



Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Smart Systems Limited
Smart Aluminium Extrusions
Arnolds Way
Yatton
North Somerset
BS49 4QN

Variation application number

EPR/KP3434FE/V003

Permit number

EPR/KP3434FE

Smart Aluminium Extrusions Permit number EPR/KP3434FE

Introductory note

This introductory note does not form a part of the notice

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

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

Smart Systems Limited supplies aluminium glazing systems and aluminium extrusions. Over recent years the site has expanded, and this variation is to reflect these changes.

The process

The process consists of the surface treatment and powder coating of aluminium extrusions, generally used for architectural metalwork. The aluminium pieces (profiles) are processed through a series of baths and dried prior to being coated. The processed aluminium pieces are then stored in a warehouse prior to dispatch. Effluent produced from the baths is treated prior to discharge to sewer under authorisation of a trade effluent consent.

The variation is to:

- Add a second vertical powder coating line, a panel coating line, and replace the horizontal coating lines.
- Update the operation of the existing effluent treatment plant and install a further two effluent treatment plants for the extra lines, putting the capacity above threshold and hence adding a new scheduled activity.
- Extend the permit boundary. The installation and operation of the new coating lines has increased the combined capacity of pre-treatment tanks on site and the location requires the extension of the permitted area. The physical boundary and facilities of the site have been expanded to enclose the entire land holding of the business.
- The variation is adding 5 medium combustion plant (MCP) of 1 – 5 MWth thermal input, fired on natural gas. The operator has confirmed these will be used for direct heating only. The plant will therefore be excluded from the MCP directive controls as they do not apply to MCP using the gaseous products of combustion for direct heating, drying and other treatment of materials under Article 2. The opportunity has also been taken to identify all combustion emission sources including those under <1MWth.

The following scheduled activities are authorised under this permit:

- S2.3 Part A(1) (a) - surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30m³;
- S6.4 Part B (a) any process (other than for the re-painting or re-spraying of, or of parts of, aircraft or road or railway vehicles) for applying to a substrate, or drying or curing after such application, printing ink or paint or any other coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of— (i) 20 or more tonnes of printing ink, paint or other coating material which is applied in solid form; and
- S5.4 Part A(1) (a) (ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.

The process consists of the replaced and updated horizontal line; vertical line 1; vertical line 2 and a panel line.

Vertical line 1 consists of 2 main ovens, fully insulated with revolving access & egress doors with a curing temperature between 180 and 200°C; 2 vertical powder coating booths allowing 98% recovery of excess powder particles for reuse; and 13m³ of cascade sump pre-treatment tanks, consisting of aqueous treatment and rinsing, whilst using recovered heat for drying. This plant's maximum capacity is ~500m² per hour of powder coverage, being utilised on common colour lines for maximum production efficiency, with minimised powder waste, whilst maintaining a chrome and near solvent free process. Vertical line 2 is a repeat of vertical line 1.

Supplementing these is a newly installed "panel line", purpose built for the coating of door and inset panels: designed to maximise process efficiency internally and within the coating operations.

Vertical one and the horizontal line continue to use the originally permitted effluent plant, while vertical two and the panel line are serviced by two new dedicated effluent treatment plants. Each effluent plant has an individually monitored and controlled discharge to the site's foul sewer network, combining for discharge to the public foul sewer network under trade effluent consent. The effluent plant process allows the treatment and recycling of wastewater, reducing the usage of fresh / mains water. Solids, chemicals and organic substances from the wastewater are reduced or removed to allow reuse in some circumstances, with the remainder going to foul sewer. All three effluent treatment plants have filter presses that separate the liquids and the solids using pressure filtration. The solids are captured into a 'cake' while the liquid is allowed the flow into a holding tank where the pH is tested to make sure it's within permitted limit before discharge to foul sewer. The effluent plant systems contain pH alarms at 3 different stages; coagulation, neutralisation and final waste tank. Should the final stage sampling detect out of tolerance, or near out of tolerance material, the system will shut off and alarm. It will only restart when the pH is within limit. The system is password protected by senior staff to allow resumption or alteration of parameters.

Water utilised in the process comes, in part, from an extended combined flood attenuation and rainwater harvesting system, with a new total capacity of 3000m³ storage, supported by mains supply.

The main environmental impact from the installation arises from the discharge to foul sewer of treated effluent. The main emission sources to air are from combustion plant and local exhaust ventilation systems. The powder coating activity is carried out in ventilated booths with no external exhaust.

The installation lies within relevant screening distance from the statutorily protected ecological sites:

- Mendip Limestone Grasslands SAC
- Severn Estuary SAC/SPA/Ramsar
- Biddle Street; Tickenham, Nailsea and Kenn Moors and Puxton Moor SSSIs.

The schedules specify the changes made to the permit.

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

Status log of the permit		
Description	Date	Comments
Application EPR/KP3434FE/A001	Duly made 16/09/2011	
Additional information received	02/11/2011	
Permit determined EPR/KP3434FE	14/12/2011	Permit issued to Smart Systems Limited.
Permit variation EPR/KP3434FE/V002	Submitted 21/08/2017	
Permit variation EPR/KP3434FE/V002	Returned 01/09/2017	Incomplete application returned

Status log of the permit		
Description	Date	Comments
Permit variation EPR/KP3434FE/V002	Re-submitted 14/09/2017	
Permit variation EPR/KP3434FE/V002	Withdrawn 14/09/2018	Applicant requested application withdrawn
Permit variation EPR/KP3434FE/V003 (variation and consolidation)	Not duly made 18/10/2021	<p>Application to vary the permit to allow the following changes to:</p> <ul style="list-style-type: none"> - update the operation of the existing effluent treatment plant and install a further two effluent treatment plants for the extra lines, putting the capacity above threshold and hence adding a scheduled activity - add a second vertical powder coating line, a panel coating line, and replace the horizontal coating lines - extend the permit boundary - add MCP. <p>Incomplete application.</p>
Permit variation EPR/KP3434FE/V003	Duly made 06/04/2023	<ul style="list-style-type: none"> • Email confirmation of foul sewer connection to Kings Seymour Water Treatment Plant and estuarial discharge (01/03/2023) • Flood risk assessments (14/03/2023) • Updated site plan with emission points, initial MCP details and MCP App 1 (17/03/2023) • Application fee correction (06/04/2023)
Permit variation EPR/KP3434FE/V003 Schedule 5 request for further information issued	18/04/2023	Request for air quality modelling and assessment.
Permit variation EPR/KP3434FE/V003 Schedule 5 request for further information response	Received 29/09/2023 02/10/2023	Air quality assessment. Air quality modelling files.
Permit variation EPR/KP3434FE/V003 Request for further information	Received 01/12/2023	Confirmation of 3 effluent treatment plant discharge points to Smarts Systems Limited internal foul drainage system prior to combined discharged to Water Undertakers foul sewer.
	Received 06/12/2023	Details on raw materials. Confirmation medium combustion plant are direct heating only.
	Received 13/12/2023	Confirmation cadmium and chromium free process. Confirmation of minimum reporting levels of laboratory results.
Permit determined EPR/KP3434FE/V003	15/01/2024	

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

The Environment Agency in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number

EPR/KP3434FE

Issued to

Smart Systems Limited (“the operator”)

whose registered office is

Arnolds Way

Yatton

North Somerset

BS49 4QN

company registration number 1314601

to operate a regulated facility at

Smart Aluminium Extrusions

Arnolds Way

Yatton

North Somerset

BS49 4QN

to the extent set out in the schedules.

The notice shall take effect from 15/01/2024

Name	Date
Sandra Cavill	15/01/2024

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of the application made by the operator.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number**EPR/KP3434FE**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/KP3434FE/V003 authorising,

Smart Systems Limited (“the operator”),

whose registered office is

Arnolds Way

Yatton

North Somerset

BS49 4QN

company registration number 1314601

to operate an installation at

Smart Aluminium Extrusions

Arnolds Way

Yatton

North Somerset

BS49 4QN

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

Name	Date
Sandra Cavill	15/01/2024

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Energy efficiency

- 1.2.1 The operator shall:
- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
 - (b) review and record at least every four years whether there are suitable opportunities to improve the energy efficiency of the activities; and
 - (c) take any further appropriate measures identified by a review.

1.3 Efficient use of raw materials

- 1.3.1 The operator shall:
- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
 - (b) maintain records of raw materials and water used in the activities;
 - (c) review and record at least every four years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
 - (d) take any further appropriate measures identified by a review.

1.4 Avoidance, recovery and disposal of wastes produced by the activities

- 1.4.1 The operator shall take appropriate measures to ensure that:
- (a) the waste hierarchy referred to in Article 4 of the Waste Framework Directive is applied to the generation of waste by the activities; and
 - (b) any waste generated by the activities is treated in accordance with the waste hierarchy referred to in Article 4 of the Waste Framework Directive; and
 - (c) where disposal is necessary, this is undertaken in a manner which minimises its impact on the environment.

- 1.4.2 The operator shall review and record at least every four years whether changes to those measures should be made and take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the “activities”).
- 2.1.2 Waste authorised by this permit shall be clearly distinguished from any other waste on the site.

2.2 The site

- 2.2.1 The activities shall not extend beyond the site, being the land shown edged in red on the site plan at schedule 7 to this permit.

2.3 Operating techniques

- 2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.
- 2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.
- 2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.
- 2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:
- (a) the nature of the process producing the waste;
 - (b) the composition of the waste;
 - (c) the handling requirements of the waste;
 - (d) the hazardous property associated with the waste, if applicable; and
 - (e) the waste code of the waste.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1 and S3.2.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.

- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil unless such monitoring is based on a systematic appraisal of the risk of contamination.

3.2 Emissions of substances not controlled by emission limits

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

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Environment Agency for approval within the period specified, an odour management plan which identifies and minimises the risks of pollution from odour;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.
- 3.4.2 The operator shall:
- (a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

3.5 Monitoring

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

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.
- 4.1.2 The operator shall keep on site all records, plans and the management system required to be maintained by this permit, unless otherwise agreed in writing by the Environment Agency.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 A report or reports on the performance of the activities over the previous year shall be submitted to the Environment Agency by 31 January (or other date agreed in writing by the Environment Agency) each year. The report(s) shall include as a minimum:
- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
 - (b) the annual production/treatment data set out in schedule 4 table S4.2; and
 - (c) the performance parameters set out in schedule 4 table S4.3 using the forms specified in table S4.4 of that schedule.

- 4.2.3 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4 table S4.1;
 - (b) for the reporting periods specified in schedule 4 table S4.1 and using the forms specified in schedule 4 table S4.4; and
 - (c) giving the information from such results and assessments as may be required by the forms specified in those tables.
- 4.2.4 The operator shall, unless notice under this condition has been served within the preceding four years, submit to the Environment Agency, within six months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

- 4.3.1 In the event:
- (a) that the operation of the activities gives rise to an incident or accident which significantly affects or may significantly affect the environment, the operator must immediately—
 - (i) inform the Environment Agency,
 - (ii) take the measures necessary to limit the environmental consequences of such an incident or accident, and
 - (iii) take the measures necessary to prevent further possible incidents or accidents;
 - (b) of a breach of any permit condition the operator must immediately—
 - (i) inform the Environment Agency, and
 - (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (c) of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment, the operator must immediately suspend the operation of the activities or the relevant part of it until compliance with the permit conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.

- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
- (a) the Environment Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.
- 4.3.6 The Environment Agency shall be given at least 14 days' notice before implementation of any part of the site closure plan.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
- (a) a decision by the Secretary of State not to re-certify the agreement;
 - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
 - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately", in which case it may be provided by telephone.

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	S2.3 A1 (a)	Surface treating metals and plastic materials using an electrolytic or chemical process where the aggregated volume of the treatment vats is more than 30m ³ .	From receipt of raw materials through to the dispatch of product.
AR2	S5.4 A1 (a)(ii)	Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC concerning urban waste-water treatment (ii) physico-chemical treatment.	<p>Treatment of effluent from surface treatment tanks (neutralisation and solids removal) to discharge to foul sewer via three effluent treatment plants.</p> <p>Effluent treatment is in an enclosed building and on an impermeable surface with a sealed drainage system.</p>
AR3	S6.4 B (a) (i)	Applying a coating material as, or in the course of, a manufacturing activity, where the process may result in the release into the air of particulate matter or of any volatile organic compound and is likely to involve the use in any 12-month period of— (i) 20 or more tonnes of printing ink, paint or other coating material which is applied in solid form.	From receipt of raw materials through to the dispatch of product.
Directly Associated Activity			
AR4	Excluded Medium Combustion Plant (direct heating)	<p>Generation of heat in 4 x 1.73MWth input natural gas fired furnaces.</p> <p>Generation of heat in 1 x 1.45MWth input natural gas fired aging oven.</p>	From receipt of natural gas to emissions to air of combustion flue gases.
AR5	Combustion plant (boilers)	Generation of steam in two steam generating gas fired boilers each with a thermal input <1 MWth	From receipt of natural gas to emissions to air of combustion flue gases
AR5	Combustion plant (aging/drying/curing ovens)	Thermal aging/drying/curing using natural gas fired ovens each with a thermal input <1MWth as described in Air Dispersion Modelling Report of combustion gas releases from Smart	Handling of materials to be thermally treated or dried/cured from their receipt to their

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
		Systems Limited (ref SMSL.01.01/ADM), dated Sept 2023.	dispatch to downstream process operations or as finished products. From receipt of natural gas to emission to air of combustion flue gases.
AR6	Raw material storage	Storage of raw materials.	From the receipt of the raw materials to dispatch for use within the facility.

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/KP3434FE/A001	Document 9	Duly made 16/09/2011 (As superseded by variation V003)
Application (variation)	Application and all associated supporting documents	Duly Made 06/04/2023
Response to Schedule 5 Notice dated 18/04/2023	Air quality report provided in response to Schedule 5 Notice. Air quality parameters (as stated within Table 9 of report, (ref. Air Dispersion Modelling Report of Combustion Gas Releases from Smart Systems Limited, dated Sept 2023).	29/09/2023

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
-	-

Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
MCP1 (Furnace 1) ST 41613 66175 MCP2 (Furnace 2) ST 41614 66155 MCP3 (Furnace 3) ST 41621 661136 MCP4 (Aging oven 2) ST 41566 66122 MCP5 (Furnace 5) ST 41643 66126	Excluded medium combustion plant (used for direct heating only)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No limit set	-	-	-
CH10 Phase 2 boiler CH26 Phase 4 boiler (As identified on Site Master Plan with roof extraction points EA107, March 2023)	Combustion of natural gas in boilers	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No limit set	-	-	-
Ovens (As identified on Site Master Plan with roof extraction points)	Combustion of natural gas in aging/drying/curing ovens	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	No limit set	-	-	-

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
EA107, March 2023)						

Table S3.2 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. Unit)	Reference period	Monitoring frequency	Monitoring standard or method
S1 NGR ST 4166 8212 (connection to public foul sewer as shown in Schedule 7)	Three on-site effluent treatment plants (with a combined discharge to foul sewer)	Flow	No limit	Daily	Continuous	
		pH	6-9	Instantaneous	Continuous	BS6068-2.50
		Chemical oxygen demand COD)	No limit	-	Annually	BS6068-2.34
		Trace Metals (Ag, Al, As, Cd, Co, Cr, Cu, Fe, Mn, Mo, Ni, Pb Sb, Se, Tl, V and Zn)	No limit	Average of 24-hour flow proportional composite samples ^{Note 1}	Quarterly in first year of operation, then annually	BS EN 15586:2003
Note 1 - in the case of batch discharge, average values over the release duration taken as flow-proportional composite samples, or, provided that the effluent is appropriately mixed and homogeneous, a spot sample taken before discharge						

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to sewer Parameters as required by condition 3.5.1	S1	Quarterly in first year of operation, then annually	1 January

Table S4.2: Annual production/treatment	
Parameter	Units
Amount of product	Tonnes
Disposal of effluent plant sludge cake	

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Effluent discharge to sewer	Annually	m ³ per tonne of product
Effluent plant sludge cake	Annually	Kg per tonne of product

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Point source emissions to sewer	Emissions to Sewer Reporting Form, or other form as agreed in writing by the Environment Agency	15/01/2024
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	15/01/2024
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	15/01/2024
Performance	Performance Reporting Form, or other form as agreed in writing by the Environment Agency	15/01/2024

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	
Name of operator	
Location of Facility	
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution	
To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	

(b) Notification requirements for the breach of a limit	
To be notified within 24 hours of detection unless otherwise specified below	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the breach of permit conditions not related to limits	
To be notified within 24 hours of detection	
Condition breached	
Date, time and duration of breach	
Details of the permit breach i.e. what happened including impacts observed.	
Measures taken, or intended to be taken, to restore permit compliance.	

(d) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	

Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

“Ag, Al, As, Cd, Co, Cr, Cu, Fe, Mn, Mo, Ni, Pb, Sb, Se, Tl, V, and Zn” mean, silver, aluminium, arsenic, cadmium, cobalt, chromium, copper, iron, manganese, molybdenum, nickel, lead, antimony, selenium, thallium, vanadium and zinc respectively.

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

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

“disposal” means any of the operations provided for in Annex I to the Waste Framework Directive.

“emissions to land” includes emissions to groundwater.

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

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

“groundwater” means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

“Hazardous property” has the meaning in Annex III of the Waste Framework Directive.

“Hazardous waste” has the meaning given in the Hazardous Waste (England and Wales) Regulations 2005.

“Industrial Emissions Directive” means DIRECTIVE 2010/75/EU OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 24 November 2010 on industrial emissions, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“Waste Framework Directive” or “WFD” means Waste Framework Directive 2008/98/EC of the European Parliament and of the Council on waste, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

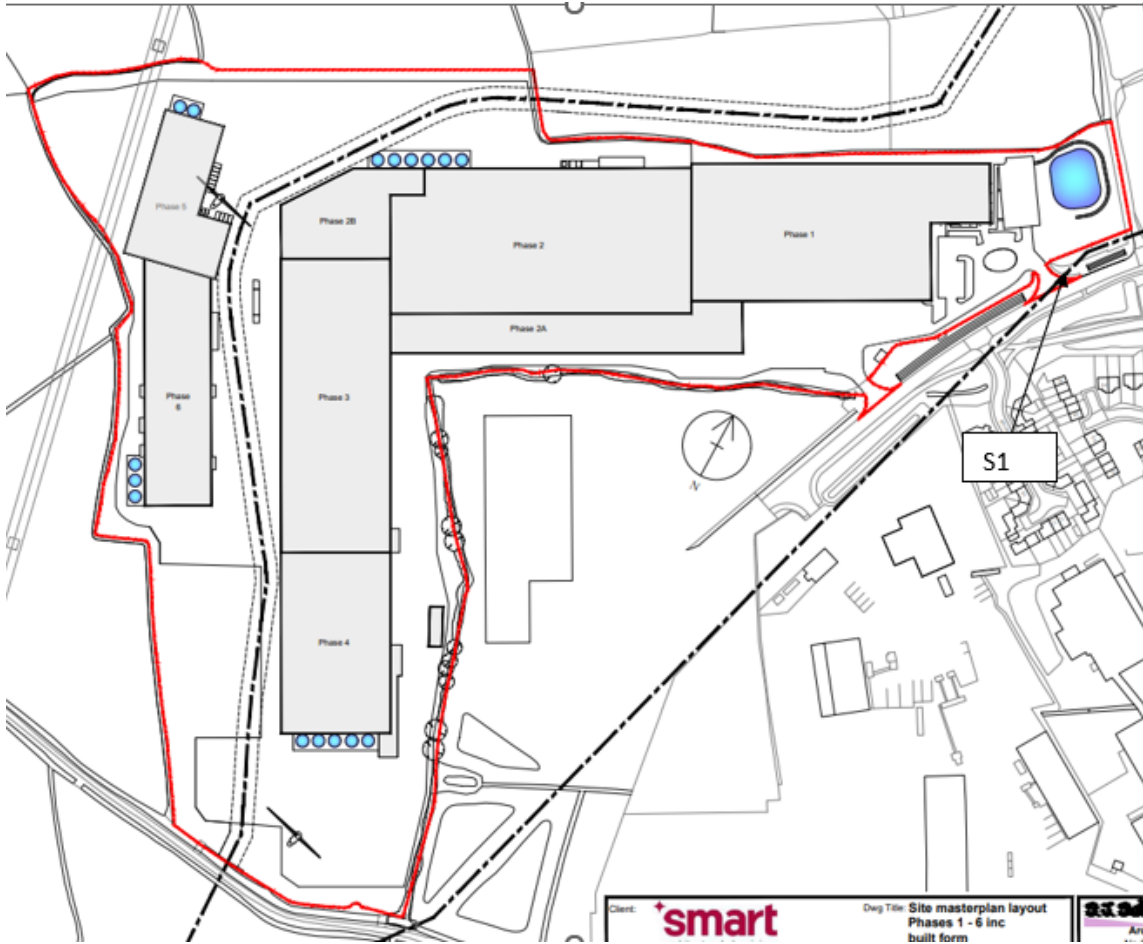
Where a minimum limit is set for any emission parameter, for example pH, reference to exceeding the limit shall mean that the parameter shall not be less than that limit.

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

- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels other than gas engines or gas turbines, 6% dry for solid fuels; and/or

- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels ; and/or
- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content “year” means calendar year ending 31 December.

Schedule 7 – Site plan



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END OF PERMIT