

Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Creative Foods Europe Holdings Limited

Burton Plant
76 Mosley Street
Burton-On-Trent
Staffordshire
DE14 1DS

Variation application number

EPR/CP3105BD/V003

Permit number

EPR/CP3105BD

Burton Plant

Permit number EPR/CP3105BD

Introductory note

This introductory note does not form a part of the notice

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

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

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

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2025.

The schedules specify the changes made to the permit.

The main features of the permit are as follows.

Burton Plant is located in Burton-upon-Trent, Staffordshire and covers approximately 2.8 hectares. This site is accessed from Mosley Street and the central National Grid reference for the site is SK 24276 23115.

There is a mix of land uses/sensitive receptors surrounding the site: to the north is a brewery, depots, a railway and some residential. To the east is a brewery and some residential. To the south is primarily residential. To the west is a railway and station, a depot, a business park, 'works' and some residential. The primary residential areas are to the north, north-west and south. There is an Air Quality Management Zone about 110m to the north-west.

The Environmental Permit is for the following scheduled activity:

6.8 A(1) (d) (iii) (aa) - Treating and processing of materials intended for the production of food products from animal and vegetable raw materials both in combined and separate products, with a finished product production capacity in tonnes per day greater than 75 tonnes per day if A is equal to 10 tonnes or more.

There is also an additional scheduled activity:

5.4 A(1) (a) (ii) - disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day by physico-chemical treatment.

The installation has a production capacity to produce 120 tonnes of finished product per day.

The production process in the main factory includes the preparation and cooking of meat, vegetables, rice, noodles and sauces and the assembly and packaging of ready meals. The production process can be divided into raw material, pre-cook batching and recipe production, cooking and cooling, assembly and sleeving and ancillary operations. The main wastes include food waste, general waste, fat trap waste and cardboard - which is recycled. Process effluent is treated by the on-site Effluent Treat Plant (ETP) prior to being discharged to foul sewer operated by Severn Trent. Uncontaminated surface water is received by the River Trent.

The main releases to air are combustion gases from the onsite combustion plants. The site utilises two 5.7 MWth natural gas fired boilers. These boilers are used to produce steam, for direct process use and factory space heating. There is also an additional combined heat power (CHP) 1.877 MWth combustion plant which is fired through natural gas.

The site is located within several inner source protection zones (Zone 1). It's within 125m of five potable water supply boreholes one of which is within 20m. The underlying Mercia Mudstone bedrock is not designated as an aquifer. The overlying Superficial Deposit is designated as a high vulnerability Secondary aquifer. The site is within a nitrate vulnerable zone. The closest surface water feature is Shobnall Brook about 125m to the south-west of the site. This is where the brook appears at the head of a culvert by the railway so it is not known if the brook runs in the culvert under or closer to the site. Peel's Cut is about 940m to the south-east and linked to the River Trent which is about 1.1km to the east. The Trent and Mersey Canal lies approximately 1km to the west. The site is at low risk of flooding from rivers.

There is one designated statutory site within 10km of the site which is the River Mease Special Area of Conservation (SAC) and the nearest point of the SAC is located approximately 9.6km south-west from the site. There are several non-statutory sites within 2km of the installation: two Local Nature Reserves, eight Local Wildlife Sites and three Ancient Woodlands.

The site has an internal Environmental Management System (EMS) which is audited through a scheduled internal audit process which takes place continuously.

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

Status log of the permit		
Description	Date	Comments
Application received EPR/CP3105BD/A001	27/08/2004	Application received for the treatment and processing of ready meals.
Request for further information – landspreading certification	25/11/2004	Response received 26/11/2004 and 09/12/2004.
Request for further information – historical polluting substances	26/11/2004	Response received 27/11/2004.
Request for further information – trace contaminants	30/11/2004	Response received 06/12/2004.
Request for further information – oven size and fuel type	02/12/2004, 03/12/2004	Response received 02/12/2004 and 03/12/2004.
Permit determined EPR/BO5314IU	24/12/2004	Permit issued to Kerry Foods Limited.
Application BO5314IU/V002(variation and consolidation)	Duly made 28/08/2019	Application to vary and update the permit to modern conditions. Addition of one 1.877MWth input gas fired engine (MCP and SG).
Response to request for further information.	28/08/2019	Revised site plan, M5 stack emission monitoring, revised H1, boilers-CHP operational configuration.
Variation determined EPR/BO5314IU	19/09/2019	Varied permit issued.
Application EPR/CP3105BD/T001 (full transfer of permit EPR/ BO5314IU)	Duly made 18/11/2019	Application to transfer the permit in full to Creative Foods Europe Holdings Limited.
Transfer determined EPR/CP3105BD	05/12/2019	Full transfer of permit complete.
Application CP3105BD/V002 (variation and consolidation)	Duly made 09/01/2020	Application for a change in listed activity to allow new products, a new effluent treatment plant and changes to raw material storage and packaging DAAs.

Status log of the permit		
Description	Date	Comments
Additional information submitted	26/03/2020	Email confirming refrigeration changing from ammonia to CO ₂ .
Additional information submitted	30/07/2020	Email containing revised risk assessment RA-22110-20-123 Rev B, July 2020
Variation determined CP3105BD/V002	19/08/2020	Permit issued to Creative Foods Europe Holdings Limited
Application EPR/CP3105BD/V003 (variation and consolidation)	Regulation 61 Notice response received 23/01/2023	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Additional information received	09/04/2024	Information requested in relation to Reg.61 response tool concerning BATc 1, 2, 3, 6, 8, 9, 11, 27, 27 EPL for specific energy consumption, 27 EPL for specific waste water discharge, capacity threshold, emissions to Air, Soil & groundwater risk assessment, Hazardous Substances.
Additional information received	22/04/2024	Further information requested in relation to BATc 6, 27, 27 EPL for specific energy consumption, 27 EPL for specific waste water discharge.
Variation determined and consolidation issued EPR/CP3105BD (Billing ref. CP3304BJ)	22/05/2024	Varied and consolidated permit issued in modern format.

End of introductory note

Notice of variation and consolidation

The Environmental Permitting (England and Wales) Regulations 2016

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

Permit number

EPR/CP3105BD

Issued to

Creative Foods Europe Holdings Limited (“the operator”)

whose registered office is

**76 Mosley Street
Burton-On-Trent
Staffordshire
DE14 1DS**

company registration number 08493072

to operate a regulated facility at

**Burton Plant
76 Mosley Street
Burton-On-Trent
Staffordshire
DE14 1DS**

to the extent set out in the schedules.

The notice shall take effect from 22/05/2024.

Name	Date
Stuart Miller	22/05/2024

Authorised on behalf of the Environment Agency

Schedule 1

All conditions have been varied by the consolidated permit as a result of an Environment Agency initiated variation.

Schedule 2 – consolidated permit

Consolidated permit issued as a separate document.

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/CP3105BD

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/CP3105BD/V003 authorising,

Creative Foods Europe Holdings Limited (“the operator”),

whose registered office is

**76 Mosley Street
Burton-On-Trent
Staffordshire
DE14 1DS**

company registration number 08493072

to operate an installation at

**Burton Plant
76 Mosley Street
Burton-On-Trent
Staffordshire
DE14 1DS**

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

Name	Date
Stuart Miller	22/05/2024

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”).

2.2 The site

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

2.3 Operating techniques

2.3.1 The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Environment Agency.

2.3.2 If notified by the Environment Agency that the activities are giving rise to pollution, the operator shall submit to the Environment Agency for approval within the period specified, a revision of any plan or other documentation (“plan”) specified in schedule 1, table S1.2 or otherwise required under this permit which identifies and minimises the risks of pollution relevant to that plan, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Environment Agency.

2.3.3 Any raw materials or fuels listed in schedule 2 table S2.1 shall conform to the specifications set out in that table.

2.3.4 The operator shall ensure that where waste produced by the activities is sent to a relevant waste operation, that operation is provided with the following information, prior to the receipt of the waste:

- (a) the nature of the process producing the waste;
- (b) the composition of the waste;
- (c) the handling requirements of the waste;
- (d) the hazardous property associated with the waste, if applicable; and
- (e) the waste code of the waste.

2.4 Improvement programme

2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

2.4.2 Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 3 tables S3.1, S3.2 and S3.3.

3.1.2 The limits given in schedule 3 shall not be exceeded.

- 3.1.3 Periodic monitoring shall be carried out at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.
- 3.1.4 For the following activities referenced in schedule 1, table S1.1 AR3 (boiler 1 & 2) the first monitoring measurements shall be carried out within four months of 01/01/2025 or of the date when the MCP is first put into operation, whichever is later.

3.2 Emissions of substances not controlled by emission limits

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

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- 3.3.2 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, S3.2 and S3.3.
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.
- 3.5.4 Permanent means of access shall be provided to enable sampling/monitoring to be carried out in relation to the emission points specified in schedule 3 tables S3.1, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

3.6 Pests

- 3.6.1 The activities shall not give rise to the presence of pests which are likely to cause pollution, hazard or annoyance outside the boundary of the site. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved pests management plan, have been taken to prevent or where that is not practicable, to minimise the presence of pests on the site.
- 3.6.2 The operator shall:
- (a) if notified by the Environment Agency, submit to the Environment Agency for approval within the period specified, a pests management plan which identifies and minimises risks of pollution from pests;
 - (b) implement the pests management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

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

4.2 Reporting

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

4.3 Notifications

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

relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.

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

Where the operator is a registered company:

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

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

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

In any other case:

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

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

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

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

4.4 Interpretation

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

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

Schedule 1 – Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR1	Section 6.8 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 75 tonnes per day greater than: aa) 75 if A is equal to 10 or more	From receipt of raw materials such as meat and vegetable goods delivered to the site to the despatch of ready meals and other products Production capacity is limited to 120 tonnes per day
AR2	Section 5.4 Part A1 (a) (ii)	Physico-chemical Treatment of non-hazardous waste waters in a facility with a capacity of more than 50 tonnes per day by dissolved air flotation (DAF)	Operation of the Effluent Treatment Plant (ETP) for the control of releases to sewer. Collection and treatment of process effluent prior to discharge to sewer. Daily volume of daily treated effluent discharge is 240m ³
Directly Associated Activity			
AR3	Steam supply	Two 5.7 MWth natural gas fired boilers	From receipt of natural gas to release of combustion products to air to production of steam and associated wastes removed from site. Only one boiler is to be operational at any one time
AR4	Electricity supply	One 1.877 MWth natural gas fired combined heat power engine	From receipt of natural gas to release of combustion products to air to production of heat and electricity and associated wastes removed from site. Annual operating hours not restricted
AR5	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to despatch of final product

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
AR6	Use of refrigerants	Use of refrigerants in cooling, chilling and/or freezing systems at the installation	From receipt of raw materials to despatch of final product
AR7	Storage and use of chemicals and oils	Storage and use of chemicals and oils at the installation	From receipt of chemicals and oils to disposal of wastes arising
AR8	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery
AR9	Process cooling waters	Operation of two cooling towers	From operation of cooling towers, including chemical dosing
AR10	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system

Table S1.2 Operating techniques		
Description	Parts	Date Received
Application EPR/BO5314IU/A001	The response to questions 2.1 and 2.2 given in Sections 2.1 and 2.2 of the application	27/08/2004
Application EPR/BO5314IU/V002	Application Part C3 Q3a: Technical Standards. Kerry Foods Limited Environmental Risk Assessment for Application to Vary Permit BO5314IU at Burton Food Products Plant No1	28/05/2019
Additional information	Response to further information request ref: JER1523, August 2019	28/08/2019
Variation Application EPR/CP3105BD/V002	Application Part C3 Q3a: Technical Standards	09/01/2020
Application documents	BAT assessment - Food, drink and milk industries Document ref: Attachment C3.2	09/01/2020
	Odour management plan. Document ref: Attachment C3.4	09/01/2020
	CO2 refrigeration details email	26/03/2020
Additional Information	Revised risk assessment – document reference RA-22110-20-123 REV B	30/07/2020
Regulation 61 (1) Notice – Responses to questions dated 02/08/2022	All parts	Received 23/01/2023
Request for further information dated 07/02/2024	Information requested in relation to Reg.61 response tool concerning BATc 1, 2, 3, 6, 8, 9, 11, 27, 27 EPL for specific energy consumption, 27 EPL for specific waste water discharge, capacity threshold, emissions to Air, Soil & groundwater risk assessment, Hazardous Substances	Received 09/04/2024

Table S1.2 Operating techniques		
Description	Parts	Date Received
Request for further information dated 16/04/2024	Further information requested in relation to BATc 6, 27, 27 EPL for specific energy consumption, 27 EPL for specific waste water discharge	Received 22/04/2024

Table S1.3 Improvement programme requirements		
Reference	Requirement	Date
IC12	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 22/05/2025
IC13	The Operator shall produce a monitoring plan detailing how the management of relevant hazardous substances which did not screen out as low risk, based on the RHS baseline assessment, will be maintained and monitored to mitigate the risks of pollution. The plan shall be submitted for approval. The plan shall be implemented in accordance with the Environment Agency's written approval, including timescales to undertake any infrastructure improvements.	12 months from permit issue 22/05/2025
IC14	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: <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. The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.	12 months from permit issue 22/05/2025

Schedule 2 – Waste types, raw materials and fuels

Table S2.1 Raw materials and fuels	
Raw materials and fuel description	Specification
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Schedule 3 – Emissions and monitoring

Table S3.1 Point source emissions to air – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
A1 [Point A1 on site plan in Schedule 7]	Boiler Plant 1 1 x 5.7 MWth Natural gas fired boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No Limit	Periodic	Every three years	MCERTS BS EN15058
A2 [Point A2 on site plan in Schedule 7]	Boiler Plant 2 1 x 5.7 MWth Natural gas fired boiler	Oxides of Nitrogen (NO and NO ₂ expressed as NO _x)	200 mg/m ³ [Note 1]	Periodic	Every three years	BS EN 14792
		Carbon monoxide	No Limit	Periodic	Every three years	MCERTS BS EN15058
A3	Emergency relief valve - Boiler No.1	No parameters set	No limit set	--	--	--
A4	Emergency relief valve - Boiler No.2	No parameters set	No limit set	--	--	--
A5	Char-grill oven	Odour	No limit set	--	--	--
		VOCs				
A6	Echo Oven	NO _x	No limit set	--	--	--
		SO _x				
		CO				
A7	Echo Oven	NO _x	No limit set	--	--	--
		SO _x				
		CO				
A8a	Rack Oven	NO _x	No limit set	--	--	--
		SO _x				
		CO				
A8b	Rack Oven	NO _x	No limit set	--	--	--
		SO _x				
		CO				
A9	Filtered product extract flue	No parameters set	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
A10	Echo/Rack product extract flue	No parameters set	No limit set	--	--	--
A11 [Point A11 on site plan in Schedule 7]	1 x 1.877 MWth Natural gas spark ignition engine (MCP and SG) ^[Note 2]	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	190mg/m ³	Hourly Average	Every three years	As agreed in writing by the Environment Agency
		Carbon monoxide	No limit set			
<p>Note 1: The emission monitoring/limits requirements apply from 1 January 2025, unless otherwise advised by the Environment Agency and/or if one or both boilers is replaced.</p> <p>Note 3: Monitoring requirements are defined at a temperature of 273.15K, a pressure of 101.3kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 15% for engines.</p>						

Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements						
Emission point ref. & location	Source	Parameter	Limit (incl. unit)	Reference Period	Monitoring frequency	Monitoring standard or method
W1 [Point W1 on site plan in schedule 7] emission to River Trent	Uncontaminated surface runoff	No parameter set	No limit set	--	--	--
W2 [Point W2 on site plan in schedule 7] emission to River Trent						
W3 [Point W3 on site plan in schedule 7] emission to River Trent						

Table S3.3 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 [Point S1 on site plan in schedule 7] emission to Severn Trent Foul sewer	Treated process effluent from onsite effluent treatment plant	No Parameters Set	--	--	Monthly	UKAS
S2 [Point S2 on site plan in schedule 7] emission to Severn Trent foul sewer						

Schedule 4 – Reporting

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

Table S4.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Point source emissions to air Parameters as required by condition 3.5.1	A1 & A2	First monitoring undertaken in accordance with Condition 3.1.4 to be reported within 3 months, and then every 3 years thereafter.	From first monitoring requirements in accordance with Condition 3.1.4
	A11	Every 3 years	1 January
Point source emissions to sewer Parameters as required by condition 3.5.1	S1 & S2	Every 12 months	1 January

Table S4.2: Annual production/treatment	
Parameter	Units
Production of Kitchen and sauce packs	tonnes
Production of protein cooking	tonnes
Production of sandwich fillings and salads	tonnes

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Total raw material used	Annually	tonnes
Waste	Annually	tonnes
COD loss efficiency	Annually*	COD te/te product
Refrigerant Consumption	Annually	kg
Total mass release of oxides of nitrogen as NO ₂	Annually	tonnes
Food waste	Annually	Tonnes

*COD loss efficiency to be calculated on a weekly frequency, reported annually

Table S4.4 Reporting forms		
Parameter	Reporting form	Form version number and date
Point source emissions to air	Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Point source emissions to sewer	Emissions to Sewer Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Water usage	Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Energy usage	Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021
Food Waste	Food waste Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1 06/02/2023
Other performance parameters	Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency	Version 1, 08/03/2021

Schedule 5 – Notification

These pages outline the information that the operator must provide.

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

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

Part A

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

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

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

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

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

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

Part B – to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

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

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

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

“combined heat and power” (CHP) or Cogeneration means the simultaneous generation in one process of thermal energy and electrical or mechanical energy.

“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.

“first put into operation” means when fuel is first combusted in the MCP. The plant must have been fired with its design fuel up to its full load. This can be, but does not have to be, during commissioning.

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

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

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

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

“Medium Combustion Plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW. An “existing medium combustion plant” is combustion plant operating before 20 December 2018.

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

“Pests” means Birds, Vermin and Insects.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

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

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

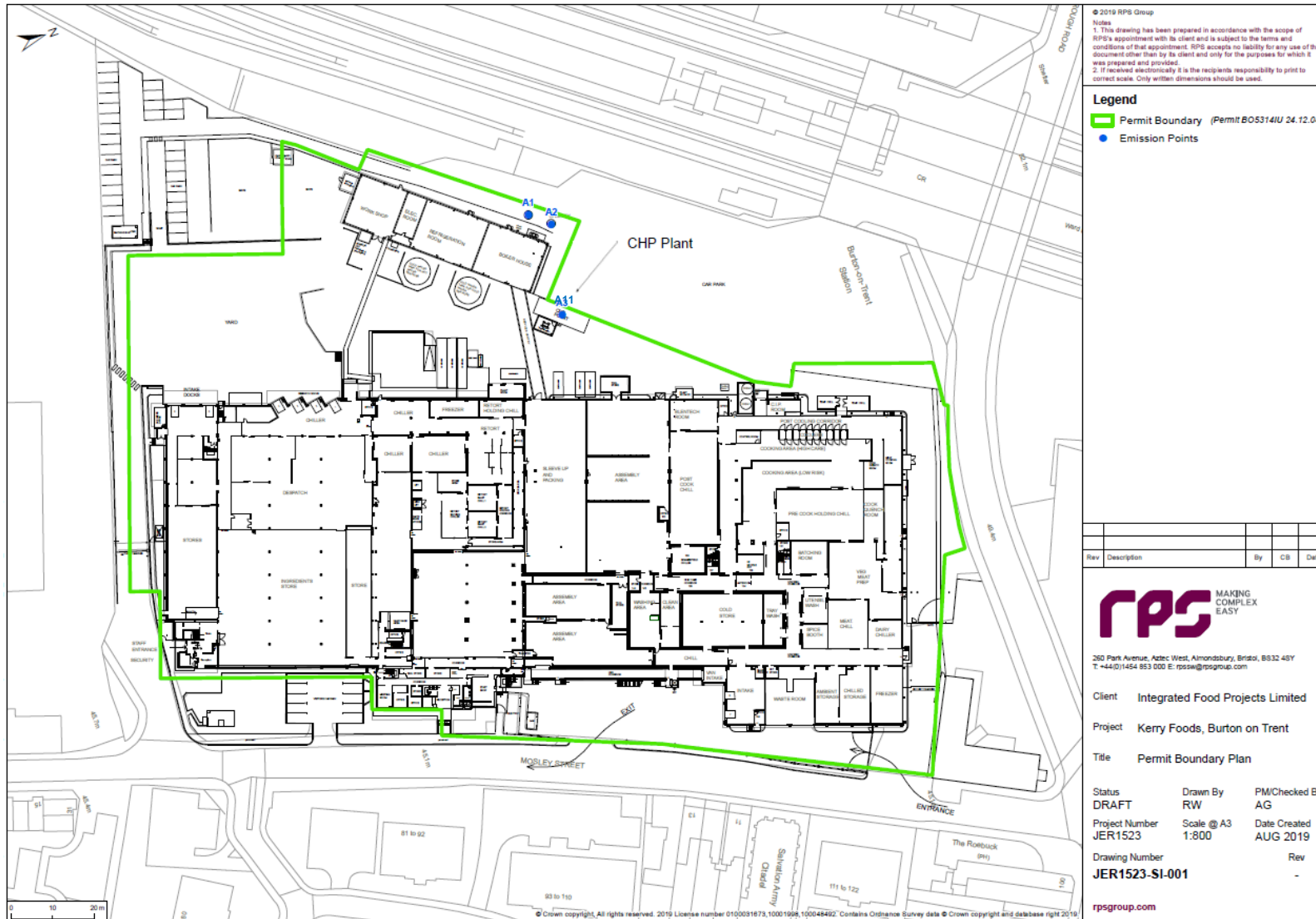
- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or
- in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 15% dry for liquid and gaseous fuels ; and/or

- in relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3 kPa, with no correction for water vapour content

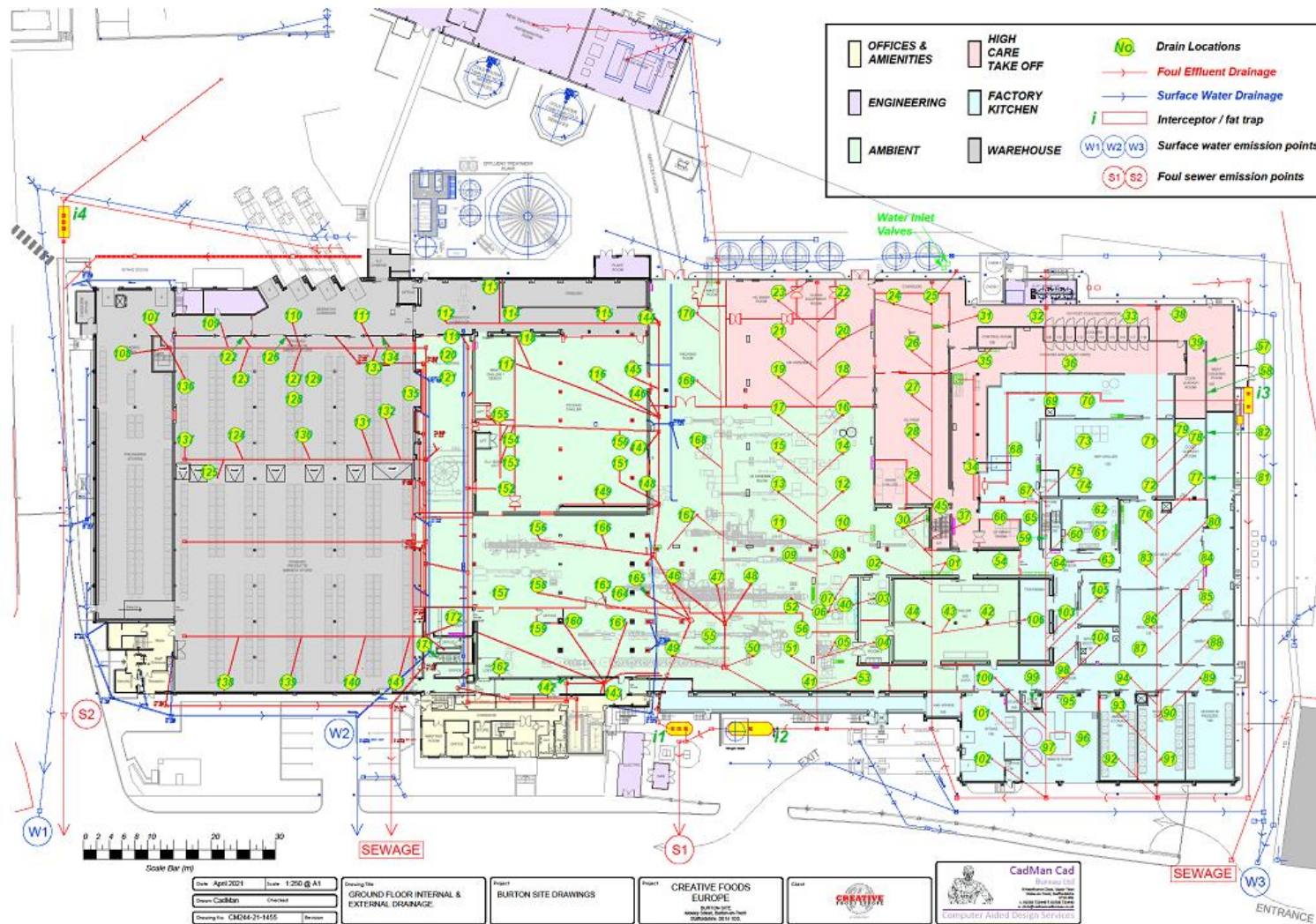
“year” means calendar year ending 31 December.

Schedule 7 – Site plan

i) Site plan showing MCP emission points:



ii) Site plan showing surface run off and sewer emission points with effluent flow:



END OF PERMIT