

Review of an Environmental Permit for an Installation subject to Chapter II of the Industrial Emissions Directive under the Environmental Permitting (England & Wales) Regulations 2016 (as amended)

Decision document recording our decision-making process following review of a permit

The Permit number is: EPR/EP3639WV
The Operator is: Pork Farms Limited
The Installation is: Poole Bakery
This Variation Notice number is: EPR/EP3639WV/V003

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication by the European Commission of updated decisions on best available techniques (BAT) Conclusions.

We have reviewed the permit for this installation against the BAT Conclusions for the Food, Drink and Milk Industries published on 4th December 2019 in the Official Journal of the European Union. In this decision document, we set out the reasoning for the consolidated variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and with other permits issued to Installations in this sector. Although the wording of some conditions has changed, while others have been deleted because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the Permit in any way. In this document, we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

We try to explain our decision as accurately, comprehensively and plainly as possible. Achieving all three objectives is not always easy, and we would welcome any feedback as to how we might improve our decision documents in future.

How this document is structured

1. Our decision
2. How we reached our decision
3. The legal framework
4. Annex 1 – Review of operating techniques within the Installation against BAT Conclusions.
5. Annex 2 – Review and assessment of changes that are not part of the BAT Conclusions derived permit review
6. Annex 3 – Improvement Conditions

1 Our decision

We have decided to issue the Variation Notice to the Operator. This will allow the Operator to continue to operate the Installation, subject to the conditions in the Consolidated Variation Notice that updates the whole permit.

We consider that, in reaching our decision, we have taken into account all relevant considerations and legal requirements and that the varied permit will ensure that a high level of protection is provided for the environment and human health.

The Consolidated Variation Notice contains many conditions taken from our standard Environmental Permit template including the relevant annexes. We developed these conditions in consultation with industry, having regard to the legal requirements of the Environmental Permitting Regulations and other relevant legislation. This document does not therefore include an explanation for these standard conditions. Where they are included in the Notice, we have considered the techniques identified by the operator for the operation of their installation, and have accepted that the details are sufficient and satisfactory to make those standard conditions appropriate. This document does, however, provide an explanation of our use of “tailor-made” or installation-specific conditions, or where our Permit template provides two or more options.

2 How we reached our decision

2.1 Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 (a Regulation 61 Notice) on 30/07/2021 requiring the Operator to provide information to demonstrate where the operation of their installation currently meets, or how it will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Notice required that where the revised standards are not currently met, the operator should provide information that:

- describes the techniques that will be implemented before 4 December 2023, which will then ensure that operations meet the revised standards, or
- justifies why standards will not be met by 4 December 2023, and confirmation of the date when the operation of those processes will cease within the Installation or an explanation of why the revised BAT standards are not applicable to those processes, or
- justifies why an alternative technique will achieve the same level of environmental protection equivalent to the revised BAT standards described in the BAT Conclusions.

Where the Operator proposed that they were not intending to meet a BAT standard that also included a BAT Associated Emission Level (BAT-AEL) described in the BAT Conclusions Document, the Regulation 61 Notice required that the Operator make a formal request for derogation from compliance with that BAT-AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 61 Notice response from the Operator was received on 14/11/2021.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review, but not that it necessarily contained all the information we would need to complete that determination.

The Operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 61 Notice response that appears to be confidential in relation to any party.

2.2 Review of our own information in respect to the capability of the Installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous experience in the regulation of the installation we consider that the Operator will be able to comply with the techniques and standards described in the BAT Conclusions other than for those techniques and requirements described in BAT Conclusion 1, 7, and 11. The operator does not currently comply with the requirements of BATc 2, 6, and 9. In relation to these BAT Conclusions, the operator has committed compliance by 4 December 2023. We have therefore included Improvement Conditions IC3 and IC4 in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusions are delivered before 4 December 2023.

2.3 Requests for further information during determination

Although we were able to consider the Regulation 61 Notice response generally satisfactory at receipt, we did in fact need more information in order to complete our permit review assessment and issued a further information request on 07/09/2023 concerning BATcs 1, 4, 5, 6, 7, 8, 9, 11, 12, BAT-AELs for water discharge, 13, 14, BAT-EPL for energy usage, BAT-EPL for wastewater, Medium Combustion Plants (MCPs), air emissions, water emissions, Relevant Hazardous Substance (RHS), cooling towers, product lines, and updated site plan. We have not received a reply from the Operator in respect to this Request for Further Information (RFI). In consequence, we have reissued the RFI on 22/09/2023 with a new deadline. We received a response on 23/11/2023. A copy of the further information request was placed on our public register. In addition, during the meeting had with the Operator on 28/11/2023, supplementary information was provided in relation to BATcs 1, 2, 6(a), 7(a), 9, 11, 29, BAT-AELs, BAT EPLs, MCPs, SCR and RHS. A copy of the points discussed and conclusions reached was placed on our public register.

3 The legal framework

The Consolidated Variation Notice will be issued under Regulations 18 and 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Consolidated Variation Notice, it will ensure that the operation of the Installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

Annex 1: decision checklist regarding relevant BAT Conclusions

BAT Conclusions for the Food, Drink and Milk Industries, were published by the European Commission on 4 December 2019.

There are 37 BAT Conclusions.

BAT 1 – 15 are General BAT Conclusions (Narrative BAT) applicable to all relevant Food, Drink and Milk Installations in scope.

BAT 16 – 37 are sector-specific BAT Conclusions, including Best Available Techniques Associated Emissions Levels (BAT-AELs) and Associated Environmental Performance Levels (BAT-AEPLs):

BAT 16 & 17	BAT Conclusions for Animal Feed
BAT 18 – 20	BAT Conclusions for Brewing
BAT 21 – 23	BAT Conclusions for Dairies
BAT 24	BAT Conclusions for Ethanol Production
BAT 25 & 26	BAT Conclusions for Fish and Shellfish Processing
BAT 27	BAT Conclusions for Fruit and Vegetable Processing
BAT 28	BAT Conclusions for Grain Milling
BAT 29	BAT Conclusions for Meat Processing
BAT 30 – 32	BAT Conclusions for Oilseed Processing and Vegetable Oil Refining
BAT 33	BAT Conclusions for Soft Drinks and Nectar/Fruit Juice Processed from Fruit and Vegetables
BAT 34	BAT Conclusions for Starch Production
BAT 35 – 37	BAT Conclusions for Sugar Manufacturing

This annex provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the Consolidated Variation Notice.

The overall status of compliance with the BAT conclusion is indicated in the table as:

NA – Not Applicable

CC – Currently Compliant

FC – Compliant in the future (within 4 years of publication of BAT Conclusions)

NC – Not Compliant

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
GENERAL BAT CONCLUSIONS (BAT 1-15)			
1	<p>Environmental Management System - Improve overall environmental performance.</p> <p>Implement an EMS that incorporates all the features as described within BATc 1.</p>	CC	<p>The operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 1.</p> <p>A copy of the Environmental Management Systems (EMS) has been provided along with a range of associated and supporting documents.</p> <p>Clarifications on those BATc 1 subpoints have been provided during the meeting had on 28/11/2023 when the Operator declared that compliance is achieved with all points of this BATc. These were not part of a single document but spread across different folders and files. In addition, the Operator stated that the EMS needs to be updated.</p> <p>We consider that the operator will be future compliant with BATc 1. Improvement condition IC3 has been included in the permit to achieve compliance (see Annex 3).</p>
2	<p>EMS Inventory of inputs & outputs. Increase resource efficiency and reduce emissions.</p> <p>Establish, maintain and regularly review (including when a significant change occurs) an inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the features as detailed within the BATCs.</p>	FC	<p>The operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 2.</p> <p>The Operator declared that it has:</p> <ul style="list-style-type: none"> • An inventory of water, energy, raw materials, and wastewater streams • Information about the quality and characteristics of wastewater • Information about energy consumption, materials used, waste

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			<p>generated, and considerations of resource efficiency measures.</p> <p>However, the Operator declared that they do not currently comply with BATc 2 (I), (II), and (VI) but will be compliant by 04/12/2023. Some information in respect to these BATc points exist at company group level but these are not site specific.</p> <p>We consider that the operator will be future compliant with BATc 2 (I), (II), (IV), and (VI). Improvement condition IC3 has been included in the permit to achieve compliance (see Annex 3).</p>
3	<p>Monitoring key process parameters at key locations for emissions to water. For relevant emissions to water as identified by the inventory of waste water streams (see BAT 2), BAT is to monitor key process parameters (e.g. continuous monitoring of waste water flow, pH and temperature) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation).</p>	CC	<p>The operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 3.</p> <p>The Operator declared that is monitoring process wastewater in terms of pH and COD prior to discharge from the on-site ETP to sewer under consent from Wessex Water.</p>
4	<p>Monitoring emissions to water to the required frequencies and standards. BAT is to monitor emissions to water with at least the frequency given [refer to BAT 4 table in BATc] and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.</p>	NA	<p>We are satisfied that BATc 4 is not applicable to this installation.</p> <p>BATc 4 is concerned with monitoring direct discharges to water of process effluent. This installation does not have such discharges as all process effluent is discharged to sewer after initially being treated in the on-site ETP.</p>
5	<p>Monitoring channelled emissions to air to the required frequencies and standards. BAT is to monitor channelled emissions to air with at least the frequency given and in accordance with EN standards.</p>	NA	<p>We are satisfied that BATc 5 is not applicable to this installation.</p>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			This BATc is looking to address dust emissions from grinding or cooling and this site does not use these processes thus, BATc 5 is not applicable.
6	<p>Energy Efficiency</p> <p>In order to increase energy efficiency, BAT is to use an energy efficiency plan (BAT 6a) and an appropriate combination of the common techniques listed in technique 6b within the table in the BATc.</p>	FC	<p>The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 6.</p> <p>The Operator declared that they do not currently comply with BATc 6(a) but will be compliant by 04/12/2023.</p> <p>During the meeting had with the Operator on 28/11/2023, they declared using the following energy efficiency techniques:</p> <ul style="list-style-type: none"> • Burner regulation and control • Energy efficient motors • LED lighting • Process control systems • Reducing compressed air leaks • Variable speed drives • <p>We consider that the operator will be future compliant with BATc 6(a). Improvement condition IC3 has been included in the permit to achieve compliance (see Annex 3).</p>
7	<p>Water and wastewater minimisation</p> <p>In order to reduce water consumption and the volume of waste water discharged, BAT is to use BAT 7a and one or a combination of the techniques b to k given below.</p> <p>(a) water recycling and/or reuse</p> <p>(b) Optimisation of water flow</p> <p>(c) Optimisation of water nozzles and hoses</p> <p>(d) Segregation of water streams</p>	CC	<p>The operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 7.</p> <p>Water and wastewater minimisation techniques used at this site are:</p> <ul style="list-style-type: none"> • Water reuse in jet washing

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
	Techniques related to cleaning operations: (e) Dry cleaning (f) Pigging system for pipes (g) High-pressure cleaning (h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP) (i) Low-pressure foam and/or gel cleaning (j) Optimised design and construction of equipment and process areas (k) Cleaning of equipment as soon as possible		<ul style="list-style-type: none"> • Dry cleaning where possible • Low-pressure foaming • High-pressure cleaning • Cleaning of equipment as soon as possible
8	Prevent or reduce the use of harmful substances In order to prevent or reduce the use of harmful substances, e.g. in cleaning and disinfection, BAT is to use one or a combination of the techniques given below. (a) Proper selection of cleaning chemicals and/or disinfectants (b) Reuse of cleaning chemicals in cleaning-in-place (CIP) (c) Dry cleaning (d) Optimised design and construction of equipment and process areas	CC	The operator has provided information to support compliance with BATc 8. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 8. The Operator declared that it is using dry cleaning as a method of reducing the use of chemical substance.
9	Refrigerants In order to prevent emissions of ozone-depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential.	CC	The operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 9 Gases compliant with this BATc are: <ul style="list-style-type: none"> • Ammonia and glycol – across the factory • CO₂ – new spiral chillers
10	Resource efficiency In order to increase resource efficiency, BAT is to use one or a combination of the techniques given below: (a) Anaerobic digestion (b) Use of residues (c) Separation of residues (d) Recovery and reuse of residues from the pasteuriser (e) Phosphorus recovery as struvite (f) Use of waste water for land spreading	CC	The operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 10. The Operator declared that, as a resource efficiency technique, they are sending all

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement
			sludge from the ETP to be treated off-site in anaerobic digestors.
11	<p>Waste water buffer storage In order to prevent uncontrolled emissions to water, BAT is to provide an appropriate buffer storage capacity for waste water.</p>	CC	<p>The operator has provided information to support compliance with BATc 11. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 11.</p> <p>The Operator declared that it has sufficient buffer storage capacity in addition to manned and/or automated alarm systems to monitor effluent storage, and two slum shut valves are used at the site to prevent the spread of an accidental spillage.</p>
12	<p>Emissions to water – treatment In order to reduce emissions to water, BAT is to use an appropriate combination of the techniques given below. Preliminary, primary and general treatment (a) Equalisation (b) Neutralisation (c) Physical separate (eg screens, sieves, primary settlement tanks etc) Aerobic and/or anaerobic treatment (secondary treatment) (d) Aerobic and/or anaerobic treatment (eg activated sludge, aerobic lagoon etc) (e) Nitrification and/or denitrification (f) Partial nitrification - anaerobic ammonium oxidation Phosphorus recovery and/or removal (g) Phosphorus recovery as struvite (h) Precipitation (i) Enhanced biological phosphorus removal Final solids removal (j) Coagulation and flocculation (k) Sedimentation (l) Filtration (eg sand filtration, microfiltration, ultrafiltration) (m) Flotation</p>	CC	<p>The operator has provided information to support compliance with BATc 12. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 12.</p> <p>The Operator declared that it is using the following water treatment techniques:</p> <ul style="list-style-type: none"> • Screening of solids • Chemical treatment • DAF • Flotation, <p>prior to discharge to sewer via emission point S1 under consent from Wessex Water.</p>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement										
12	<p>Emissions to water – treatment BAT-associated emission levels (BAT-AELs) for direct emissions to a receiving water body</p> <table border="1" data-bbox="280 411 1211 616"> <thead> <tr> <th>Parameter</th> <th>BAT-AEL (°) (°) (daily average)</th> </tr> </thead> <tbody> <tr> <td>Chemical oxygen demand (COD) (°) (°)</td> <td>25-100 mg/l (°)</td> </tr> <tr> <td>Total suspended solids (TSS)</td> <td>4-50 mg/l (°)</td> </tr> <tr> <td>Total nitrogen (TN)</td> <td>2-20 mg/l (°) (°)</td> </tr> <tr> <td>Total phosphorus (TP)</td> <td>0,2-2 mg/l (°)</td> </tr> </tbody> </table>	Parameter	BAT-AEL (°) (°) (daily average)	Chemical oxygen demand (COD) (°) (°)	25-100 mg/l (°)	Total suspended solids (TSS)	4-50 mg/l (°)	Total nitrogen (TN)	2-20 mg/l (°) (°)	Total phosphorus (TP)	0,2-2 mg/l (°)	NA	<p>We are satisfied that BAT-AELs are not applicable to this installation.</p> <p>BAT-AELs are applied for direct emissions to a receiving water body and this installation does not have such discharges. All process water is discharged to sewer after treatment and there are no other discharges to surface waters.</p>
Parameter	BAT-AEL (°) (°) (daily average)												
Chemical oxygen demand (COD) (°) (°)	25-100 mg/l (°)												
Total suspended solids (TSS)	4-50 mg/l (°)												
Total nitrogen (TN)	2-20 mg/l (°) (°)												
Total phosphorus (TP)	0,2-2 mg/l (°)												
13	<p>Noise management plan</p> <p>In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to set up, implement and regularly review a noise management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> - a protocol containing actions and timelines; - a protocol for conducting noise emissions monitoring; - a protocol for response to identified noise events, eg complaints; - a noise reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures. 	NA	<p>We are satisfied that BATc 13 is not applicable to this installation.</p> <p>A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There have been no substantiated noise nuisances from the site therefore an NMP is not a requirement for this site.</p>										
14	<p>Noise management</p> <p>In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to use one or a combination of the techniques given below.</p> <ol style="list-style-type: none"> (a) Appropriate location of equipment and buildings (b) Operational measures (c) Low-noise equipment (d) Noise control equipment (e) Noise abatement 	CC	<p>The operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 14.</p> <p>The Operator declared that it is using the following noise minimisation techniques:</p> <ul style="list-style-type: none"> • Appropriate location of buildings • Noise control equipment • Noise abatement panels in the engineering yard. 										

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement										
			<ul style="list-style-type: none"> Operational measure such as no deliveries taking place at high times. 										
15	<p>Odour Management</p> <p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> - a protocol containing actions and timelines; - a protocol for conducting odour monitoring. - a protocol for response to identified odour incidents eg complaints; - an odour prevention and reduction programme designed to identify the source(s); to measure/estimate odour exposure: to characterise the contributions of the sources; and to implement prevention and/or reduction measures. 	NA	<p>We are satisfied that BATc 15 is not applicable to this Installation.</p> <p>An odour management plan is only required where odour nuisance at sensitive receptors is expected or has been substantiated. There have been no substantiated odour nuisance from the site recently, therefore this BATc is not applicable.</p>										
BAT CONCLUSIONS FOR MEAT PROCESSING													
29	<p>Emissions to air</p> <p>In order to reduce channelled emissions of organic compounds to air from meat smoking, BAT is to use one or a combination of the techniques given below.</p> <table border="1" data-bbox="282 963 1227 1257"> <thead> <tr> <th data-bbox="282 963 551 1011">Technique</th> <th data-bbox="551 963 1227 1011">Description</th> </tr> </thead> <tbody> <tr> <td data-bbox="282 1011 551 1075">(a) Adsorption</td> <td data-bbox="551 1011 1227 1075">Organic compounds are removed from a waste gas stream by retention on a solid surface (typically activated carbon).</td> </tr> <tr> <td data-bbox="282 1075 551 1123">(b) Thermal oxidation</td> <td data-bbox="551 1075 1227 1123">See Section 14.2.</td> </tr> <tr> <td data-bbox="282 1123 551 1187">(c) Wet scrubber</td> <td data-bbox="551 1123 1227 1187">See Section 14.2. An electrostatic precipitator is commonly used as a pretreatment step.</td> </tr> <tr> <td data-bbox="282 1187 551 1251">(d) Use of purified smoke</td> <td data-bbox="551 1187 1227 1251">Smoke generated from purified primary smoke condensates is used to smoke the product in a smoke chamber.</td> </tr> </tbody> </table>	Technique	Description	(a) Adsorption	Organic compounds are removed from a waste gas stream by retention on a solid surface (typically activated carbon).	(b) Thermal oxidation	See Section 14.2.	(c) Wet scrubber	See Section 14.2. An electrostatic precipitator is commonly used as a pretreatment step.	(d) Use of purified smoke	Smoke generated from purified primary smoke condensates is used to smoke the product in a smoke chamber.	NA	<p>We are happy that BATc 29 is not applicable to this installation.</p> <p>This BATc is applicable only where smoke chambers are used, and this site does not carry out this process.</p>
Technique	Description												
(a) Adsorption	Organic compounds are removed from a waste gas stream by retention on a solid surface (typically activated carbon).												
(b) Thermal oxidation	See Section 14.2.												
(c) Wet scrubber	See Section 14.2. An electrostatic precipitator is commonly used as a pretreatment step.												
(d) Use of purified smoke	Smoke generated from purified primary smoke condensates is used to smoke the product in a smoke chamber.												

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement						
AEL	<p>BAT-associated emission level (BAT-AEL) for channelled TVOC emissions to air from a smoke chamber.</p> <p style="text-align: center;">Table 18</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Parameter</th> <th style="width: 20%;">Unit</th> <th style="width: 50%;">BAT-AEL (average over the sampling period)</th> </tr> </thead> <tbody> <tr> <td>TVOC</td> <td>mg/Nm³</td> <td>3-50 (i) (j)</td> </tr> </tbody> </table> <p>(i) The lower end of the range is typically achieved when using adsorption or thermal oxidation. (j) The BAT-AEL does not apply when the TVOC emission load is below 500 g/h.</p>	Parameter	Unit	BAT-AEL (average over the sampling period)	TVOC	mg/Nm ³	3-50 (i) (j)	NA	<p>We are satisfied that this BAT-AEL is not applicable to the site.</p> <p>This BAT-AEL is only applicable to air emissions from smoke chambers and the site does not carry out this process.</p>
Parameter	Unit	BAT-AEL (average over the sampling period)							
TVOC	mg/Nm ³	3-50 (i) (j)							
Meat Processing Sector Environmental Performance Levels									
EPL	<p>Environmental Performance Level – Energy consumption for the meat processing sector</p> <p>General techniques to increase energy efficiency are given in Section 1.3 of the BAT conclusions. The indicative environmental performance level is presented in the table below.</p> <p style="text-align: center;">Table 16</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;">Unit</th> <th style="width: 60%;">Specific energy consumption (yearly average)</th> </tr> </thead> <tbody> <tr> <td>MWh/tonne of raw materials</td> <td>0,25-2,6 (i) (j)</td> </tr> </tbody> </table> <p>(i) The specific energy consumption level does not apply to the production of ready meals and soups. (j) The upper end of the range may not apply in the case of a high percentage of cooked products.</p>	Unit	Specific energy consumption (yearly average)	MWh/tonne of raw materials	0,25-2,6 (i) (j)	NA	<p>We are satisfied that this BAT-EPL for specific energy consumption is not applicable to this installation.</p> <p>This installation produces only ready meals which are excluded from the compliance request with this BAT-EPL, as per Note 1 of Table 16 of the EPL.</p>		
Unit	Specific energy consumption (yearly average)								
MWh/tonne of raw materials	0,25-2,6 (i) (j)								

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement				
EPL	<p>Environmental Performance Level – Specific waste water discharge for the meat processing sector</p> <p>General techniques to reduce water consumption and the volume of waste water discharged are given in Section 1.4 of the BAT conclusions. The indicative environmental performance level is presented in the table below.</p> <p style="text-align: center;">Table 17</p> <table border="1" data-bbox="277 507 1232 596"> <thead> <tr> <th data-bbox="277 507 757 552">Unit</th> <th data-bbox="757 507 1232 552">Specific waste water discharge(yearly average)</th> </tr> </thead> <tbody> <tr> <td data-bbox="277 552 757 596">m³/tonne of raw materials</td> <td data-bbox="757 552 1232 596">1,5-8,0 (*)</td> </tr> </tbody> </table> <p>(*) The specific waste water discharge level does not apply to processes using direct water cooling and to the production of ready meals and soups.</p>	Unit	Specific waste water discharge(yearly average)	m ³ /tonne of raw materials	1,5-8,0 (*)	NA	<p>We are satisfied that BAT-EPL for specific energy consumption is not applicable to this installation.</p> <p>This installation produces only ready meals which are excluded from the compliance request, as per Note 1 of Table 17 in this BATc.</p>
Unit	Specific waste water discharge(yearly average)						
m ³ /tonne of raw materials	1,5-8,0 (*)						

Annex 2: Review and assessment of changes that are not part of the BAT Conclusions derived permit review

Updating permit during permit review consolidation

- Introductory note updated
- Site plan
- Table S1.1 overhaul
 - Activity Reference (AR) renumbering
 - Updated listed activities
 - Addition of production capacity
 - Directly associated activities (DAAs) standardisation

We have updated permit conditions to those in the current generic permit template as a part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

Production/Capacity Threshold

The Environment Agency is looking to draw a “line in the sand” for permitted production capacity; a common understanding between the Operator and regulator for the emissions associated with a (maximum) level of production, whereby the maximum emissions have been demonstrated as causing no significant environmental impact.

We have included a permitted production level (capacity) within table S1.1 of the permit for the section 6.8 listed activity and we need to be confident that the level of emissions associated with this production level have been demonstrated to be acceptable.

The Operator has completed a H1 assessment of emissions for typical figures of production at the time of permitting.

The existing H1 assessment of particulate emissions to air remains valid for the revised capacity threshold now placed within table S1.1 of the permit.

Emissions to Air

We asked the operator to list all emission points to air from the installation in the Regulation 61 notice. And to provide a site plan indicating the locations of all air emission points.

The operator has provided an up-to-date air emission plan.

Implementing the requirements of the Medium Combustion Plant Directive

We asked the Operator to provide information on all combustion plant on site in the Regulation 61 Notice as follows:

- Number of combustion plant (CHP engines, back-up generators, boilers);

- Size of combustion plant – rated thermal input (MWth)
- Date each combustion plant came into operation

The Operator declared during the meeting had on 28/11/2023 that the Reg.61 Response is erroneous and that there are no MCPs present at this site.

Emissions to Water and implementing the requirements of the Water Framework Directive

We asked the Operator to provide information on all emissions to water at the installation in the Regulation 61 Notice as follows;

- Identify any effluents which discharge directly to surface or groundwater;
- Provide an assessment of volume and quality, including results of any monitoring data available;
- and for any discharges to water / soakaway whether a recent assessment of the feasibility of connection to sewer has been carried out.

The operator has previously provided assessments for all emissions to water at the installation. The operator declares there has been no change to activities and subsequent effluents generated at the installation since this risk assessment was taken. Consequently, we agree that the original risk assessments remain valid at this time.

Soil & groundwater risk assessment (baseline report)

The IED requires that the operator of any IED installation using, producing or releasing “relevant hazardous substances” (RHS) shall, having regarded the possibility that they might cause pollution of soil and groundwater, submit a “baseline report” with its permit application. The baseline report is an important reference document in the assessment of contamination that might arise during the operational lifetime of the regulated facility and at cessation of activities. It must enable a quantified comparison to be made between the baseline and the state of the site at surrender.

At the definitive cessation of activities, the Operator has to satisfy us that the necessary measures have been taken so that the site ceases to pose a risk to soil or groundwater, taking into account both the baseline conditions and the site’s current or approved future use. To do this, the Operator has to submit a surrender application to us, which we will not grant unless and until we are satisfied that these requirements have been met.

The Operator declared during the meeting had on 28/11/2023 a Site Condition Report has never been completed for this site but occasional sampling of soil and/or ground water are collected. They have also stated that a Site Protection and Monitoring Plan does not exist for this site.

We have included an Improvement condition in the permit (IC4) which requires the Operator to submit an updated site condition report which includes baseline soil and groundwater data. See Improvement condition(s) in Annex 3 of this decision document.

Climate Change Adaptation

The operator has considered if the site is at risk of impacts from adverse weather (flooding, unavailability of land for land spreading, prolonged dry weather / drought).

The operator has stated that the installation is not likely to be or has previously not been affected by climate change.

Containment

We asked the Operator via the Regulation 61 Notice to provide details of the each above ground tanks which contain potentially polluting liquids at the site, including tanks associated with the effluent treatment process where applicable.

The Operator provided details of all tanks;

- Tank reference/name
- Contents
- Capacity (litres)
- Location
- Construction material(s) of each tank
- The bunding specification including
 - Whether the tank is banded
 - If the bund is shared with other tanks
 - The capacity of the bund
 - The bund capacity as % of tank capacity
 - Construction material of the bund
 - Whether the bund has a drain point
 - Whether any pipes penetrate the bund wall
- Details of overfill prevention
- Drainage arrangements outside of banded areas
- Tank filling/emptying mitigation measures (drips/splashes)
- Leak detection measures
- Details of when last bund integrity test was carried out
- Maintenance measures in place for tank and bund (inspections)
- How the bund is emptied
- Details of tertiary containment

and whether the onsite tanks currently meet the relevant standard in the Ciria “Containment systems for the prevention of pollution (C736)” report.

We reviewed the information provided by the operator. We are not satisfied that the existing tanks and containment measures on site meet the standards set out in CIRIA C736.

We have concerns regarding the secondary containment being used as primary containment, disrepair of surfacing, chemical storage partially stored in intermediate bulk containers (IBS) prone to accidental damages from vehicle fleet operation. In addition, considering the lack of comprehensive information provided as part of the Reg.61 Response, missing site condition report, and relevant hazardous substances stored and used at the site, we consider that an

assessment of the containment measures currently used and their efficiency and efficacy to prevent contamination of the environment in case of accidental spillages or catastrophic loss of containment is required. We have included IC5 to address this situation.

Annex 3: Improvement Conditions

Based on the information in the Operator's Regulation 61 Notice response and our own records of the capability and performance of the installation at this site, we consider that we need to set improvement conditions so that the outcome of the techniques detailed in the BAT Conclusions are achieved by the installation. These improvement conditions are set out below - justifications for them is provided at the relevant section of the decision document (Annex 1 or Annex 2).

Previous improvement conditions marked as complete in the previous permit.

Superseded Improvement Conditions – Removed from permit as marked as “complete”	
Reference	Improvement Condition
IC1	The operator shall carry out a detailed review of the surface water drainage system. The review shall identify any parts of the drainage system that do not pass through the interceptor before leaving the site via emission point W1. The operator shall submit to the Agency for approval a report on the review which includes a programme of works, with timescales, necessary to ensure that all surface water drainage passes through the interceptor before being discharged off-site.
IC2	Following approval of the report submitted under IC1, the operator shall amend the site management systems relating to accident management to ensure they include a procedure to close the outlet of the interceptor in the event of a spillage that enters, or has the potential to enter, the surface water drainage system.

The following improvement conditions have been added to the permit as a result of the variation.

Improvement programme requirements		
Reference	Reason for inclusion	Justification of deadline
IC3	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 1, 2, and 6 were in place on or before 4 December 2023. Refer to BAT Conclusions for a full description of the BAT requirement.	One month from permit issue
IC4	The Operator shall produce a Site Condition Report (SCR) in line with our H5 Guidance. The report shall contain the information necessary to determine the state of soil and groundwater and ensure this is maintained throughout the life of the permit by using the results to better inform the SPMP. The report shall be submitted to the Environment Agency for review.	12 months from permit issue or other date agreed in writing with the Environment Agency

IC5	<p>The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site by a suitably qualified person, and review measures against relevant standard including:</p> <ul style="list-style-type: none"> • CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises, • EEMUA 159 - Above ground flat bottomed storage tanks <p>The operator shall submit a written report to the Environment Agency approval which outlines the results of the survey and the review of standard and provide details of</p> <ul style="list-style-type: none"> • current containment measures • any deficiencies identified in comparison to relevant standards, • improvements proposed • time scale for implementation of improvements. <p>The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.</p>	<p>12 months from permit issue or other date agreed in writing with the Environment Agency</p>
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