

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

GA Pet Food Partners Group Limited

Plocks Farm Pet Food Production
Liverpool Road
Bretherton
Preston
Lancashire
PR26 9AX

Variation application number

EPR/SP3937PB/V012

Permit number

EPR/SP3937PB

Plocks Farm Pet Food Production

Permit number EPR/SP3937PB

Introductory note

This introductory note does not form a part of the notice

Under the Environmental Permitting (England & Wales) Regulations 2016 (schedule 5, part 1, paragraph 19) a variation may comprise a consolidated permit reflecting the variations and a notice specifying the variations included in that consolidated permit.

Schedule 1 of the notice specifies the conditions that have been varied and schedule 2 comprises a consolidated permit which reflects the variations being made. All the conditions of the permit have been varied and are subject to the right of appeal.

This consolidated permit has been issued following a full review against the best available techniques (BAT) conclusions for the Food, Drink and Milk Industries published on 4th December 2019 in the official journal of the European Union.

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2030.

The schedules specify the changes made to the permit.

The main features of the permit are as follows:

Plock Farm is a dry pet food producing installation situated in Preston at National Grid Reference SD 46160 20779, off Liverpool Road at approximately 1km from Tarleton Town. The key steps in the manufacture process are dosing, blending, grinding, drying, and cooling together with conveyance of raw materials and finished products. Raw materials, primarily comprising food ingredients, are stored on site together with a 10,000 litre bunded diesel tank for the company's vehicles fleet.

The site falls under the following Environmental Permitting Regulations:

Section 6.8 Part A1 (d) (iii) (bb) - 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 - 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—300-(22.5 x A) in any other case, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.

Section 5.4 Part A1 (a) (i) - Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban wastewater treatment(4)—biological treatment.

The site operates an biological effluent treatment plant (ETP) where process effluent is treated in different stages including primary filtration, equalisation, neutralisation, nitrification, denitrification, coagulation, flocculation, direct air flotation (DAF), phosphorous precipitation and recovery, filtration aerobic and anaerobic treatment, dewatering, and tertiary filtration via membrane bioreactor (MBR) for enhanced phosphorus reduction before the treated effluent is discharge to River Douglas via water emission point W3. Uncontaminated run-off waters from roofs and yards are discharged to the same river through emission points W2 and W4 via interceptors.

The site operates medium combustion plants (MCPs) in the form of three existing boilers of an aggregated 7.12 MWth input capacity in addition to a Combined Heat and Power (CHP) MCP of 3.3 MWth input for the scope of steam and energy generation to be used in the production process. The emissions from these MCPs together of exhaust gases generated by various manufacturing processes are released into the atmosphere.

The exhaust gases from associated production processes such as drying, milling, and cooling activities that result in dust particulates being generated are filtered through a dry filtering system in the form of bag filters, wet scrubbers and pumice biobeds to ensure that exhaust gases released in the atmosphere are free from dust.

There are two Special Protection Areas (SPAs) and two Ramsar sites, Ribble & Alt Estuaries and Martin Mere in addition to three Local Wildlife Sites.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

Status log of the permit		
Description	Date	Comments
Application received EPR/SP3937PB/A001	Duly made 27/08/2004	Application received for the production of pet food
Additional information received	14/07/2005	CAP technology report: Evaluation of DAF Clarification for the Treatment of Site Effluent.
Notice requesting for further information (11/08/2005)	09/09/2005	--
Letter requesting further information (04/11/2005)	08/11/2005	--
Letter from applicant	27/02/2006	Environment Agency response dated (24/04/2006
Variation YP3032LQ (EPR/SP3937PB/V002)	22/05/2006	Variation issued
Environment Agency initiation Variation BP3936XN (EPR/SP3937PB/V003) (03/04/2008)	09/05/2008	Variation issued
Variation application GP3833GA received (EPR/SP397PB/V004)	17/06/2008	--
Further information request (02/07/2008)	07/07/2008	--
Variation GP38833GA (EPR/SP3937PB/V004)	30/08/2008	--
Variation EPR/SP3937PB/V005 received	30/04/2010	--
Further information request	17/06/2010	Assessment of particulates
Further information provided	--	Supplementary odour assessment dated 13/05/10
Further information request, Schedule 5 Notice (27/07/2010)	20/08/2010	--
Further information request (16/08/2010)	26/08/2010	--
Additional information (24/08/2010)	24/08/2010	Amended site plan
Draft decision variation EPR/SP3937PB/V005	28/09/2010	--
Variation EPR/SP3637PB/V005 issued	05/11/2010	--
Notified of change of company name	05/03/2013	Name changed to GA Pet Food Partners Group Limited
Variation issued EPR/SP3937PB/V006	02/04/2014	Varied permit issued to GA Pet Food Partners Limited
Environment Agency initiated variation determined EPR/SP3937PB/V007	28/02/2014	To implement the changes introduced by IED
Notified of change of registered office address	26/10/2015	Registered address changed to The Albert Suite, Unit 2 Revolution Park, Buckshaw Village, Chorley, Lancashire, PR7 7DW.
Variation issued EPR/SP3937PB/V008	01/12/2015	Varied permit issued to GA Pet Food Partners Group Limited
Application for a variation EPR/SP3937PB/V009	Dully made 18/01/2016	Application to vary the permit to reflect installation of an additional DAF plant.
Variation determined EPR/SP3937PB/V009	07/04/2016	Varied permit issued.

Status log of the permit		
Description	Date	Comments
Application for a variation EPR/SP3937PB/V010	20/09/2019	Application returned (deemed withdrawn)
Application for a variation EPR/SP3937PB/V011	Duly made 07/02/2020	Application for a variation to install a new ingredients kitchen and associated odour abatement plant, new CHP and add new emission points to existing biobeds.
Request for further information received	05/02/2021	Response to Schedule 5 dated 02/02/21 (including revised odour management plan)
Operator review response	15/02/2021	Revised emissions site plan and further details on abatement design parameters received.
Variation determined EPR/SP3937PB (Billing reference: ZP3006BR)	17/02/2021	Consolidated and varied permit issued.
Application EPR/SP3937PB/V012 (variation and consolidation)	Regulation 61 Notice response received 16/05/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Further information request (13/04/2023)	26/04/2023	Information relating to water discharge quality, air emissions from drying, energy efficiency measures, effluent discharge rate, site plan, balance tank 1 containment, CHP, product types.
Variation determined and consolidation issued EPR/SP3937PB (Billing ref. EP3548QG).	27/11/2023	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/SP3937PB

Issued to

GA Pet Food Partners Group Limited (“the operator”)

whose registered office is

**The Albert Suite
Unit 2 Revolution Park
Buckshaw Avenue
Buckshaw Village
Chorley
Lancashire
PR7 7DW**

company registration number 04085927

to operate a regulated facility at

**Plocks Farm Pet Food Production
Liverpool Road
Bretherton
Preston
Lancashire
PR26 9AX**

to the extent set out in the schedules.

The notice shall take effect from 27/11/2023.

Name	Date
Marcus Woodward	27/11/2023

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/SP3937PB

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/SP3937PB/V012 authorising,

GA Pet Food Partners Group Limited (“the operator”),

whose registered office is

**The Albert Suite
Unit 2 Revolution Park
Buckshaw Avenue
Buckshaw Village
Chorley
Lancashire
PR7 7DW**

company registration number 04085927

to operate an installation at

**Plocks Farm Pet Food Production
Liverpool Road
Bretherton
Preston
Lancashire
PR26 9AX**

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

Name	Date
Marcus Wooward	27/11/2023

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”).

2.2 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 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.

2.3.4 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 The first monitoring measurements of Boiler 1, Boiler 2 and Boiler 3 shall be carried out within four months of 01/01/2030 or of the date when the MCP is first put into operation, whichever is later.

3.2 Emissions of substances not controlled by emission limits

- 3.2.1 Emissions of substances not controlled by emission limits (excluding odour) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution, submit to the Environment Agency for approval within the period specified, an emissions management plan which identifies and minimises the risks of pollution from emissions of substances not controlled by emission limits;
 - (b) implement the approved emissions management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 3.2.3 All liquids in containers, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

3.4 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.
- (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) Surface water monitoring specified in table S3.3
 - (c) Process monitoring specified in table S3.4.

- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2, S3.3 and S3.4 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.

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

4.2 Reporting

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

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

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

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

Where the operator is a registered company:

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

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

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

In any other case:

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

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

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

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

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

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

4.4 Interpretation

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

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

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 Part A1 (d) (iii) (bb)	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: 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— (bb) $300 - (22.5 \times A)$ in any other case, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.	Main production area: From receipt of raw materials through to dispatch of final product, dry kibble pet food in bags. Production capacity is limited to 83,000 tonnes per year.
AR2			Fully automated ingredients kitchen: From receipt of raw materials through to dispatch of final product, dry kibble pet food in bags. Production capacity is limited to 150,000 tonnes per year.
AR3	Section 5.4 Part A1 (a) (i)	Biological treatment of non-hazardous waste water.	From generation of waste water to discharge to River Douglas. The ETP process consists of sedimentation, FOG removal, balancing, DAF, chemical dosing, flocculation and coagulations, filtration, dewatering, anaerobic and aerobic treatment, and tertiary filtration via membrane bioreactor.
Directly Associated Activity			
AR4	Storage and handling of fuels	Diesel storage.	Storage of diesel fuel in bunded tanks for use by onsite vehicles.
AR5	Steam and electrical power supply	Medium Combustion plants: Boiler 1: 2.49 MWth Boiler 2: 2.93 MWth Boiler 3: 1.70 MWth CHP 1: 3.30 MWth	From receipt of fuel to release of products of combustion to air.

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
		Natural gas fired MCPs.	
AR6	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.
AR7	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.
AR8	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.
AR9	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system for discharge to River Douglas via interceptor.
AR10	Wet scrubbing, biofiltration and carbon adsorption.	Control and abatement systems for emissions to air.	From receipt of air extracted from the process to the controlled release to atmosphere.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/SP3937PB/A001	The response to questions in Sections B2.1 and B2.2 of the application form given in pages 10 to 40 of the main application, excluding responses to sections B2.2.22 (ref L1), B2.2.24, B2.2.26, B2.2.27, B2.2.32, B2.2.36, B2.2.40 and B2.2.60.	27/08/2004
Response to permit Improvement Programme Reference 7	Site closure plan.	03/01/2008
Variation application EPR/SP3937PB/V005	Response to section 2 – Operating Techniques, Part C of application form. Section 2.0 (Operating Techniques), Section 4.0 (Appropriate measures for fugitive emissions) and Section 7.0 (Appropriate measures for noise) of Section (iv) – what the operator proposes the varied permit should contain.	30/04/2010
Variation application EPR/SP3937PB/V009	Non-technical Summary - Additional Dissolved Air Flotation (DAF).	18/01/2016
Variation application EPR/SP3937PB/V011	Chapter 9 – Dust Impact Assessment Technical Description of ECOMAX 33.	07/02/2020
Variation application EPR/SP3937PB/V011 Schedule 5 response	Response to Permit Variation Schedule 5, dated 04/02/21 Revised Odour Management Plan, dated February 2021.	05/02/2021
Regulation 61 (1) Notice – Responses to questions dated 31/01/2022	All parts	16/05/2022

Table S1.2 Operating techniques		
Description	Parts	Date Received
Request for further information dates 13/04/2023	Information relating to water discharge quality, air emissions from drying, energy efficiency measures, effluent discharge rate, site plan, balance tank 1 containment, CHP, product types.	26/04/2023

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC9	The Operator shall confirm in writing to the Environment Agency that the Narrative BAT requirements for the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 6(a) – Energy Management Plan were in place on or before 4 December 2023. Refer to BAT Conclusions for a full description of the BAT requirement.	1 month from permit issue

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
Fuel oil (diesel)	Less than 0.1% sulphur.

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 1 2.49 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No limit set [Note 1]	Periodic	Every three years	MCERTS BS EN15058
A2 [Point A2 on site plan in Schedule 7]	Boiler 2 2.93 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No limit set [Note 1]	Periodic	Every three years	MCERTS BS EN 15058
A7 [Point A7 on site plan in Schedule 7]	Balance tank (vent discharging through abatement system)	No parameter set	No limit set	--	--	--
A9 [Point A9 on site plan in Schedule 7]	17m ventilation chimney (Sediment tank and DAF plant vent discharging through abatement system)	Particulate matter	No limit set	[Note 2]	Every 18 months	BS EN 13284-1
		Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725
A10a & A10b [Point A10 a+b on site plan in Schedule 7]	Biobed 1	Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725
A11a & A11b [Point A11 a+b on site plan in Schedule 7]	Biobed 2	Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725
A12a & A12b [Point A12 a+b on site plan in Schedule 7]	Biobed 3	Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725
A13a & A13b [Point A13 a+b]	Biobed 4	Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725

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
on site plan in Schedule 7]						
A14a & A14b [Point A14 a+b on site plan in Schedule 7]	Biobed 5	Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725
A15 [Point A15 on site plan in Schedule 7]	Boiler 3 1.7 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	250 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792 [Note 2]
		Carbon monoxide	No limit set [Note 1]	Periodic	Every three years	MCERTS BS EN15058
A16 [Point A16 on site plan in Schedule 7]	Biobed 6	Odour units	No limit set [Note 3]	[Note 2]	Annual	BS EN 13725
A17 [Point A17 on site plan in Schedule 7]	CHP 1 3.3 MWth Natural gas fired	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	95 mg/m ³ [Note 4]	Periodic	Annual	BS EN 14792
		Carbon monoxide	No limit set	Periodic	Annual	MCERTS BS EN15058
		Ammonia	No limit set	Periodic	Annual	EN ISO 21877 or CEN TS 17337
<p>Note 1: This emission limit and/or monitoring requirement apply from 1 January 2030, unless otherwise advised by the Environment Agency.</p> <p>Note 2: The reference period shall be representative of a period of normal operation.</p> <p>Note 3: Trend analysis included in the odour management plan.</p> <p>Note 4: This ELV is applicable from the date of commissioning CHP 1.</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
W2 on site plan in schedule 7 emission to River Douglas	Uncontaminated surface water via interceptor	No parameter set	No limit set	--	Weekly [Note 1]	Visual inspection
W3 on site plan in schedule 7 emission to River Douglas	Effluent treatment plant	Total daily volume of discharge	650 m ³ /day	24-hour total	Continuous	MCERTS self-monitoring of effluent flow scheme
		Biochemical Oxygen Demand (BOD)	30 mg/l [Note 1]	Collected from final water storage tanks	Monthly	BS EN 1899-1
		Ammoniacal nitrogen (expressed as N)	10 mg/l	Collected from final water storage tanks	Monthly	BS EN 11732
		Phosphate	No limit set	Collected from final water storage tanks	Monthly	BS EN ISO 15681-1
		Suspended solids (SS)	45 mg/l	Collected from final water storage tanks	Monthly	BS EN 872
		pH	6 – 9	Collected from final water storage tanks	Weekly	BS ISO 10523
W4 on site plan in schedule 7 emission to River Douglas	Uncontaminated roof water and/or overflow from roof water wetland area pond 40	No parameters set	No limit set	--	Weekly [Note1]	Visual inspection

Note 1: These parameters would not normally require reporting but would be available for inspection at the site. Only where there is an operational need for a report to be made should one be required.

Table S3.3 Surface water and/or groundwater monitoring requirements				
Location or description of point of measurement	Parameter [Note 1]	Monitoring frequency	Monitoring standard or method	Other specifications
Discharge into River Douglas from emission point W3	Visual quality (clarity, presence of fats, oils or grease)	Weekly	In accordance with written procedure	--

Note 1: These parameters would not normally require to be reported but would be available for inspection at the site. Only where there is an operational need for a report to be made should one be required.

Table S3.4 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter (Note 1)	Monitoring frequency	Monitoring standard or method	Other specifications
W3 (collected from final water storage tanks)	Chemical Oxygen Demand (COD)	Weekly	Colorimeter	Results to be used to assess compliance with the limits set in Table S3.2
	Ammonium	Weekly	Colorimeter	Results to be used to assess compliance with the limits set in Table S3.2
	Total Suspended Solids	Weekly	Mass balance	Results to be used to assess compliance with the limits set in Table S3.2
	Phosphate	Weekly	Colorimeter	--
Carbon absorption abatement (emission point A9)	Comprehensive monitoring regime for the key process operating parameters to include as a minimum: - Activated carbon analysis - Activated carbon performance - Pressure measurements - Air discharge velocity	--	--	In accordance with the odour management plan
Wet scrubbers and biobeds (emission points A10a + b to A14a + b, & A16)	Comprehensive monitoring regime for the key process operating parameters to include, as a minimum, moisture and temperature.	--	--	In accordance with the odour management plan

Note 1: These parameters would not normally require to be reported but would be available for inspection at the site. Only where there is an operational need for a report to be made should one be required.

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	A1, A2, and 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
	A17	Annually	1 January
	A9, A10a, A10b, A11a, A11b, A12a, A12b, A13a, A13b, A14a, A11b, A16 & A17	Annually	1 January
Point source emissions to water (other than sewer) Parameters as required by condition 3.5.1	W3	Quarterly	1 January, 1 April, 1 July & 1 October
Process monitoring Parameters as required by condition 3.5.1	W3, A9, A10a, A10b, A11a, A11b, A12a, A12b, A13a, A13b, A14a, A11b, A16	Upon request	--

Table S4.2: Annual production/treatment	
Parameter	Units
Dry pet food	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste disposal and/or recovery	Annually	tonnes
COD efficiency	Annually*	COD te/te product
*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
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.

“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.

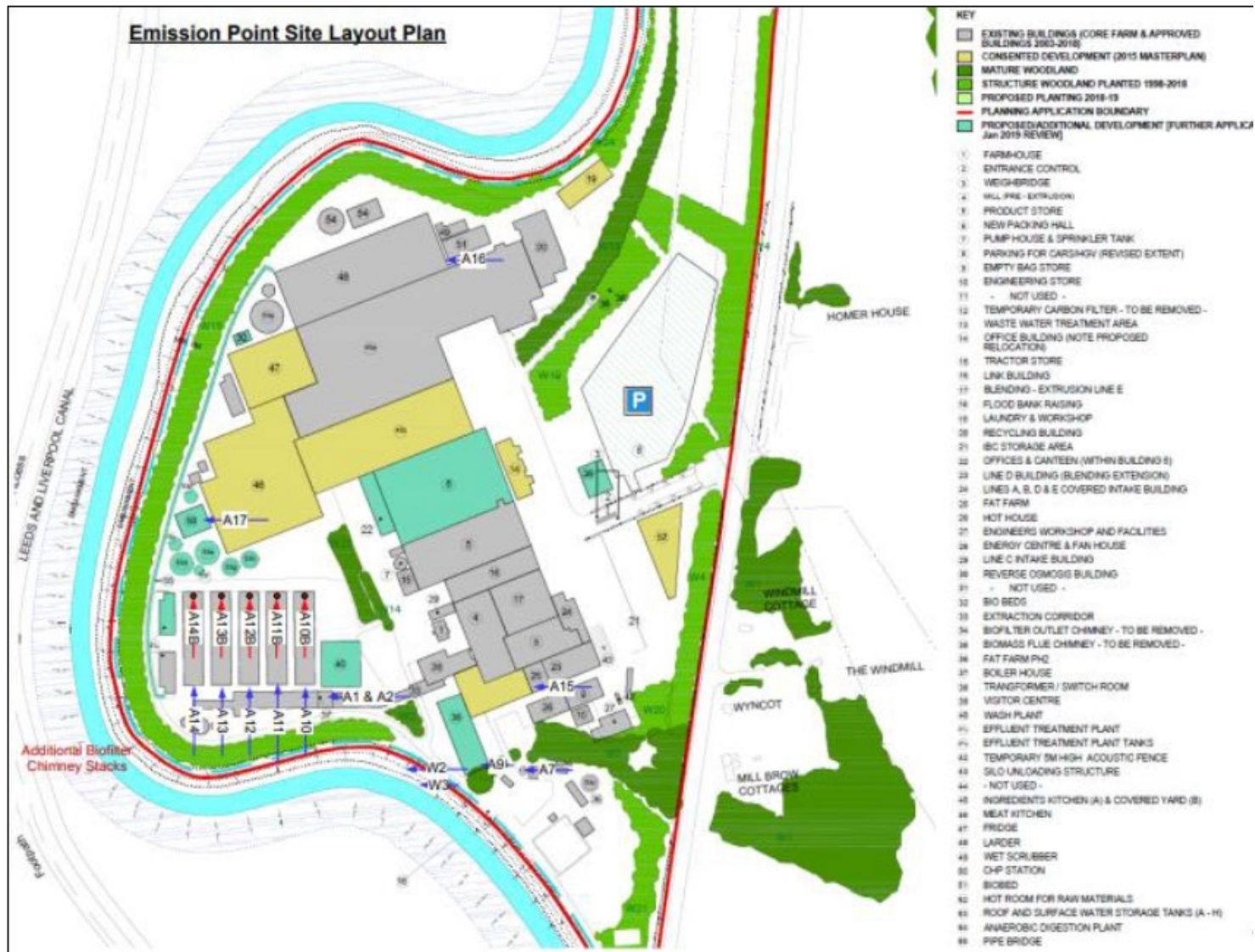
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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