

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Princes Limited

Bridge Road Food Factory
Bridge Road,
Long Sutton,
Lincolnshire,
PE12 9EQ

Variation application number

EPR/RP3534FP/V005

Permit number

EPR/RP3534FP

Bridge Road Food Factory

Permit number EPR/RP3534FP

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.

The schedules specify the changes made to the permit.

The main features of the permit are as follows.

The installation site covers an area approximately 4.2 hectares and is located approximately 1.5 km east southeast of Long Sutton town centre - NGR - TF4490822216. The site is bounded by roads to the north and west, a fence line with agricultural land beyond to the east and a further fence line by a dismantled railway track to the south. In general, the site is surrounded by open agricultural (arable) land. The installation comprises a factory for the receipt and preparation of foods canned for human consumption.

The product range comprises mainly cans of beans in tomato sauce, pulses and peas, fruit, pasta products, vegetables, ready meal products, sauces, rice pudding and canned meat products.

The prescribed process includes the following activities:

- Materials delivery, handling, unpacking and storage
- Raw material preparation
- Size reduction
- Heat process using steam
- Cleaning and sanitation

Other ancillary activities with the potential for significant emissions are steam generation and effluent treatment.

All materials are delivered to the site by road and are controlled by specific delivery procedures to ensure their correct and safe delivery. Bulk storage containers are banded by either integral or secondary containment.

The initial steps of the operation involve the preparation of raw materials using various methods including feedstock cleaning and de-stoning, soaking, sorting, screening, and grading as well as peeling. Water is reused/recycled for as long as practicable and air emissions/odour are minimised by passing the exhaust mixture through an expansion/cooling vessel prior to release to the environment. Any reject waste material is collected and taken for recycling off site.

The site undertakes the following listed activities:

'Section 6.8 A(1)(d)(iii) - Treatment and processing, of the following raw materials, intended for the production of food or feed (where the weight of the finished product excludes packaging):

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 75 tonnes per day.'

'Section 5.4 Part A(1) (b) (i) - Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.'

Industry standard mincers and dicers are operated on the site for size reduction of ingredients, (e.g., fruit, vegetables, and meat). Mixing on site is undertaken at ambient temperatures with no releases to the environment.

Blanching and sterilising steps involve the use of heat provided entirely by steam throughout the site. Blanching involves the direct injection of steam into the raw material/product mix. Blanching water is reused for as long as practicable. Sterilisation is undertaken using either continuous rotary sterilisers or hydrostat towers depending on the product.

Process effluent is treated at the on-site effluent treatment plant which consists of collection pit, screen, balancing tank, primary clarifiers, conditioning tank UASB digester (Upflow Anaerobic Sludge Blanket) with flare stack, aeration tanks, secondary clarifiers and odour filters, prior to being discharged to the River Nene.

There is a designated European Site within 10km radius of the site, The Wash is a Ramsar Site, a Special Protection Area, a Special Area of Conservation and a Site of Special Scientific interest. A climate change agreement and an Environmental Management System are in place at the site which is ISO14001 accredited.

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 BO1599IQ (A001) (Under PPC 2000)	Duly made 02/06/2005	--
Additional Information requested	19/09/2005	29/09/2005 and 06/10/2005
Additional Information requested (email)	07/03/2006	08/03/2006
Permit BO1599IQ determined	27/04/2006	--
Variation Application NP3935UY (V002)	Duly made 29/03/07	Issued 21/01/2008
Variation Application GP3836UN (V003)	Duly made 22/05/07	Issued 27/09/2007
Variation Application WP3431UC (V004)	Duly made 20/08/2007	Issued 31/07/2008
Receipt of additional information for WP3431UC	15/02/2008	--
Variation Application YP3239XU (V005)	Duly made 17/12/2007	Issued 19/12/2007
Application EPR/LP3837KF/T001 (Under EPR 2007) (full transfer of permit EPR/BO1599IQ)	Duly made 11/03/2010	Application to transfer the permit in full to Premier Food Group Limited.
Transfer determined EPR/LP3837KF	16/03/10	Full transfer of permit complete.
Application EPR/RP3534FP/T001 (full transfer of permit EPR/LP3837KF)	Duly made 17/08/2011	Application to transfer the permit in full to Princes Limited.

Status log of the permit		
Description	Date	Comments
Transfer determined EPR/RP3534FP	30/08/11	Full transfer of permit complete.
Variation application EPR/RP3534FP/V002	Duly made 04/04/2013	Issued 08/05/2013
Agency variation determined EPR/RP3534FP/V003	02/12/2013	Agency variation to implement the changes introduced by IED.
Variation application EPR/RP3534FP/V004	Duly made 25/03/2020	Variation to introduce new line, raw materials storage area, upgrade anaerobic digestion system and increase permit boundary.
Variation application EPR/RP3534FP/V004 additional information received	20/11/2020	Revised Odour Management Plan, details for proposed containment, update on monitoring and clarification on scope of variation.
Variation application determined EPR/RP3534FP/V004	29/01/2021	Varied and consolidated permit issued to the operator.
Application EPR/RP3534FP/V005 (variation and consolidation)	Regulation 61 Notice response received 04/10/2022.	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Application EPR/RP3534FP/V005 Additional information received	29/09/2023	Information received relating to various BATcs and EPLs.
Variation determined and consolidation issued EPR/RP3534FP (Billing ref. JP3848QA).	15/11/2023	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/RP3534FP

Issued to

Princes Limited (“the operator”)

whose registered office is

Royal Liver Building

Pier Head

Liverpool

L3 1NX

company registration number 02328824

to operate a regulated facility at

Bridge Road Food Factory

Bridge Road,

Long Sutton,

Lincolnshire,

PE12 9EQ

to the extent set out in the schedules.

The notice shall take effect from 15/11/2023

Name	Date
Beccy Brough	15/11/2023

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/RP3534FP

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/RP3534FP/V005 authorising,

Princes Limited (“the operator”),

whose registered office is

Royal Liver Building

Pier Head

Liverpool

L3 1NX

company registration number 02328824

to operate an installation

Bridge Road Food Factory

Bridge Road,

Long Sutton,

Lincolnshire,

PE12 9EQ

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

Name	Date
Beccy Brough	15/11/2023

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”).
- 2.1.2 The activities shall be undertaken in accordance with best available techniques.
- 2.1.3 All process plant and equipment shall be commissioned, operated and maintained and shall be fully documented and recorded in accordance with the manufacturer’s recommendations.
- 2.1.4 For the following activities referenced in schedule 1, table S1.1 (AR2) Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

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 (AR3) the first monitoring measurements shall be carried out within four months of 01/01/2025 (boiler 1, 2, 4, 5 and 6) and 01/01/2030 (Boiler 3) 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 but including ammonia) 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.
- 3.2.4 The operator shall implement a leak detection and repair (LDAR) programme to detect and mitigate the release of volatile organic compounds, including methane from diffuse sources.

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
- (b) process monitoring specified in table S3.3.

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

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

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

3.6 Pests

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

3.6.2 The operator shall:

- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
- (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

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

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

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

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

4.2 Reporting

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

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

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

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

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

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

4.3 Notifications

4.3.1 In the event:

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

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

- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Following the detection of an issue listed in condition 4.3.1, the operator shall review and revise the management system and implement any changes as necessary to minimise the risk of re-occurrence of the issue.
- 4.3.4 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.
- 4.3.5 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.
- 4.3.6 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.
- 4.3.7 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.8 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)(iii)(aa)	<p>Treatment and processing, of the following raw materials, intended for the production of food or feed (where the weight of the finished product excludes packaging):</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 75 tonnes per day.</p> <p>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.</p>	<p>From receipt of raw material delivered to the site to the dispatch of finished product.</p> <p>Production capacity is limited to 910.94 tonnes per day.</p>
AR2	Section 5.4 Part A(1) (b) (i)	<p>Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving biological treatment.</p>	<p>From generation of wastewater to discharge to River Nene, following the treatment of water through equalisation, neutralisation, screening and settlement, on site Anaerobic Digestion, Nitrification and Denitrification, sedimentation and ultrafiltration.</p> <p>Anaerobic digestion of waste in tanks followed by burning of biogas produced from the process.</p>
Directly Associated Activity			
AR3	Steam and electrical power supply	<p>Medium Combustion plants:</p> <p>2 x 8.3 MWth Natural gas fired boilers</p> <p>1 x 7.4 MWth Natural gas fired boiler</p> <p>1 x 5.4 MWth Natural gas fired boiler</p> <p>1 x 4.4 MWth Natural gas fired boiler</p>	<p>From receipt of fuel to release of products of combustion to air.</p>

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
		1 x 8.3 MWth Natural & Bio gas fired boiler	
AR4	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.
AR5	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.
AR6	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR7	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the local Dyke.
AR8	Emergency flare operation	Incineration on land	Undertaken in relation to Activity AR 2. From the receipt of biogas produced at the on-site anaerobic digestion process to incineration with the release of combustion gases. Use of 1 auxiliary flare required only during periods of breakdown or maintenance of boiler 5, biogas upgrading plant and/or auxiliary boiler(s).
AR9	Gas storage	Storage of gas produced from on-site Anaerobic Digestion plant.	Undertaken in relation to Activity AR2. Storage of biogas produced from on-site anaerobic digestion of permitted waste in 1 bag tank. From the receipt of biogas produced at the on-site anaerobic digestion process to despatch for use within the facility.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application	The response to questions 2.1 and 2.2 given in section B2.1 to B2.2 of the application template Form PPC 1 on pages 9 – 40. Response to request for further information dated 29/09/05, 06/10/05, and 10/02/06. Sections 2.1.1 to 2.1.10 inclusive of the application for variation (WP3431UC) and additional information modules 2.1 to 2.10 inclusive.	21/03/2005 23/07/2007 15/02/2008
Application EPR/RP3534FP/V004	Application forms C2 and C3 and supporting documentation excluding Odour Management Plan.	23/03/2020
Further information received Application EPR/RP3534FP/V004	Revised Odour Management Plan, Issue 2, dated 20/11/2020 Details for proposed containment set out in 'Technical Note – Initial Bund Alignment Note 01' dated 02/06/2020 Update on monitoring and clarification on scope of variation set out in document 'ED111556115 EA RFI Response Letter – Final to EA' dated 20/11/2020	20/11/2020
Regulation 61 (1) Notice – Responses to questions dated 09/06/2022	All parts	Received 04/10/2022
Request for further information dates 11/09/2023	Details regarding compliance with BAT3, 4, 6, 9 and 11. In addition to Energy and Waste EPLs. Discussions regarding BAT 12 and AELs.	Received 29/09/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC23 (a)	The Operator shall submit a detailed operability action plan which details the phases of post-commissioning testing and operational methodologies for the effluent treatment system, with timescales for completion, in order to ultimately meet the Emission Limit Values as detailed in Table S3.1	3 months from permit issue
IC23 (b)	Having regard for the requirements of action plan as per IC23(a), the operator shall demonstrate compliance with the emissions limit value for Total Nitrogen, as detailed in Table S3.1	12 months from permit issue
IC23 (c)	Having regard for the requirements of action plan as per IC23(a), the operator shall demonstrate compliance with the emissions limit value for Total Phosphorus, as detailed in Table S3.1	18 months from permit issue
IC24	The operator shall submit, for approval by Environment Agency, a report demonstrating achievement of 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: Methodology applied for achieving BAT Demonstrating that BAT has been achieved. The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 4, 6(a) and 7(a). Refer to BAT Conclusions for a full description of the BAT requirement.	2 months from permit issue
IC25	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.	2 months from permit issue

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
	<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"> • An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP. 	
IC26	<p>The operator shall produce a climate change adaptation plan, which will form part of the EMS.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> • Details of how the installation has or could be affected by severe weather; • The scale of the impact of severe weather on the operations within the installation; • An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation. <p>The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	12 months from permit issue

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 – Boiler 1 (8.3 MWth, natural gas)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	300 mg/m ³ [Note 1]	Hourly average	Annual	BS EN 14792
		Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 2]	Periodic	Every three years [Note 2]	BS EN 14792
		Carbon monoxide	No Limit [Note 2]	Periodic	Every three years [Note 2]	MCERTS BS EN15058
A2 [Point A2 on site plan in Schedule 7]	Boiler Plant – Boiler 2 (7.4 MWth, natural gas)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	300 mg/m ³ [Note 1]	Hourly average	Annual [Note 1]	BS EN 14792
		Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 2]	Periodic	Every three years [Note 2]	BS EN 14792
		Carbon monoxide	No Limit [Note 2]	Periodic	Every three years [Note 2]	MCERTS BS EN15058
A3 [Point A3 on site plan in Schedule 7]	Boiler Plant – Boiler 3 (4.4 MWth, natural gas)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	300 mg/m ³ [Note 3]	Hourly average	Annual [Note 3]	BS EN 14792
		Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	250 mg/m ³ [Note 4]	Periodic	Every three years [Note 4]	BS EN 14792
		Carbon monoxide	No Limit [Note 4]	Periodic	Every three years [Note 4]	MCERTS BS EN15058

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
A4 [Point A4 on site plan in Schedule 7]	Boiler Plant – Boiler 4 (8.3 MWth, natural gas)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	300 mg/m ³ [Note 1]	Hourly average	Annual [Note 1]	BS EN 14792
		Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	200 mg/m ³ [Note 2]	Periodic	Every three years [Note 2]	BS EN 14792
		Carbon monoxide	No Limit [Note 2]	Periodic	Every three years [Note 2]	MCERTS BS EN15058
A5 [Point A5 on site plan in Schedule 7]	Boiler Plant – Boiler 5 (8.3 MWth, natural gas 90%, Bio Gas 10%)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	300 mg/m ³ [Note 1]	Hourly average	Annual [Note 1]	BS EN 14792
		Sulphur dioxide	No limit	Hourly average	6 monthly	BS EN 14791
		Hydrogen sulphide	5 mg/m ³	Average over the sampling period	6 monthly	US EPA Method 11
		Total VOCs	No limit	--	--	BS EN 12619:2013
		Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 2]	Periodic	Every three years [Note 2]	BS EN 14792
		Carbon monoxide	No Limit [Note 2]	Periodic	Every three years [Note 2]	MCERTS BS EN15058
A6 [Point A6 on site plan in Schedule 7]	Boiler Plant – Boiler 6 (5.4 MWth, natural gas)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	300 mg/m ³ [Note 1]	Hourly average	Annual [Note 1]	BS EN 14792
		Oxides of Nitrogen (NO and	200 mg/m ³ [Note 2]	Periodic	Every three years	BS EN 14792

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
		NO ₂ expressed as NO ₂)			[Note 2]	
		Carbon monoxide	No Limit [Note 2]	Periodic	Every three years [Note 2]	MCERTS BS EN15058
A14 [Point A14 on site plan in Schedule 7]	Biofilter	Hydrogen sulphide	5 mg/m ³	Average over the sampling period	6 monthly	US EPA Method 11
A15 [Point A15 on site plan in Schedule 7]	Biogas emergency flare [Note 5]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	150 mg/m ³	Hourly average	Annual	BS EN 14792
		Carbon monoxide	50 mg/m ³	Hourly average	Annual	BS EN 15058
		Total VOCs	10 mg/m ³	Hourly average	Annual	BS EN 12619:2013
<p>Note 1: Emission limit and monitoring frequency applicable until 1 January 2025.</p> <p>Note 2: Emission limit and monitoring frequency applicable as per condition 3.1.4 - This emission limit and/or monitoring requirement applies from 1 January 2025, unless otherwise advised by the Environment Agency.</p> <p>Note 3: Emission limit and monitoring frequency applicable until 1 January 2030.</p> <p>Note 4: Emission limit and monitoring frequency applicable as per condition 3.1.4 - This emission limit and/or monitoring requirement applies from 1 January 2030, unless otherwise advised by the Environment Agency.</p> <p>Note 5: Following commissioning, monitoring to be undertaken in the event the emergency flare has been operational for more than 10 per cent of a year (876 hours).</p>						

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 on site plan in schedule 7 emission to local dyke	Uncontaminated roof water and yard drainage (East)	No parameters set	--	--	--	--
W2 on site plan in schedule 7 emission to local dyke	Uncontaminated roof water and yard drainage (West)	No parameters set	--	--	--	--
W3 on site plan in schedule 7 emission to local dyke	Uncontaminated roof water and yard drainage (North)	No parameters set	--	--	--	--
W4 on site plan in schedule 7 emission to River Nene	Effluent Treatment plant	Volume	4000m ³	Maximum 24 hour	Continuous	Continuous flow meter
		Temperature	36°C	Maximum	Continuous	Temperature probe
		Chemical Oxygen Demand	100 mg/l [Note 1] [Note 4]	Spot	Daily	BS EN 6068
		Total suspended solids	50mg/l	Spot	Daily	BS EN 872
		Biological Oxygen Demand	40 mg/l quarterly average 80 mg/l daily	Spot	Daily	BS EN 1899-1
		Total Nitrogen	20 mg/l [Note 2] [Note 4]	Spot	Daily	Various EN standards available (e.g. EN 12260, EN ISO 11905-1)
		Ammoniacal nitrogen expressed as N	20 mg/l quarterly average 40 mg/l maximum	Spot	Daily	BS EN 15923-1
		Total phosphorus	2 mg/l [Note 3] Note 4]	Spot	Daily	EN ISO 6878 or EN ISO 15681-1 and -2 or EN ISO 11885
		Oil and grease	None visible	Spot	Daily	Visual inspection

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
<p>Note 1: The emissions limit value is 120 mg/l where the abatement efficiency is $\geq 95\%$, as an annual average.</p> <p>Note 2: The emission limit value is 30 mg/l where the abatement efficiency is $\geq 80\%$, as an annual average.</p> <p>Note 3: The emission limit value is 5 mg/l where the abatement efficiency is $\geq 95\%$, as an annual average.</p> <p>Note 4: The emission limit values apply from completion of IC23(a) (b) and (c)</p>						

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
Biogas in digester	Flow	Continuous	In accordance with EU weights and measures Regulations	Process monitoring to be recorded using a SCADA system where relevant. Gas monitors to be calibrated every 6 months or in accordance with the manufacturer's recommendations
	Methane	Continuous	None specified	
	CO ₂	Continuous	None specified	
	O ₂	Continuous	None specified	
	Hydrogen sulphide	Daily	None specified	
	Pressure	Continuous	None specified	
Digester(s) and storage tank(s)	Integrity checks	Weekly	Visual assessment	In accordance with design specification and tank integrity checks.
Diffuse emissions from all sources identified in the Leak Detection and Repair (LDAR) programme	VOCs including methane	Every 6 months or otherwise agreed in accordance with the LDAR programme	BS EN 15446 In accordance with the LDAR programme	Monitoring points as specified in a DSEAR risk assessment and LDAR programme. Limit as agreed with the Environment Agency as a percentage of the overall gas production.
Emergency flare	Operating hours	Continuous	Recorded duration and frequency. Recording using a SCADA system or similar system	Date, time and duration of use of auxiliary flare shall be recorded.
	Quantity of gas sent to emergency flare			Quantity can be estimated from gas flow composition, heat content, ratio of assistance, velocity, purge gas flow rate, pollutant emissions.
Pressure relief valves and vacuum systems	Gas pressure	Continuous	Recording using a SCADA system	Continuous gas pressure shall be monitored.

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
	Re-seating	Weekly inspection	Visual	Operator must ensure that valves are re-seated after release in accordance with the manufacturer's design.
	Inspection, maintenance, calibration, repair and validation	Following foaming or overtopping or at 3 yearly intervals whichever is sooner.	Written scheme of examination in accordance with condition 1.1.1	After a foaming event or sticking, build-up of debris, obstructions or damage, operator must ensure that pressure relief valve function remains within designed gas pressure in accordance with the manufacturer's design by suitably trained and qualified personnel.
	Inspection, calibration and validation report	In accordance with design and construction specifications or after over topping or foaming event	Written scheme of examination in accordance with condition 1.1.1	<p>Operator must ensure that valves are re-seated after release, after a foaming event or sticking, build-up of debris, obstructions or damage.</p> <p>Operator must ensure that PRV function remains within designed operation gas pressure in accordance with the manufacturer's design by suitably trained/qualified personnel.</p> <p>Inspection, calibration and validation report. In accordance with industry</p>

Table S3.3 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
				Approved Code of Practice
Storage lagoons and storage tanks	Volume	Daily	Visual or flow metre measurement	750 mm freeboard must be maintained for storage lagoons. Records of volume must be maintained.
Biofilter	Flow	Daily	In accordance with EU weights and measures Regulations	-
	Temperature	As required	Temperature probe	Biofilter shall be regularly checked and maintained to ensure appropriate temperature and moisture content
	pH	Daily	None specified	
	Water consumption	Daily	None specified	
	Moisture	As required	None Specified	
	Thatching/compaction	As required	None Specified	
Carbon filtration system	Key process parameters to include air flow and absorbency	In accordance with manufacturer's recommendations.	None specified	Odour abatement system shall be regularly checked and maintained to ensure appropriate temperature and moisture content. Carbon filter(s) to be replaced when saturated in accordance with manufacturer's recommendations.

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	A14	Every 6 months	1 January
	A15	Every 12 months	1 January
	A1, A2, A3, A4, A5, A6	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
Point source emissions to water (other than sewer) Parameters as required by condition 3.5.1	W4	Quarterly	1 January, 1 April, 1 July & 1 October
Process monitoring – digester tank integrity Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 5 years from the date of commissioning or as per the manufacturer's recommendation, whichever is sooner	1 January
Process monitoring – under and over pressure relief systems Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months Yearly summary report of over-pressure and under-pressure events detailing mass balance release	1 January
Process monitoring – leak detection and repair (inspection, calibration and maintenance) Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 3 years	1 January
Process monitoring – use of emergency flare Parameters as required by condition 3.5.1	As specified in schedule 3 table S3.3	Every 12 months	1 January

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

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste	Annually	tonnes
COD efficiency	Annually*	COD te/te product
Food waste	Annually	Tonnes
Emergency flare operation	Annually	hours
*COD efficiency to be calculated on a weekly frequency, reported annually		

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Point source emissions to water (other than sewer)	Emissions to Water Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Process monitoring	Form process 1 or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Food Waste	Food waste Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1 06/02/2023
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.	
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Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

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

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

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

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

“Food waste” reporting: Reporting of food waste to use a methodology such as the global Food Loss and Waste Accounting and Reporting Standard (FLW standard) , WRAP’s Target Measure Act initiative or similar.

“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.

“Leak detection and repair (LDAR) programme” means a structured approach to reduce fugitive emissions of organic compounds by detection and subsequent repair or replacement of leaking components. Currently, sniffing (described by EN 15446) and optical gas imaging methods are available for the identification of leaks as set out in BAT 14 and section 6.6.2 of the Waste Treatment BAT Conclusions.

“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.

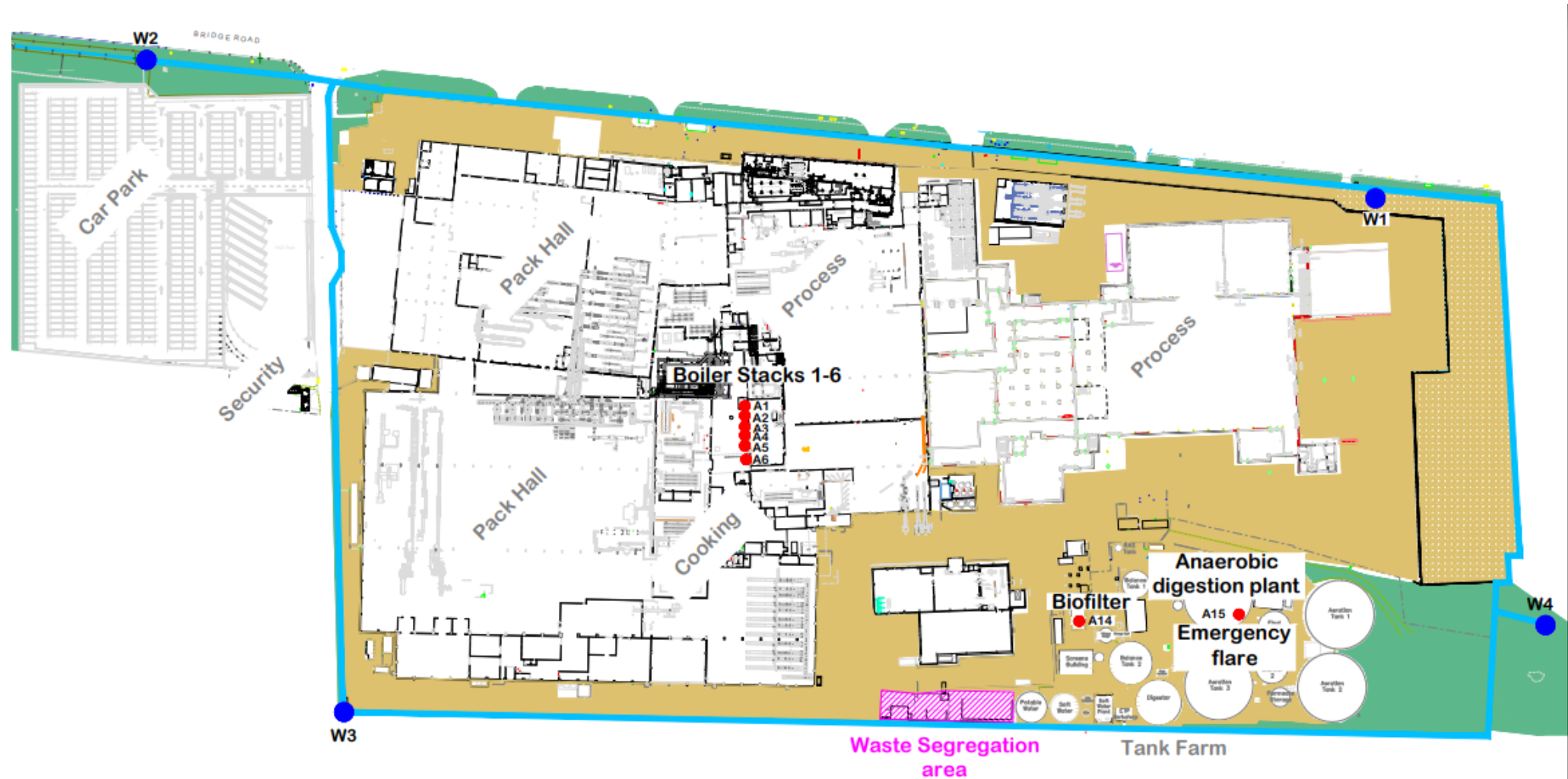
Unless otherwise stated, any references in this permit to concentrations of substances in emissions into air means:

- 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, 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

