

Permitting Decisions - Bespoke Permit

We have decided to grant the permit for Greencore Boston, The Found Riverside Industrial Estate, Marsh Lane, Boston, operated by Greencore Food to Go Limited.

The permit number is EPR/JP3942YV/A001.

The application is for an existing food and drink installation coming into the Environment Agencies regulation due to increased production levels. The site produces a mixture of prepared salads. Production is seasonal with higher production in the summer. The types of salads prepared include dry salads and wet salads containing various meats that are heated through steam cooking. The site is in operation 24 hours a day, 7 days a week. Operations during unsocial hours are restricted to inside closed buildings.

The primary listed activity falls under Section 6.8 Part A(1)(d)(iii)(aa) of the Environmental Permitting Regulations (EPR) 2016:

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.

There is also a secondary activity which falls under Section 5.4 (a)(ii). This activity relates to non-hazardous waste installation – physico-chemical treatment for disposal.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It:

- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- highlights [key issues](#) in the determination
- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise we have accepted the applicant’s proposals.

Read the permitting decisions in conjunction with the environmental permit.

Key issues of the decision

Best Available Techniques (BAT) Assessment

The BAT conclusions for the food, drink and milk industries were published by the European Commission on 19 December 2019. We have reviewed the key measures proposed by the Operator for this application and assessed them against the relevant BAT requirements. The measures provided in the application are summarised below.

BAT ref.	Indicative BAT	Key measures proposed
1	Environmental management system (EMS)	<p>The operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 1.</p> <p>The operator is undergoing a review to align with the Food Drink and Milk (FDM) indicative BAT and that of ISO14001:2015. The operator expects compliance with BATc 1, i, ii, iv, v, vii, x, xii, xiv, xv, xvii, xix as well as incorporating the Odour Management Plan (OMP) (BAT 15), inventory of inputs & outputs to increase resource efficiency and reduce emissions (BATc 2), and energy efficiency plan (BATc 6) by 4th December 2023. Improvement Condition IC1 has been included to ensure this is achieved.</p>
2	EMS – inventory of inputs & outputs to increase resource efficiency and reduce emissions.	<p>The operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 2.</p> <p>As with BATc 1, the operator is undergoing a review to align with the Food Drink and Milk (FDM) indicative BAT and that of ISO14001:2015. The operator expects compliance by with BATc 2 (iii) by 4th December 2023. IC2 has been included to</p>

		ensure this is achieved.
3	Emissions to water – monitor key process parameters	<p>The operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 3.</p> <p>As with BATc 1 & 2, the operator is undergoing a review to align with the Food Drink and Milk (FDM) indicative BAT and that of ISO14001:2015. The operator expects compliance by with BATc 3 by 4th December 2023. Currently flow, pH and temperature are only monitored by Anglian Water. The operator will start monitoring discharge from the on-site ETP KPIs. This requirement has been tied into IC2 to included monitoring.</p>
4	Monitor emissions to water	<p>We are satisfied that BATc 4 is not applicable to this Installation.</p> <p>BATc 4 only applies to direct discharges. The operator only contributes indirect discharge after discharging to the Anglian Waters sewer treatment works.</p>
5	Monitor channelled emissions to air	<p>BATc 5 sets out air emissions monitoring requirements applicable to specific FDM sub-sectors. None of these monitoring requirements are applicable to this site as the activities undertaken at Greencore Boston are not specified in the sector and specific processes set out in BATc 5.</p> <p>We are therefore satisfied that BATc 5 is not applicable to this site.</p>
6	Energy efficiency	<p>The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 6.</p> <p>An energy efficiency plan has been provided and the operator is using the following techniques:</p> <ul style="list-style-type: none"> • Combustion plant operation optimised through:

		<ul style="list-style-type: none"> ○ Burner control ○ Management systems ○ Annual balancing and efficiency testing ○ Inspections in-line with suppliers' guidance ● Burner regulators in the main process ovens upgraded and optimised ● Programmable Logic Controller (PLC) control systems optimise the process including: <ul style="list-style-type: none"> ○ cooling plant operating on different loads (summer/winter) ○ Variable speed drives on pumps ○ Fans and motors where practical ● Site configuration is optimised to reduce inefficiency in steam/hot water distribution with relevant infrastructure insulated to minimise losses from below/above ambient conveying systems, blow down minimised through use of conductivity measurements and optimised condensate return. ● Compressed air leak surveys and repairs ● Lighting efficiency upgrade programme
7	Water and wastewater minimisation	<p>The operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 7.</p> <p>The operator is using the following techniques:</p> <ul style="list-style-type: none"> ● (a) Water reuse and recycling is reviewed, and opportunities implemented in line with hygiene and food safety standards. ● (b) Water control devices are employed widely across the site to automatically adjust the volume and flow of water to meet operational needs. ● (c) Water pressure, restrictors, flow

		<p>control and number of hoses are optimised at the site</p> <ul style="list-style-type: none"> • (d) Site drains across the site direct uncontaminated rainwater away from the on-site Effluent Treatment Plant (ETP). As capital projects are approved further opportunities will be implemented. There is limited opportunity for the use of uncontaminated rainwater within the installation. • (e) Clean As You Go policy is employed with operational and hygiene SOPs requiring dry cleaning of surfaces and equipment. • (h) Cleaning chemical use is optimised. The hygiene team are actively procuring environmentally friendly cleaning substances. • (i) Low pressure foam/gel cleaning is employed for walls and floors. • (j) The site is an existing facility. New project proposals and process layout reconfigurations consider the hygiene requirements of the process and ensure efficient cleaning can be facilitated. New equipment installations go through HAZOP and HACCP process to identify any potential issues. • (k) Clean As You Go policy is in place
8	Use of harmful substances	<p>The operator has provided information to support compliance with BATc 8. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 8.</p> <p>We consider that the operator will be future compliant with BATc 8. IC3 has been included in the permit to achieve compliance with BATc 8 to optimise design and construction of equipment and process areas.</p>
9	Use of refrigerants	<p>The operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are satisfied that the operator has</p>

		<p>demonstrated compliance with BATc 9.</p> <p>The operator has declared:</p> <ul style="list-style-type: none"> • Refrigeration systems meet current legislation • Replacements are chosen to be the lowest Global Warming Potential (GWP) possible that are suitable • Annual Maintenance and monitoring • No R22 used in the installation
10	Resource efficiency	<p>The operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 10.</p> <p>The operator is using the following technique:</p> <ul style="list-style-type: none"> • (c) Separation of residues
11	Emissions to water – wastewater buffer storage	<p>The operator has provided information to support compliance with BATc 11. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 11.</p> <p>The operator declared:</p> <ul style="list-style-type: none"> • Site prevents uncontrolled emissions by using a combination of control measures, including management controls combined with instrumentation and specifically designed equipment for the nature of the risks posed on site. • The site is able to contain effluent within the two reception pits and balance tank
12	Emissions to water - treatment	<p>We are satisfied that BATc 12 is not applicable to this Installation.</p> <p>BATc 12 and the BATc 12 AEL only applies to direct discharges. The operator only contributes indirect discharge after discharging to the Anglian Waters sewer treatment works.</p>

13	Noise – management plan (NMP)	<p>We are satisfied that BATc 13 is not applicable to this Installation.</p> <p>A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There has been no substantiated noise nuisance from the site therefore an NMP is not a requirement for this site.</p>
14	Noise minimisation	<p>The operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 14.</p> <p>The operator is using the following techniques:</p> <ul style="list-style-type: none"> • (a) Appropriate location of equipment and buildings • (b) Operational measures • (c) Low-noise equipment • (e) Noise abatement
15	Odour – management plan (OMP)	<p>The operator has provided information to support compliance with BATc 15. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 15.</p> <p>As per GOV.UK guidance for ‘Control and monitor emissions for your environmental permit’¹, an OMP was requested and supplied. However, there has been no substantiated odour complaints regarding the installation.</p> <p>¹ Control and monitor emissions for your environmental permit - GOV.UK (www.gov.uk)</p>

Impact on habitats sites

A Habitats Risk Assessment (HRA) was carried out for the statutory sites in a 10km vicinity of the installation. The following sites required assessment:

The Wash and North Norfolk Coast SAC (UK0017075)^~

The Wash SPA (UK9008021)^~

The Wash Ramsar (UK11072)^

^ Protected area under the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017

~ Marine Protected Area

HRA 1 assessment conclusion:

This is an existing installation which has been operating for several years and discharges to a foul sewer under Trade Effluent Consent before indirect discharge to the tidal/saline Witham Haven. Limits for chlorine and aluminium are not included within the trade effluent consent, therefore the Environment Agency has assessed the impact of these substances to the eventual discharge location using the H1 software tool. The installation has not been identified as posing a risk to the designated sites. We are satisfied that the proposed installation will not cause a likely significant effect on the identified designated sites alone and/or in combination.

Natural England was not consulted.

A HRA stage 2 was not required as it was concluded in HRA stage 1 that there is no effect to any of the above listed statutory sites.

We conclude there is no likely significant effect.

Hazardous chemical use and storage

The operator carried out a H1 screening assessment to identify potentially harmful chemicals to the environment. The emissions of Ethylene-diaminetetraacetic acid (EDTA) could not be screened out as insignificant. It's important to note that the assessment was carried out under the worst-case assumptions being that 100% of the EDTA used within the installation enters the site drainage system and that none of the released EDTA is removed through the ETP at the Boston site.

The concentration of EDTA within process water was determined using the maximum concentration within Holquat listed on the Material Safety Data Sheets (MSDS) (20%); the annual usage figure for Holquat (74 000 kg) and the measured average daily volume of effluent discharged from Site (575 m³ / day).

The operator has identified other potential ecotoxicological substances which screened out of the H1 assessment such as, Chlorofoam, Sodium Hypochlorite, Holquat, Causbrite, Chlordet, Nipac, and TWH.

We believe the operator has adequately assessed potential environmental impact to the environment and is currently operating in such a way that poses low risk.

The operator will implement a procedure for the continual identification of chemicals less harmful to the environment by 4th December 2023 in compliance with BATc 8 and the Water Framework Directive (WFD) (2000/60/EC). We have included IC3 in the permit to achieve compliance with BATc 8.

Bulk storage containment

The operator currently stores most of its polluting substances in bulk storage containers within secondary containment. However, two of the storage tanks are not protected with bunding as outlined in the submitted document *Application Bespoke Appendix E - Raw Materials and Tank Inventory*. This applies to the ammonia plant which holds 17,400 litres and chilled water tank which holds 1,500 litres. Additionally, there is no record of the last bund integrity test for any bulk storage containment bund. The operator has already taken steps to identify damaged or insufficient site surfaces and secondary containment.

Although there has been no history of flooding, this installation is within a high-risk flood zone and has the potential to cause soil and/or ground water contamination if any of the primary or secondary containment, and/or connecting pipes were compromised.

We have included IC4 which requires the operator to submit a plan detailing how they propose to review site infrastructure and secondary containment to ensure that the guidance requirements are met. The Environment Agency's web guidance Control and monitor emissions for your environmental permit section, Leaks from containers states that, as a minimum, bunding shall be:

- 110% of the largest tank the bund is protecting, or
- 25% of the combined volume of all the tanks the bund is protecting, whichever is the larger

In addition, the bunding should meet the following:

- have no outlets (e.g. drains or taps)
- drain to a blind (completely enclosed) collection point
- have self-contained pipework that is separate from the container pipework

The operator's plan will also need to detail timescales for the implementation of these measures.

Odour

There has been no history of odour or substantiated odour complaints regarding from the installation and there is no odour from the production process itself. However, as per GOV.UK guidance for '[Control and monitor emissions for your environmental permit](#)' and permitting under section 5.4 A (1) (a) (ii), a OMP was

requested and provided by the operator. A OMP was deemed warranted as there is steam cooking used in the production process. The steam cooking however does not vent to atmosphere.

Other considerations as to why a OMP was warranted is the on-site ETP which can be potentially odorous.

We have assessed the OMP and satisfied that appropriate measures are in place.

Discharge to sewer

The operator currently operates an on-site ETP to treat site process water prior to discharge to an Anglian Water foul sewer via intermediate pumping station prior to treatment at Boston Sewage Treatment Works. The cleaned effluents are then eventually discharged into the Witham Haven. The operator has a trade effluent consent to discharge the effluent from the sewerage undertaker. The installation prevents uncontrolled emissions by using a combination of control measures, including management controls combined with instrumentation and specifically designed equipment for the nature of the risks posed within the installation. The installation is able to contain effluent within the two reception pits and balance tank.

Surface water run-off from the site is routed via the surface water drainage system to either the Black Sluice controlled water on the southeast of site, from the surface water drains at the north of site or runs off the south yard to the unmade ground to the south of Site.

The operator has measures in place to protect drainage systems from spills of raw materials or wastes, including self-bunding of the polypropylene effluent tank, level controls through alarms and pump set points, roofed bunds for externally stored IBCs, spill procedures and spill kits. All potential accident scenarios, mitigation measures and response actions are included in the site's emergency procedures.

Wastewater treated on site originates from the following processes: i) Clean In Place and general sanitising of factory after the preparation and washing of salads and vegetables, ii) tray washing, iii) boiler blowdown, iv) softener backwash, vi) compressor condensate. After removal of some solids by filtration (e.g., drain catch pots), process effluent is received in either one of two 25m³ concrete drainage sumps; the low care sump east of the facility or high care sump located on the west.

From the sumps, effluent was pumped through a solids separation screen (2mm) which removes process debris (salads), the debris discharges into dolav collection bins and enters an appropriate waste stream. The two 'screened' effluent streams are then mixed as they enter a 40m³ double skinned polypropylene buffer tank, with cascade aeration. This balance tank provides a

method of balancing and homogenising the effluent. Effluent is pumped to drain over a calibrated 'v' notch to measure flow volume. Prior to discharge, the effluent passes through a 4-bottle auto sampler to allow for effluent chemistry monitoring.

We have assessed the risks posed and deemed it to be low risk and within the relevant environmental quality standards.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Local Authority – Environmental Health
- Health and Safety Executive
- Sewerage Authorities
- UK Health Security Agency (Previously Public Health England) and the relevant director of Public Health
Local authority Environmental Protection Department - Air Quality Specialist

The comments and our responses are summarised in the [consultation responses](#) section.

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation' and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided plans which we consider to be satisfactory.

These show the extent of the site of the facility including the discharge points.

The plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances, we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

As part of the application, we carried out a habitats assessment of the site and the surrounding area.

Please see the '[Impact on habitats sites](#)' sub-section under 'Key issues of the decision' for a summary of the assessment.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

Operating techniques

We have reviewed the techniques proposed by the operator and compared these with the relevant technical guidance and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory.

We have assessed the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our assessment of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The plan has been incorporated into the operating techniques S1.2.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included IC1 in the permit to ensure that the operator will be compliant with BATc 1. It reads as follows:

"The operator shall provide a revised written Environmental Management System (EMS) plan to the Environment Agency for approval that meets the requirement of BATc 1 and ISO14001:2015 standard by 4th December 2023".

We have included IC2 in the permit to ensure that the operator will be compliant with BATc 2 (iii) and BATc 3. It reads as follows:

"The operator shall submit a written plan to the Environment Agency to meet BATc 2 (iii) and BATc 3 for approval that includes:

Proposals to undertake representative monitoring of point source water emissions listed in table S3.1.

The proposals shall include the following monitoring requirements:

- The emission points that are to be monitored (S1)
- Monitoring for:
 - Flow
 - pH
 - Temperature

Monitoring shall either be MCerts or MCerts accreditation, where available".

We have included IC3 in the permit to ensure that the operator will be compliant with BATc 8. It reads as follows:

"Produce a report identifying current hazardous chemicals used for cleaning and/or in the production process and evaluate the use non-hazardous alternative as outlined in BATc 8".

We have included IC4 in the permit to ensure that the installation's bunding integrity is tested and inspected for any leaks and potential for leaks. It reads as follows:

“The operator shall submit a written plan to the Environment Agency for technical assessment and approval. The plan must assess the operational effectiveness of secondary containment in the Effluent Treatment Plant (ETP) and surrounding area. It must consider the design, method of construction and integrity of the system, and be varied out by a suitably competent and qualified personnel. The assessment shall be made against the requirements of our guidance and CIRIA C736(ref 1-3). Where improvement requirements are identified, the plan must contain dates for their implementation. Improvements should include (but are not limited to):

- Bunding is at least 110% against the capacity of primary containment for each container
- Ensuring that leak screens drain within bunded areas
- Investigations to confirm that containment would be effective, in the event of balance tank failure
- Integrity testing of bunds and drains and a schedule for bund testing.
- Sealing off drains which are unused or which would compromise the containment plan
- Modification of containment design, so that bunded areas or sub-areas collect and do not drain back to the ETP inlet
- Any associated repairs or modifications to existing infrastructure
- Plans for testing and maintenance to ensure ongoing fitness for purpose

The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan. You must implement the plan as approved, and from the date stipulated by the Environment Agency

References:

1. <https://www.gov.uk/guidance/pollution-prevention-for-businesses>
2. <https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit>
3. CIRIA C736 Containment systems for the prevention of pollution- Secondary, tertiary and other measures for industrial and commercial premises, London 2014, ISBN: 978-0-86017-740-1

Emission Limits

We have decided that emission limits are not required in the permit. While there are boilers on site, all of them are less than 1MW and out of scope for the Medium Combustion Plant Directive (MCPD).

The operator carried out emissions monitoring on the 28th of September 2022, to provide an up-to-date data set of emissions from the existing site boilers plant.

This information was used to conduct an Air Quality Assessment in order to determine baseline conditions and quantify potential effects.

Dispersion modelling was undertaken in order to predict pollutant concentrations at sensitive locations as a result of emissions from the relevant energy plant. The results indicated that impacts on pollutant concentrations were not predicted to be significant at any human or ecological receptor location in the vicinity of the installation.

Reporting

We have specified reporting in the permit.

Management System

IC1 – IC3 have been included to ensure that the operator will be able to comply with the permit conditions by the specified date of 4th December 2023.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points.

A full review of the management system is undertaken during compliance checks.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all

specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

We advertised this application on our website for comment between 8th June 2023 to 6th July 2023 and received the following responses:

Responses from organisations listed in the consultation section:

Response received from: Sewerage Authorities – Anglian water.

Brief summary of issues raised:

1. Trade effluent is treated at the Boston Water Recycling Centre and discharges to the Witham Haven and not the River Nene as stated in the application. The Witham Haven is tidal/saline (TRaC), as such we are not sure that the correct screening test has been applied by the applicant in the context of EDTA.
2. We are aware of the new effluent treatment plant and are assessing this in the context of trade effluent discharged to foul sewer.
3. We have no concerns regarding water resources or any designated sites that Anglian Water has an interest in.

Summary of actions taken:

1. Updated permit wording to ensure that Witham Haven is listed as the final discharge point after treatment at the Boston Water Recycling Centre.

2. Currently agreed discharges to Anglian water's sewage treatment works listed in the key issues section of this document.
3. No action taken.

Response received from: Boston Borough Council

Brief summary of issues raised:

1. Complaint from direct neighbour regarding 'humming' noise audible in bedroom overlooking site during night. Complainant sort advice but dealt directly with Greencore Management.
2. Complaint from direct neighbour regarding flooding of his yard by wastewater from holding tank near the boundary of his site. Greencore manage cleared the discharge which had result from a failure of a temporary holding system in operation at that time. Not recurred.
3. "Having checked the history of the site I have found no enforcement cases and some planning applications. The site is located in an industrial estate and is in an area where other similar business types are located in close proximity. There have been several planning applications determined over the years but when the business was called Freshtime not Greencore."

Summary of actions taken:

1. We contacted the operator in regard to this complaint to gather more detail. The source of the noise was identified to be staff exiting the installation and raising their voices in unsocial hours. All shifts are now trained on awareness of sound and their behaviours within the boundaries of the installation. The noise was not caused by any production processes.
2. While this was caused by a temporary holding system, this has influenced the decision to include IC4 into the permit to check all secondary containment and carry out bund integrity testing.
3. No action has been taken

Response received from: UK Health Security Agency

Brief summary of issues raised:

"The main emissions of potential concern are products of combustion from the boilers and steam generators on site. We have however assessed the submitted documentation and note the conclusions that emissions are unlikely to result in a failure of local air quality standards or pose a significant risk to public health.

Based on the information contained in the application supplied to us, UKHSA has no significant concerns regarding the risk to the health of the local population from the installation.

This consultation response is based on the assumption that the permit holder shall take all appropriate measures to prevent or control pollution, in accordance with the relevant sector guidance and industry best practice.”

Summary of actions taken: The emissions to air was deemed not to pose any risk to the environment and the boilers are out of scope of the MCPD as they are less than 1MWth. We evaluated the data submitted by the operator and there is no substantial risk.

No responses were received from the Local Authority – Environmental Health, Health and Safety Executive, Local authority Environmental Protection Department - Air Quality Specialist, Local Area Regulatory Team, Fisheries, Biodiversity and Geomorphology (FBG), Area Groundwater and Contaminated Land (GWCL) Team. One public representation was submitted to the Environment Agency response to the web advert on gov.uk – Response 524812714 from Boston Borough Council.