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/BQ0526IZ

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BQ0526IZ/V008 authorising,

Inspired Pet Nutrition Limited (“the operator”),

whose registered office is

Dalton Airfield

Topcliffe

Thirsk

North Yorkshire

YO7 3HE

company registration number 02495237

to operate an installation at

Dalton Pet Foods Manufacturer

Dalton Airfield

Topcliffe

Thirsk

North Yorkshire

YO7 3HE

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

Name	Date
Sandra Cavill	23/08/2023

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

1.1.1 The operator shall manage and operate the activities:

- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
- (b) using sufficient competent persons and resources.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

1.2.1 The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

1.3.1 The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

1.4.1 The operator shall take appropriate measures to ensure that:

- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
- (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
- (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).

2.2 The site

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

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.

2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.

- 3.1.2 The limits given in schedule 3 shall not be exceeded.
- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2) the first monitoring measurements shall be carried out within four months of 01/01/2025 for Boiler 2 and 01/01/2030 for Boiler 1 and the CHP; 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.

3.4 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 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 A(1)(d)(i) 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 (where the weight of the finished product excludes packaging) – only animal raw materials (other than milk only) with a finished product production capacity greater than 75 tonnes per day	Production of extruded dry pet food at Dalton Mill. Processing of raw material (frozen/fresh animal material) in a Fresh Ingredient Kitchen (FIK) to produce liquid fats and oils.	Manufacturing of dry pet food, from the receipt of raw materials (including raw meat) to the storage, handling and cooking through to despatch of finished product and wastes produced by the process Production capacity is limited to 600 tonnes per day.
Directly Associated Activity			
AR2	Steam and electrical power supply	Medium Combustion plants: <ul style="list-style-type: none"> • 1 x 4.6 MWth natural gas fired boiler • 1 x 6.0 MWth natural gas fired boiler • 1 x 1.1 MWth gas fired CHP Plant 	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	Use of refrigerants	Use of refrigerants in cooling, chilling and/or freezing systems at the installation.	From receipt of raw materials to dispatch of final product.
AR5	Small animal feed production	Blending, packing and warehousing of dry materials for the production of small animal feed at Topcliffe Mill	Receipt of raw materials to despatch of finished product
AR6	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.
AR7	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR8	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to a drainage ditch located to the north of the site.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	The response to questions 2.1 and 2.2 given in pages 9 to 34 of the application and appendix 2.1 'In Process.	13/09/2004
Further Information Letter	Paragraph 2.	26/11/2004
Application for a permit variation	All.	13/12/2007
Variation application EPR/BQ0526IZ/V003	Section 5 supporting information, section 6 – H1 Environmental risk assessment and section 8 – Dispersion modelling assessment.	04/07/2011 and 19/08/2011
Variation application EPR/BQ0526IZ/V004	Response to questions 2b, 5a, 5c, and 6 within part C2 and questions 3, 4a-b and 6a-b within part C3 of the application documents.	09/01/2013
Variation application EPR/BQ0526IZ/V005	Section 7 – Statement of BAT Compliance.	27/02/2014
	Section 5 – Supporting Information.	10/04/2014
	Section 9 – Site Condition Report.	23/04/2014
Response to Schedule 5 Notice dated 30/04/2014	All.	23/05/2014
Response to request for information email, dated 31/10/2019	Updated site emission points plan.	04/12/2019
Application EPR/BQ0526IZ/V007	Parts C2 and C3 of the application documents and all associated supporting information including: <ul style="list-style-type: none"> • Non-technical summary • BAT assessment • Environmental Risk Assessment • Odour Management Plan • Specification of waste holding tank – DAF model 6 – ref 22-085-ME-03 	Duly Made 02/02/2023
Response to Schedule 5 Notice dated 22/02/2023	<ul style="list-style-type: none"> • Updated Odour Management Plan (V2.1) • Emission point plan (IPN Emissions Points – 2023 – Rev03) 	17/03/2023
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	Received 08/07/2022
Request for further information dated 23/05/2023	Further information regarding the following BATc 1 - 7, 9, 11, 12, 14, 15 & 17 in addition to submission of a revised copy of the Regulation 61 Response and clarification of the emissions to surface water and emissions to air from the site.	Received 19/06/2023 & 20/06/2023
23/06/2023	Further clarification regarding BATc 1, 2, 3, 6, 7, 8, 9, 10, 11, 14 and details regarding the emissions from emission points A2, A12.	Received 05/07/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC4	<p>The operator shall submit, for approval by Environment Agency, a report setting out progress to achieving the 'Narrative' BAT where BAT 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. Associated targets/timelines, if applicable, for reaching compliance by 4 December 2023. <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc's 1, 2 and 6. Refer to BAT Conclusions for a full description of the BAT requirement.</p>	04/12/2023
IC 5	<p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall develop a replacement plan for the refrigerant system(s) at the installation. This shall be incorporated within the existing environmental management system by the specified date.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible. • An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP. 	04/12/2023
IC 6	<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 points A1a, A1b, A2, A3, A4a, A4b, A5, A6, A7a, A7b, A10 A11 and A12, identifying the fractions within the PM₁₀ and PM_{2.5} 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>	23/08/2024 or as agreed in writing with the Environment Agency
IC 7	<p>The Operator shall produce a Site Condition Report (SCR) in line with our H5 Guidance. The report shall contain the information necessary to determine the state of soil and groundwater, and ensure this is maintained throughout the life of the permit by using the results to better inform the SPMP. The report shall be submitted to the Environment Agency for review.</p>	23/08/2024 or as 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
A1a [Point A1a on site plan in schedule 7]	Extruder 1 Dryer via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A1b [Point A1b on site plan in schedule 7]	Extruder 1 Cooler via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A1c [Point A1c on site plan in schedule 7]	Extruder Steam Flashoff 1	No parameter set	No limit set	--	--	--
A2 [Point A2 on site plan in schedule 7]	Extruder 1 Grinder 2 via bag filter	Particulate matter	10mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A3 [Point A3 on site plan in schedule 7]	Extruder 1 Grinder 1 via bag filter	Particulate matter	10mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A4a [Point A4a on site plan in schedule 7]	Extruder 2 Cooler 2 via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A4b [Point A4b on site plan in schedule 7]	Extruder 2 Dryer 2 via cyclone & Steam Flashoff 2	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A5 [Point A5 on site plan in schedule 7]	Extruder 3 Grinder 4 via bag filter	Particulate matter	10mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A6 [Point A6 on site plan in schedule 7]	Extruder 1 Grinder 3 via bag filter	Particulate matter	10mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A7a [Point A7a on site plan in schedule 7]	Extruder 3 Dryer 3 via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A7b [Point A7b on site plan in schedule 7]	Extruder 3 Cooler 3 via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A8 [Point A8 on site plan in schedule 7]	Extruder 3 and Steam Flash Off 3	No parameter 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 [Point A9 on site plan in schedule 7]	CHP 1 1.1MWth waste heat boiler fired on natural gas	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190mg/m ³ [Note 1]	Periodic	Every three years [Note 3]	BS EN 15267-3
		Carbon monoxide	No Limit			BS EN15058
A10 [Point A10 on site plan in schedule 7]	Extruder 4 Cooler 4 via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A11 [Point A11 on site plan in schedule 7]	Extruder 4 Dryer 4 via cyclone	Particulate matter	20mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A12 [Point A12 on site plan in schedule 7]	Extruder 4 Grinder 5 via bag filter	Particulate matter	10mg/m ³	Average over sampling period	Annually	BS EN 13284-1
A13 [Point A13 on site plan in schedule 7]	Extruder 4 Steam Flash Off 4	No parameter set	--	--	--	--
A14 [Point A14 on site plan in schedule 7]	Boiler 1 4.6MWth Boiler fired on natural gas	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	250mg/m ³ [Note 1]	Periodic	Every three years [Note 3]	BS EN 14792
		Carbon monoxide	No Limit			BS EN15058
A15 [Point A15 on site plan in schedule 7]	Boiler 2 6.0MWth Boiler fired on natural gas	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	200mg/m ³ [Note 2]	Periodic	Every three years [Note 4]	BS EN 14792
		Carbon monoxide	No Limit			BS EN15058
A16 [Point A16 on site plan in schedule 7]	FIK Air Outlet	No parameter set	--	--	--	--
A17 [Point A17 on site plan in schedule 7]	FIK Air Outlet 2	No parameter set	--	--	--	--
A18 [Point A18 on site plan in schedule 7]	Wet waste flue gas	No parameter 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
Note 1: The limits shall only apply from 01/01/2030 (unless the boiler and/or the CHP is replaced). Note 2: The limits shall only apply from 01/01/2025 (unless the boilers are replaced). Note 3: The monitoring requirements shall only apply from 01/01/2030 (unless the boiler and/or the CHP is replaced). Note 4: The monitoring requirements shall only apply from 01/01/2025 (unless the boilers are replaced).						

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
W1 [Point W1 on site plan in schedule 7 discharge to drainage ditch]	Clean and uncontaminated site drainage water	No Parameter Set	--	--	--	--

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 Parameters as required by condition 3.5.1	A1a, A1b, A2, A3, A4a, A4b, A5, A6, A7a, A7b, A10, A11 & A12	Every 12 months	1 January
	A9, A14 & A15	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
Pet food	tonnes

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
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	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
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.

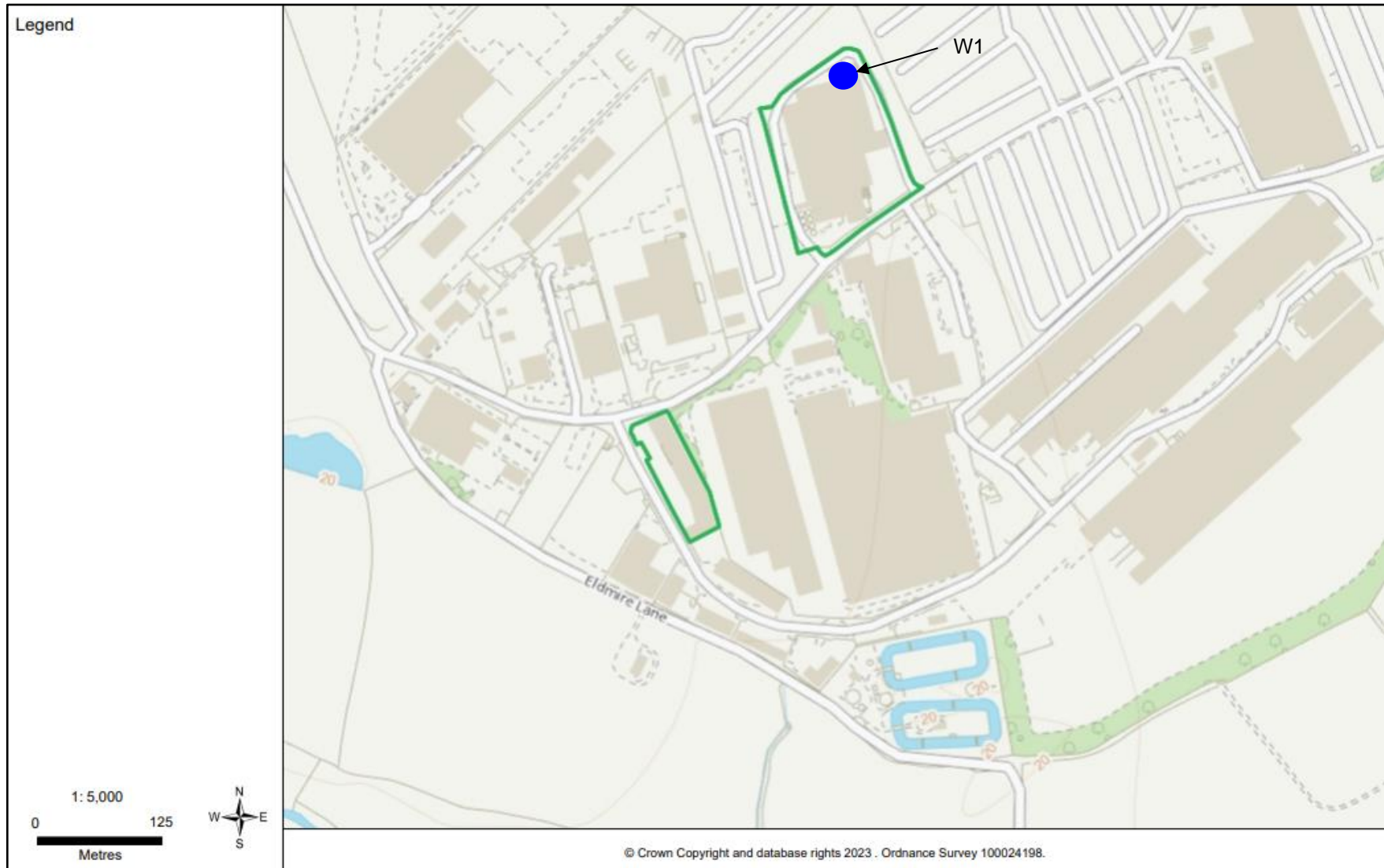
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

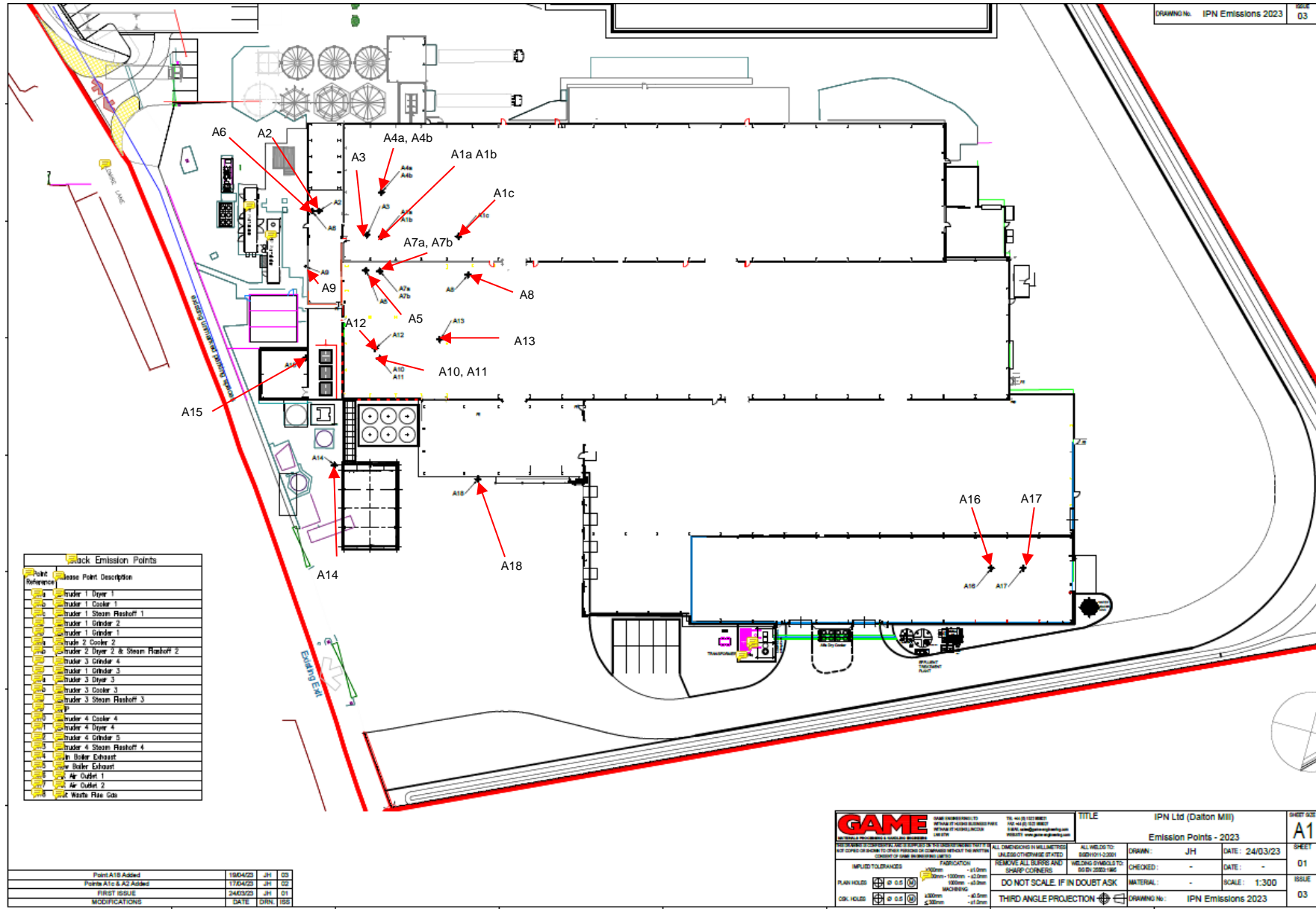
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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