

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/BO2323IB
The Operator is: Greencore Grocery Limited
The Installation is: Selby Sauces & Pickles
This Variation Notice number is: EPR/BO2323IB/V007

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 09/06/2022 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 06/10/2022.

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 9. The operator does not currently comply with the requirements of BATc 9. In relation to this/these BAT Conclusion, the Operator has committed compliance by 4 December 2023. We have therefore included Improvement Condition IC14 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 further information requests on 22/09/2023 & 16/10/2023 concerning BATcs 7, 8, 9, 11, EPL for water and energy, containment, cooling towers, product lines, updated site plan. A copy of the further information request was placed on our public register. In addition, we have received from the Operator via email on 20/10/2023 clarifications in respect to MCPs, listed activity, groundwater discharge, buffer capacity, and non-technical description of the site.

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.

This facility produces sauces and pickles and would be classified as a ready meals manufacturer, it could be described under the specific sectors of either vegetable processing or meat processing as it process vegetable and animal raw materials. On review of the sector specific BAT requirements for both vegetable and meat processing it was determined that none of the sector specific BAT would be applicable. Therefore, we have not included either in our considerations in the table below.

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>The operator has an EMS externally accredited to the ISO14001 standard.</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>	CC	<p>The operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 2.</p> <p>The operator has an EMS externally accredited to the ISO14001 standard.</p> <p>The Operator declared:</p> <ul style="list-style-type: none"> • Using a simplified process flow diagram • Provided a description of the process-integrated techniques • Having information about the water consumption in the installation • Volume and characteristics of the wastewater • Monitorisation of waste gas streams and characteristics • Energy consumption, raw materials used, and waste generated monitored to identify efficiency opportunities • Appropriate monitoring strategy to increase efficiency based on BATcs and internal KPIs

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
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 it is monitoring the process effluent daily for pH, flow rate, and pollutant loads, prior to transferring the process effluent the onsite ETP operated by a separate Operator.</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>This BATc is concerned with emissions to water of process effluent and this installation does not have such discharges. The effluent produced it treated in the onsite ETP operated by a different operator, Aqua Operations Limited, under the environmental permit EPR/XP3506LZ. Therefore, we consider that BATc 4 is not applicable to this installation.</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> <p>This installation falls under the production of ready meals and within the meat processing sub sector of the BAT conclusions. The BATc 5 requirements which refer to meat processing are focused on the specific process of smoker chambers which is not applicable to this site. Therefore, we are satisfied BATc 5 is not applicable to this installation.</p>
6	<p>Energy Efficiency</p>	CC	<p>The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are</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
	<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>		<p>satisfied that the operator has demonstrated compliance with BATc 6.</p> <p>The Operator declared that, in addition to having an Energy Efficiency Plan, the following techniques are used:</p> <ul style="list-style-type: none"> • Burner regulation and control • Cogeneration • Heat recovery • LED lighting • Minimisation of boiler blowdown • Economiser installed on boiler 1 • Variable speed drives
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 (b) Optimisation of water flow (c) Optimisation of water nozzles and hoses (d) Segregation of water streams</p> <p>Techniques related to cleaning operations:</p> <p>(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</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>Currently used water and wastewater minimisation techniques at this site are:</p> <ul style="list-style-type: none"> • Recycling water from CIP • Optimisation of water flow • Optimisation of water nozzles and hoses • Segregation of water streams • Dry cleaning where possible • Pigging system for pipes • High pressure cleaning where possible • Optimisation of chemicals used in CIP through an automated system. • Low-pressure foaming • Cleaning of equipment as soon as possible

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
8	<p>Prevent or reduce the use of harmful substances</p> <p>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.</p> <p>(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</p>	CC	<p>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.</p> <p>The Operator declared that it is using the following techniques:</p> <ul style="list-style-type: none"> • Dry cleaning • Optimised design and construction of equipment for new assets where food hygiene allows for modifications. • Proper selection of chemicals.
9	<p>Refrigerants</p> <p>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.</p>	FC	<p>The operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 9.</p> <p>The Operator declared that, apart from the BAT 9 complaint refrigerant R449A used in the Main Chiller Units 1 and 2, and R448A with Dawson Unit, it is also using refrigerant R404A, a gas with high GWP, in three refrigerated trailers, NPD freezer and NPD chiller.</p> <p>The operator does not have an appropriate plan for the replacement of the high ozone depleting refrigerants. Therefore, we have included improvement condition IC14 in the permit to achieve compliance (see Annex 3). We consider that the operator will be future compliant with BATc 9.</p>
10	<p>Resource efficiency</p> <p>In order to increase resource efficiency, BAT is to use one or a combination of the techniques given below:</p> <p>(a) Anaerobic digestion (b) Use of residues (c) Separation of residues</p>	CC	<p>The operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 10.</p>

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
	(d) Recovery and reuse of residues from the pasteuriser (e) Phosphorus recovery as struvite (f) Use of waste water for land spreading		The Operator declared that: <ul style="list-style-type: none"> • Off-site anaerobic digestion is employed for treatment of effluent sludge, beetroot pulp, food and sauce waste. • Use of some residues where the process and food safety considerations allow. • Segregation of residue
11	Waste water buffer storage In order to prevent uncontrolled emissions to water, BAT is to provide an appropriate buffer storage capacity for waste water.	CC	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. The Operator declared that it has 1000m ³ buffer capacity in addition to level monitoring automated alarms. In case of spillages, the material is tinkered off-site, dripped in the ETP, or stored in intermediate bulk containers until a decision is made. There is spill control procedure in addition to spill kits located around the site.
12	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	NA	We are satisfied that BATc 12 is not applicable to this installation. This site is a multi-operator installation, the treatment of the process effluent is carried out by the second Operator in charge of the effluent treatment plant (ETP), Aqua Operations Limited, under the environmental permit EPR/XP3506LZ therefore, BATc12 is not applicable to this facility.

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										
	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		The Operator indicated that all sub-points of BATc12 are employed in the treatment of effluent generated by this installation.										
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="282 762 1211 965"> <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>This BAT is introducing ELVs for process effluent discharge to water and this permit does not have direct discharges to water. All process effluent is sent for treatment to Aqua Operations Limited, the operator of the ETP in this multi-operator installation therefore, BAT-AELs are not applicable to this Operator.</p> <p>However, the Operator clarified that emission point W1 is discharging via interceptor only uncontaminated water runoff from office roofs therefore, the associated parameter, fat oil and grease (FOG), and the monitoring requirement will not be retained in the consolidated permit.</p> <p>Other water emission points namely W2 and W3 discharging uncontaminated surface water via interceptor from the car park (right) and Cardboard Shed respectively, will be introduced in the consolidated permit. Considering the nature and source of these waste streams, we will not be introducing ELVs and monitoring requirements as part of the permit review process.</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 (°)												

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
			Groundwater emission point GW1 has been capped off and is no longer in use. As such, we are removing this emission point from the consolidated permit.
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> <ul 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 using the following noise management technique:</p> <ul style="list-style-type: none"> • Appropriate location of equipment • Operational measures such as closed-doors policy and PPM
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. 	CC	<p>The operator has provided information to support compliance with BATc 15. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 15.</p> <p>The Operator declared that it has an operational OMP and this is included in the</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
	<ul style="list-style-type: none"> - 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. 		<p>permit, having been requested and reviewed by the Agency.</p>

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

Updating permit during permit review consolidation

- Listed activity
- 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.

The listed activity has been changed from:

Section 6.8 Part A1 (d) (ii) - Treating and processing materials intended for the production of food products from vegetable raw materials at a plant with a finished product production capacity of more than 300 tonnes per day (average value on a quarterly basis).

to

Section 6.8 Part A1 (d) (iii) (aa) – Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging)—(iii) animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than—(aa) 75 if A is equal to 10 or more, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.

The Operator confirmed that the products and materials used have not changed from the time of the original permit issue date on 04/04/2006, however, the IPPC regulations 2000 and Environmental Permitting Regulations 2010 which were relevant when the last variation which updated the scheduled activity (V005) was issued did not have a more descriptive activity definition to match the site-specific needs. We have concluded that the listed activity should be updated in line with the Environmental Permitting Regulations 2016 in order to reflect the most appropriate situation at the installation.

The proportion of animal material is up to 51% as percentage of the finish product production capacity.

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 considering that there are no additional emission to air and water.

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.

Table S3.1 has been updated to reflect the emission points as described in the R61 response tool air emissions tab and the updated air emission plan.

Implementing the requirements of the Medium Combustion Plant Directive

Existing small combustion plant (<1MW)

For the existing combustion plant with a rated thermal input less than 1 MW we will not be including any emission limit values or monitoring requirements within the permit, unless any site specific conditions require us to do this.

Existing Medium Combustion Plant (1MW-50MW)

We asked the Operator to provide information on all combustion plants 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 provided the information in the table below:

Boilers

1. Rated thermal input (MW) of the medium combustion plant.	19.2 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine,	Boiler 1: 9.6 MWth Boiler 2: 9.6 MWth

other engine or other medium combustion plant).	
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Natural gas 100% (gas oil used as a back-up fuel in emergencies)
4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018.	January 2000

The Operator declared in the Clarifications Request reply dated 20/10/2023 that, although Boilers 1 and 2 are dual fuel, natural gas and gas oil, these are used solely on natural gas. Monthly tests are carried out to ensure they still fire up on gas oil which is a back-up in case of losing mains gas to the site. We have included reference to the back-up fuel in the consolidated permit.

We have reviewed the information provided and we consider that the declared combustion plant qualify as “existing” medium combustion plant.

For existing medium combustion plant with a rated thermal input greater than 5 MW, the emission limit values set out in tables 2 and 3 of Part 1 of Annex II MCPD shall apply from 1 January 2025.

We have included the appropriate emission limit values for existing medium combustion plant as part of this permit review. See Table S3.1 in the permit. We have also included a new condition 3.1.4 within the permit which specifies the monitoring requirements for the combustion plant in accordance with the MCPD.

As part of the permit review process, we have introduced Improvement Condition IC16 that asks the Operator to develop a methane leak detection and repair programme to establish the methane emissions in the exhaust gas from engines burning biogas and compare these to the manufacturer’s specification.

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 submitted a site condition report (SCR) for this multi-operator installation referenced in the Decision Document of the United Utilities Industrial Limited permit application EPR/CP3135SV drafted during the original application received on 29/03/2005. The file note from 23/06/2006 for EPR/BO2323IB, Greencore Groceries, based on this SCR, asked the Operator to prepare a Site Protection and Monitoring Program. The site condition report included a report on the baseline conditions as required by Article 22. We reviewed that report and considered that it adequately described the condition of the soil and groundwater at that time.

The Operator submitted a summary report which referenced the site condition report and baseline report. We have reviewed the information, and we consider that it adequately describes the current condition of the soil and groundwater. Consequently, we are satisfied that the baseline conditions have not changed.

The Operator declared that it is using a SPMP that is regularly updated.

Hazardous Substances

Hazardous substances are those defined in Article 3 of Regulation (EC) No. 1272/2008 on classification, labelling and packaging of substances and mixtures.

The operator has provided a short risk assessment on the hazardous substances stored and used at the installation. The risk assessment was a stage 1-3 assessment as detailed within EC Commission Guidance 2014/C 136/03.

The stage 1 assessment identified the hazardous substances used / stored on site. The stage 2 assessment identified if hazardous substances are capable of causing pollution. If they are capable of causing pollution, they are then termed Relevant Hazardous Substances (RHS). The Stage 3 assessment identified if pollution prevention measures are fit for purpose in areas where hazardous substances are used / stored. This includes drains as well.

The outcomes of the three-stage assessment identified that pollution of soil and/or ground water to be unlikely.

Climate Change Adaptation

The operator has considered if the site is at risk of impacts from adverse weather including flooding, and prolonged dry weather / drought.

The operator has identified the installation as likely to be or has been affected by flooding and prolonged dry weather/ drought, which we consider to be a severe weather event.

We do not consider the operator to have submitted a suitable climate change adaptation plan for the installation. We have included an improvement condition into the permit (IC15) to request a climate change adaptation plan is submitted by the operator for approval from the Environment Agency.

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 bunded
 - 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 bunded 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 satisfied that the existing tanks and containment measures on site meet the standards set out in CIRIA C736.

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).

We also consider that we need to set improvement conditions relating to changes in the permit not arising from the review of compliance with BAT conclusions. The justifications for these are provided in Annex 5 of this decision document.

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 install continuous conductivity monitoring equipment to the aquifer cooling water circuit at the inlet and outlet points of the plate heat exchanger. The Operator shall submit written confirmation of installation of the equipment to the Agency.
IC2	The Operator shall implement an odour management plan at the installation, having regard to section 2.2.6 of Sector Guidance Note S6.10 (August 2003) and to Horizontal Guidance note H4. A written copy of the plan shall be submitted to the Agency.
IC3	The Operator shall inspect all drains, sub-surface structures, surfacing and containment measures on site, having regard to the requirements of section 2.2.5 of the Agency Guidance Note IPPC S6.10 (August 2003). The Operator shall submit a written report to the Agency which summarises the inspection findings and sets out proposals for any improvements identified together with a timescale for their completion.
IC4	The Operator shall implement a noise management plan at the installation. The noise management plan shall have regard to section 2.9 of Sector Guidance Note S6.10 (August 2003) and Horizontal Guidance note H3. A written copy of the plan shall be submitted to the Agency.
IC5	The Operator shall implement an accounting system for recording all refrigerants use at the installation, having regard to the Agency Guidance Note IPPC S6.10 Section 2.2.4 (August 2003). A written report which summarises the main elements of the accounting system shall be submitted to the Agency.
IC6	The Operator shall implement a programme of regular integrity testing, inspection and maintenance of all liquid storage systems, subsurface structures, secondary and tertiary containment in relation to the potential to cause fugitive emissions to surface water and ground water. The program shall take into account the requirements of section 2.2.5 of the Agency Guidance Note IPPC S6.10 (August 2003). A written report which summarises the main elements of the inspection programme shall be submitted to the Agency.

IC7	<p>The Operator shall install secondary impermeable containment to the following tanks:</p> <ul style="list-style-type: none"> - Waste oil tanks; - Vinegar tank; and - Acetic acid tank. <p>The secondary containment shall have a capacity greater than 110 percent of the largest tank or 25 percent of the total tankage, whichever is the larger, and shall also satisfy the other relevant requirements of section 2.2.5 of Agency guidance Note IPPC S6.10 (August 2003). A written report which confirms that the works have been carried out shall be submitted to the Agency.</p>
IC8	<p>The Operator shall develop a written Site Closure Plan with regard to the requirements set out in Section 2.11 of the Agency Guidance Note IPPC S6.10 (August 2003). A copy of the plan shall be submitted to the Agency.</p>
IC9	<p>The Operator shall assess the options to prevent or minimise pollution arising from the cleaning processes carried out at the installation, having regard to the requirements set out in Section 2.1.11 of the Agency Guidance Note IPPC S6.10 (August 2003). The assessment shall include, but not be limited to the “cleaning in place” infrastructure, the amount of water used and materials lost into the process effluent, and the potential for recovery of cleaning chemicals from process effluents. A written report summarising the findings of the assessment shall be submitted to the Agency and shall include a timescale for the implementation of any improvements identified.</p>
IC10	<p>The Operator shall carry out a review of the refrigerants used at the installation with specific regard to:</p> <ul style="list-style-type: none"> · The use of alternative less environmentally hazardous refrigerants and · Minimising the loss of refrigerants to the environment. The Operator shall submit a written report to the Agency which summarises the findings of the review and which includes proposals for any improvements identified together with a timescale for their completion.
IC11	<p>The Operator shall review the provision of MCERTS accreditation for the monitoring equipment, personnel and organisations employed for the emissions monitoring programme in condition 2.10.1 and propose a timetable for achieving this standard for any elements that are not MCERTS certified.</p>
IC12	<p>The Operator shall review the continued use of land-injection to dispose of process waste against Section 2.6 of the Agency Guidance Note IPPC S6.10 (August 2003). A written report which summarises the findings of the review shall be submitted to the Agency.</p>
IC13	<p>The Operator shall review the waste handling of off-specification food waste and packaging streams. The review shall consider the options for minimising the total quantity of waste which is sent to landfill from the installation. A written report which summarises the findings of the review shall be submitted to the Agency.</p>

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

Improvement programme requirements		
Reference	Reason for inclusion	Justification of deadline
IC14	<p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall develop a replacement plan for the refrigerant system(s) at the installation. This shall be incorporated within the existing environmental management system by the specified date.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible. • An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP. 	One month from permit issue
IC15	<p>The operator shall produce a climate change adaptation plan, which will form part of the EMS. The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> • Details of how the installation has or could be affected by severe weather; • The scale of the impact of severe weather on the operations within the installation; • An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation. <p>The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	12 months from permit issue or other date agreed in writing with the Environment Agency
IC16	<p>The operator shall establish the methane emissions in the exhaust gas from engines burning biogas and compare these to the manufacturer's specification and benchmark levels agreed in writing with the Environment Agency. The operator shall, as part of the methane leak detection and repair (LDAR) programme, develop proposals to assess the potential for methane slip and take corrective actions where emissions above the manufacturer's specification or appropriate benchmark levels are identified.</p>	12 months from permit issue or other date as agreed in writing with the Environment Agency