Permitting Decisions- Variation

We have decided to grant the variation for ABP Doncaster operated by Anglo Beef Processors Ltd.

The variation number is EPR/BP3530BD/V004.

We have also carried out an Environment Agency initiated variation to the permit, referenced as EPR/BP3530BD/V003. We have updated some of the permit conditions following a statutory review of the permits in the Food, Drink & Milk industry sector.

Changes introduced by this variation made by the operator (V004)

The permit has been varied to allow the following change on site:

The introduction of a back- up generator and accompanying fuel tank, the generator will only be used in emergency situations in the event of mains supply power failure. The generator has a thermal input of 1.76 MWth and will run on diesel fuel with a low sulphur content (<0.1%wt). The fuel tank is double skinned with a high-level gauges to prevent over filling.

Changes introduced by this variation notice/statutory review (V003)

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

We have implemented the requirements of the Medium Combustion Plant directive and incorporated post-dated requirements for 2030 for the existing back-up boiler the main boiler is already subject to the requirements of the Medium Combustion Plant directive

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

This decision document provides a record of the decision-making process. It

1) highlights key issues in the determination

2) summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account

Points 1 and 2 relate to those aspects of the variation which have been applied for by the Operator (EPR/ FP3037PA /V012), and are contained within Part 1 of this decision document

3) explains why we have also made an Environment Agency initiated variation

Point 3 relates to our statutory Food, Drink and Milk review of the permit (EPR/ FP3037PA /V010) and is described in Part 2 of this decision document

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

Read the permitting decisions in conjunction with the environmental permit and the variation notice.

Key issues of the decision

Air emissions

The variation applied for by the Operator is to install a new back-up generator which will provide power to the site should there be an interruption of mains power supply or failure. The generator will operate on low-sulphur (<0.1% wt) gasoil (diesel). The generator will not operate in conjunction with other combustion processes onsite. A new emission point (A3) associated with the generator has been added to the permit.

The main emissions from the installation are to air in the form of nitrogen dioxide (NO_2), carbon monoxide (CO), and sulphur dioxide (SO_2). We have included a condition in the permit restricting the fuel to ultra-low sulphur gasoil.

The H1 assessment demonstrates that for human health

- short-term emissions of NO_2 screen out as insignificant at stage 1 of the assessment – the short-term process contribution (PCST) < 10% of the relevant environmental standard (ES) (1.72%).

- long-term emissions of NO_2 did not screen out at stage 1 (19.46% of the ES), but when background concentrations are taken into account at the second stage of the screening, the long-term predicted environmental concentration (PECLT) is < 70% of the ES (1.91%). Long-term emissions are therefore unlikely to give rise to significant pollution and no further assessment is required

- Short-term emissions of Sulphur Dioxide (SO_x) screen out as insignificant at stage 1 of the assessment – the short-term process contribution (PCST) < 10% of the relevant environmental standard (ES) (0.53%).

The results from the H1 assessment indicated that for habitats:

Hatfield Moor SAC (Special Areas of Conservation) and Thorne & Hatfield Moor SPA (Special Protection Areas) are located approximately 4,054m and 4,285m respectively east of site at its closest point. There are also six local wildlife sites within relevant screening distances, the closest being New Close Wood approximately 488m south of the site.

- short-term emissions of NO_2 screen out as insignificant at stage 1 of the assessment – the short-term process contribution (PCST) < 10% of the relevant environmental standard (ES) (2.71%).

- long-term emissions of NO_2 did not screen out at stage 1 (25.95% of the long-term ES), but when background concentrations are taken into account at the second stage of the screening, the long-term predicted environmental concentration (PECLT) is < 70% of the ES (3.70%). Long-term emissions are therefore unlikely to give rise to significant pollution and no further assessment is required.

Based on the assessment of the H1 assessment, we are confident that the emissions from the backup generator are unlikely to cause significant impact on the surrounding air quality.

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has been made.
The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’, Appendix 2 of RGN2 ‘Defining the scope of the installation’, Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.

The site

The operator has provided a plan which we consider to be satisfactory.
The plan is included in the permit.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

- Hatfield Moor SAC (Special Areas of Conservation); and
- Thorne & Hatfield Moor SPA (Special Protection Areas).

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.
We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator’s risk assessment is satisfactory.

General operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.
The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Operating techniques for emissions that screen out as insignificant

Emissions of nitrogen oxide and sulphur dioxide have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.
We consider that the emission limits included in the installation permit reflect the BAT for the sector.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Changes to the permit conditions due to an Environment Agency initiated variation

We have varied the permit as part of the Food, Drink & Milk Permit Review.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

As part of the Food, Drink & Milk Permit review we have included the following improvement conditions (IC); IC4 to meet the requirements of BATc 6, IC5 to meet the requirements of BATc 9, IC6 to undertake a RHS assessment, IC8 to undertake an assessment of the onsite containment, IC9 to review the feasibility of installing an effluent treatment plant, as per the requirements of BATc 12 and IC10 to provide a climate change adaptation plan.

See Annex 3 below for further details.

Emission limits

We have implemented MCPD limits for emissions of Oxides of nitrogen (NO and NO_2 expressed as NO_2) of 200 mg/Nm^3 for the backup generator (emission point A3). The limits are only applicable if the generator is operated for more than 500 hours a year

In addition, we have taken this opportunity to include the MCPD limits for emissions of Oxides of nitrogen (NO and NO_2 expressed as NO_2) of 250 mg/Nm^3 for the existing boilers (Boilers 1 & 2, emission point A1 and A2). The limits shall come into effect from 01/01/2030 unless the boilers are replaced.

Monitoring

We have decided that monitoring should be added for the emissions of Oxides of nitrogen (NO and NO_2 expressed as NO_2) from the back generator as per the MCPD. Monitoring is only required if the generator is operated for more than 500 hours a year.

In addition, we have included monitoring requirements for emissions of Oxides of nitrogen (NO and NO_2 expressed as NO_2) for the existing boilers (Boilers 1 & 2, emission points A1 and A2). The monitoring requirements shall come into effect from 01/01/2030 unless the boilers are replaced.

These monitoring requirements have been imposed in order for the operator to demonstrate compliance with the emission limits specified in the permit. The operator will carry out monitoring in accordance with the relevant methods specified in our guidance M5.

We made these decisions in accordance with MCP and SG technical guidance: Medium Combustion Plant guidance: https://www.gov.uk//guidance/medium-combustion-plant-and-specified-generator-permits-how-to-comply

Based on the information in the application we are satisfied that the operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Reporting

We have added reporting in the permit for emissions of Oxides of nitrogen (NO and NO_2 expressed as NO_2 from the back up generator as per the MCPD. In addition, we have included reporting requirements for emissions of Oxides of nitrogen (NO and NO_2 expressed as NO_2) for the existing boilers (Boilers 1 & 2, emission points A1 and A2).

We made these decisions in accordance with the requirements of the Medium Combustion Plant Directive for medium combustion plants with a rated thermal input equal to or greater than 1MW and less than or equal to 20MW, we have specified 3 yearly monitoring.

We made these decisions in accordance with the MCP and SG technical guidance:
Medium Combustion Plant Guidance: https://www.gov.uk//guidance/medium-combustion-plant-and-specified-generator-permits-how-to-comply.

Management system

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.
The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit variation.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Part 2

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/BP3530BD
The Operator is:	Anglo Beef Processors Ltd
The Installation is:	EPR/BP3530BD
This Variation Notice number is:	EPR/BP3530BD/V003

What this document is about

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

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

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

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

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

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 01/08/2022 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 17/11/2022.

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 6, 9 and 12. In relation to this/these BAT Conclusion(s), we do not fully agree with the Operator in respect of their current stated capability as recorded in their response to the Regulation 61 Notice. We have therefore included Improvement Condition(s) IC4, IC5 and IC9 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 10/04/2024 which requested further clarification on BATc's 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and Environment Performance Levels (EPLs) for energy and wastewater. In addition, the request required further clarification on the onsite combustion plant, the completion of the Relevant Hazardous Substances (RHS) assessment, Climate Change Adaptation Plan and the onsite containment measures. A response was received on 23/04/2024. A further clarification request was issued on 15/05/2024 requiring further clarification on the responses provided regarding the following BATc's 3, 6, 7, 8, 9, 10, 11, 12 and 14. A response to the second clarification request was received on 22/05/2024. A copy of each of the further information requests and their responses was placed on our public register.

3 The legal framework

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

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

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

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

Annex 1: decision checklist regarding relevant BAT Conclusions

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

There are 37 BAT Conclusions.

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

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

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

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

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

NA – Not Applicable
CC – Currently Compliant
FC – Compliant in the future (within 4 years of publication of BAT Conclusions)
NC – Not Compliant

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	**Status** **NA/ CC / FC / NC**	**Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement**
GENERAL BAT CONCLUSIONS (BAT 1-15)			
1	**Environmental Management System - Improve overall environmental performance.** Implement an EMS that incorporates all the features as described within BATc 1.	**CC**	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. The operator has an EMS externally accredited to the ISO14001 standard which is valid until 17 November 2025.
2	**EMS Inventory of inputs & outputs. Increase resource efficiency and reduce emissions.** 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.	**CC**	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. In addition to having an established and accredited EMS which is to ISO 15001 standard. The Operator has submitted the following to demonstrate compliance with BATc 2. • An overview of the site processes • Information in support of water usage on site. • Characterisation of the waste water stream and effluent monitoring results. • Information regarding the quantity and characteristics of waste gas streams from the onsite boilers including relevant pollutants (NO_x and SO_x) • Information on energy (gas & electricity) consumption across the site, water usage and raw materials

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**
			usage along with wastes from the processes. • Identification of monitoring strategy aimed at reducing resources used on site.
3	**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).	**CC**	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. All process effluent from the site is screen before discharging to the foul sewer for further treatment. The following parameters(COD, Suspended Solids and pH) are monitored on a monthly basis by the sewage undertaker (Severn Trent Water).
4	**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.	**NA**	We are satisfied that BATc 4 is not applicable to this Installation. All process effluent is screened before being discharged to the foul sewer. There is no direct discharge to surface water other than uncontaminated surface water.
5	**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.	**NA**	We are satisfied that BATc 5 is not applicable to this Installation. There are no channelled emissions to air, other than those from the onsite boilers. Emissions from the onsite boilers will be monitored in accordance with the medium combustion plant directive (MCPD).

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**
6	**Energy Efficiency** 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.	**FC**	The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are not satisfied that the operator has demonstrated compliance with BATc 6. The Operator has not provided an energy efficiency plan as required under BATc 6a, the Operator provided an ESOS report dated 2015, whilst this considers energy use it doesn't cover the requirements of BATc 6a. The Operator has identified the following techniques that are undertaken at the site to improve energy efficiency. • Burner regulation and control • Energy efficient motors • Heat recovery • The use of LED lighting • Process control systems- • Reducing air leaks • Reducing heat loss with insulation • The use of variable speed drives We have included improvement condition (IC4) in the permit to achieve compliance. The operator is required to complete the improvement conditions and demonstrate compliance with the BAT Conclusions within 3 months of the variation being issued.

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**
7	**Water and wastewater minimisation** 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. (a) water recycling and/or reuse (b) Optimisation of water flow (c) Optimisation of water nozzles and hoses (d) Segregation of water streams Techniques related to cleaning operations: (e) Dry cleaning (f) Pigging system for pipes (g) High-pressure cleaning (h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP) (i) Low-pressure foam and/or gel cleaning (j) Optimised design and construction of equipment and process areas (k) Cleaning of equipment as soon as possible	**CC**	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. The Operator has provided justification as to why water recycling and/or reuse as per the requirements of BATc 7a is not under undertaken at the site. This is due to food hygiene standards and associated protocols. The Operator has identified the following techniques that are undertaken to reduce water consumption and the volume of waste water discharged. • Optimised flow using flow meters. • Optimised hoses and nozzles for washdown and general cleaning. • Foul and storm water lines are segregated to different drainage channels. • Dry cleaning is undertaken within all areas on site. • High pressure cleaning is carried out where suitable. • Cleaning in place is carried out. • Low pressure foam cleaning is carried out where suitable. • Water reduction is considered when designing and constructing the 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**
			and its equipment. • Cleaning is done on a very regular basis to ensure hygiene standards.
8	**Prevent or reduce the use of harmful substances** In order to prevent or reduce the use of harmful substances, e.g. in cleaning and disinfection, BAT is to use one or a combination of the techniques given below. (a) Proper selection of cleaning chemicals and/or disinfectants (b) Reuse of cleaning chemicals in cleaning-in-place (CIP) (c) Dry cleaning (d) Optimised design and construction of equipment and process areas	**CC**	The operator has provided information to support compliance with BATc 8. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 8. The Operator has identified the following techniques that are undertaken on site to prevent or reduce the use of harmful substances used. • The selection of chemicals is carried out based on needs of the facility and the activities • Dry cleaning is carried out • Optimisation of chemical use is done by daily measurement and control of usage as well as up to date chemical awareness training.
9	**Refrigerants** In order to prevent emissions of ozone-depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential.	**FC**	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. The Operator has provided an inventory of the refrigeration units at the site which includes the type and quantity of refrigeration gas used. A number of the units are listed as using R404a, R410a and R407c which have a global

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**
			warming potential above 1,400 are considered to be a greenhouse gas. We have included an Improvement Condition which requires the Operator to provide a plan that where practicable considers the retro filling of systems containing high GWP refrigerants with refrigerants that have a lower GWP, in addition to an action log with timescales for the replacement of end-of-life equipment using refrigerants with the lowest practical GWP. We have included improvement condition (IC5) in the permit to achieve compliance. The operator is required to complete the improvement conditions and demonstrate compliance with the BAT Conclusions within 3 months of the variation being issued
10	**Resource efficiency** In order to increase resource efficiency, BAT is to use one or a combination of the techniques given below: (a) Anaerobic digestion (b) Use of residues (c) Separation of residues (d) Recovery and reuse of residues from the pasteuriser (e) Phosphorus recovery as struvite (f) Use of waste water for land spreading	**CC**	The operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 10. The Operator has identified the following techniques that are undertaken to increase resource efficiency. • Screening from interceptor are taken offsite for treatment via Anaerobic Digestion

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**
			• Animal by products go for further processing, either for rendering or anaerobic digestion • Residues are separated using splash protectors, screens, catch pots and drip trays. • No waste is sent to landfill, cardboard and plastic is baled on site for recycling. All other waste is baled on site and sent for incineration and heat recovery.
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 has no means of buffering effluent on site as no effluent treatment processes are undertaken at the site. The Operator has confirmed that the site has no history of high strength or off-spec effluent. In the event there is a need to stop the discharge for any reason flow can be stopped at the discharge point and the mains water supply. The Operate has Emergency Response Procedures in place to deal with spills and to prevent off site discharges.
12	**Emissions to water – treatment** In order to reduce emissions to water, BAT is to use an appropriate combination of the techniques given below.	**FC**	The operator has provided information to support compliance with BATc 12. We have assessed the information provided and we are not satisfied that the operator has

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**
	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) Nitification and/or denitrification (f) Partial nitration - anaerobic ammonium oxidation Phosphorus recovery and/or removal (g) Phosphorus recovery as struvite (h) Precipitation (i) Enhanced biological phosphorus removal Final solids removal (j) Coagulation and flocculation (k) Sedimentation (l) Filtration (eg sand filtration, microfiltration, ultrafiltration) (m) Flotation		demonstrated compliance with BATc 12. The Operator currently has no form of effluent treatment on site other than the use of interceptors, all process effluent is discharged directly to the foul sewer under a trade effluent consent. BATc 12 requires a combination of the stated techniques to be implemented at the site to reduce emissions to water. We have included improvement condition (IC9) for the Operator to undertake a feasibility study on the feasibility of installing effluent treatment and include a review of treatment options available along with their associated benefits. Where no effluent treatment is provided justification is required, taking into account the nature of the wastewater and any subsequent off-site treatment. We consider that the operator will be future compliant with BATc 12. Improvement condition (IC9) has been included in the permit to achieve compliance (see Annex 3).
12	**Emissions to water – treatment** **BAT-associated emission levels (BAT-AELs) for direct emissions to a receiving water body**	**NA**	We are satisfied that the BAT-AELs associated with BATc 12 are not applicable to this Installation. The site discharges all process effluent to the foul sewer under a trade effluent consent from

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**
	<table><tr><th>Parameter</th><th>BAT-AEL (1) (2) (daily average)</th></tr><tr><td>Chemical oxygen demand (COD) (3) (4)</td><td>25-100 mg/l (5)</td></tr><tr><td>Total suspended solids (TSS)</td><td>4-50 mg/l (6)</td></tr><tr><td>Total nitrogen (TN)</td><td>2-20 mg/l (7) (8)</td></tr><tr><td>Total phosphorus (TP)</td><td>0,2-2 mg/l (9)</td></tr></table>		Severn Trent Water. There are no direct discharges to surface water.
13	**Noise management plan** 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: - a protocol containing actions and timelines; - a protocol for conducting noise emissions monitoring; - a protocol for response to identified noise events, e.g. 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**	BAT 13 is only applicable to cases where a noise nuisance at sensitive receptors is expected and/or has been substantiated, or if forms part of an existing permit requirement. The site does not have a history of substantiated noise complaints either directly to the site or via the regulator. There is no formal noise management plan implemented however, within the site governance systems elements of a noise management plan are in place.
14	**Noise management** 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. (a) Appropriate location of equipment and buildings (b) Operational measures (c) Low-noise equipment (d) Noise control equipment (e) Noise abatement	**CC**	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. The operator implements the following techniques in order to prevent or reduce noise emissions: a) All processes are undertaken indoors

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**
			b) All equipment is regularly serviced by the onsite maintenance team. In addition all windows and doors are kept closed.
15	**Odour Management** 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: - a protocol containing actions and timelines; - a protocol for conducting odour monitoring. - a protocol for response to identified odour incidents eg complaints; - an odour prevention and reduction programme designed to identify the source(s); to measure/estimate odour exposure: to characterise the contributions of the sources; and to implement prevention and/or reduction measures.	**NA**	BAT 15 is only applicable to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated, or if forms part of an existing permit requirement. The site does not have a history of substantiated odour complaints either directly to the site or via the regulator. There is no formal odour management plan implemented however, within the site governance systems elements of an odour management plan are in place.
	MEAT PROCESSING BAT CONCLUSIONS (BAT 29)		
29	**Emissions to air – Meat Processing Sector** In order to reduce channelled emissions of organic compounds to air from meat smoking, BAT is to use one or a combination of the techniques given below	**NA**	We are satisfied that BATc 29 is not applicable to this Installation. The Operator stated that the sites does not uses any of the techniques listed to reduce channelled emissions from on-site smoking.

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**
	<table><tr><th colspan="2">Technique</th><th>Description</th></tr><tr><td>(a)</td><td>Adsorption</td><td>Organic compounds are removed from a waste gas stream by retention on a solid surface (typically activated carbon).</td></tr><tr><td>(b)</td><td>Thermal oxidation</td><td>See Section 14.2.</td></tr><tr><td>(c)</td><td>Wet scrubber</td><td>See Section 14.2. An electrostatic precipitator is commonly used as a pretreatment step.</td></tr><tr><td>(d)</td><td>Use of purified smoke</td><td>Smoke generated from purified primary smoke condensates is used to smoke the product in a smoke chamber.</td></tr></table>		
23	BAT-associated emission level (BAT-AEL) for channelled dust emissions to air from a smoke chamber <table><tr><th>Parameter</th><th>Description</th><th>BAT-AEL (average over the sampling period)</th></tr><tr><td>TVOC</td><td>Mg/Nm^3</td><td><3-50 (1)(2)</td></tr><tr><td colspan="3">(1) The lower end of the range is typically achieved when using adsorption or thermal oxidation. (2) The BAT-AEL does not apply when the TVOC emission load is below 500 g/h.</td></tr></table> The associated monitoring is given in BAT 5.	**NA**	We are satisfied that the BAT-AELs associated with BATc 29 are not applicable to this Installation. The Operator stated that the sites does not undertake on-site smoking.
Meat Processing Environmental Performance Levels			

<table>
<tr><th>BATC No.</th><th>Summary of BAT Conclusion requirement for Food, Drink and Milk Industries</th><th>Status

NA/ CC / FC / NC</th><th>Assessment of the installation capability and any alternative techniques proposed by the operator to demonstrate compliance with the BAT Conclusion requirement</th></tr>
<tr><td>EPL</td><td>Environmental Performance Level – Energy consumption for the meat processing sector
<table><tr><th>Unit</th><th>Specific energy consumption (yearly average)</th></tr><tr><td>MWh/tonne of raw materials</td><td>0,25-2,6 (1)(2)</td></tr><tr><td colspan="2">(1) The specific energy consumption level does not apply to the production of ready meals and soups.

(2) The upper end of the range may not apply in the case of a high percentage of cooked products.</td></tr></table></td><td>CC</td><td>The operator has provided information to support compliance with the energy EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with the energy consumption for meat processing.

The specific energy consumption range for meat processing is 0.25-2.6 MWh/tonne of product produced. The operator reports that the current energy consumption for the site is 2.32 MWh/tonne, which is within the EPL range</td></tr>
<tr><td>EPL</td><td>Environmental Performance Level – Specific waste water discharge for the meat processing sector

<table><tr><th>Unit</th><th>Specific waste water discharge (yearly average)</th></tr><tr><td>m3 /tonne of raw materials</td><td>1,5-8,0 (1)</td></tr><tr><td colspan="2">(1) The specific waste water discharge level does not apply to processes using direct water cooling and to the production of ready meals and soups.</td></tr></table></td><td>CC</td><td>The operator has provided information to support compliance with BATc EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc EPL.

The specific waste water discharge range is 1.5-8.0m^3/ tonne of product produced for the meat processing sector. The operator reports that the current energy consumption for the site is 1.03m^3/tonne of raw material, which is within the EPL range.</td></tr>
</table>

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

Updating permit during permit review consolidation

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.
This included some other administrative changes to the permit to ensure cross-sector consistency, including:

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

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. There has been no change in the capacity of the site since the site was originally permitted, the capacity has reminded the same at 100,000 tonnes/year which equates to 400 tonnes/day, when operating over a 250 days a year.

During the determination of the variation the Operator has advised that the number of days the stie is operational for has increased to 364 days a year and consequently the production capacity has increased to 173,000 tonnes a year. The increase in production capacity has increased the daily capacity to 475 tonnes/day. Given that the increase in capacity is that of the threshold for the permitted activity we have advised the Operator that they will need to apply for separate variation. The capacity within the permit will remain at 400 tonnes/day.

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.

COD Loss efficiency

As part of the Food, Drink and Milk permit review Operators are required to report on COD efficiency which focuses on losses to effluent, mainly during the cleaning processes. The requirement requires a weekly assessment of the COD load within the raw effluent and is reported as COD te/tonne of product. During the determination the Operator challenged the adoption of this approach, in that they measure product loss is in tonnes rather than via COD. The Operator follows the WRAP guidance for reporting food waste and the product is weighted at every stage through the process, including any waste. We have considered the Operators alternative method for measuring food waste and have removed the COD loss efficiency performance reporting parameter form the variation. In addition, the sewer undertaker monitors COD on a monthly basis. The Operator has agreed to provide the monitoring results to the Environment Agency.

Implementing the requirements of the Medium Combustion Plant Directive

Existing Medium Combustion Plant (1MW-50MW)

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

- Number of combustion plant (CHP engines, back-up generators, boilers);
- Size of combustion plant – rated thermal input (MWth)
- Date each combustion plant came into operation

The Operator provided the information in the tables below:

Boilers

	Boiler 1	**Boiler 2**
1. Rated thermal input (MW) of the medium combustion plant.	1 MWth	1 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Boiler	Boiler
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Natural gas and Gas Oil (70% of the time boilers will operate on natural gas)	Natural gas and Gas Oil (70% of the time boilers will operate on natural gas)
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 2004	January 2004

Back-up generators

1. Rated thermal input (MW) of the medium combustion plant.	1.76 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Generator – Combined heat and power
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Diesel (gas oil)

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.	December 2022

We have reviewed the information provided and we consider that Boiler 1 and Boiler 2 qualify as “existing” medium combustion plant.

For existing MCP with a rated thermal input of less than or equal to 5 MW, the emission limit values set out in tables 1 and 3 of Part 1 of Annex II MCPD shall apply from 1 January 2030. 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.

Under the MCPD the limits and monitoring requirements for the back-up generator are only applicable if the generator is operational for more than 500 hours a year, as a rolling average over a period of three years.

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 [SP1 Site Report, 26 January 2004] during the original application received on 13 August 2004. 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 has accepted 'zero contamination' beneath the site. This means that when the Operator applies to surrender the Permit, any contamination by substances used at, produced or released from the facility would be considered to have resulted from the operation of the installation. This is in accordance with the Environment Agency Guidance H5 – Site Condition Report.

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 not undertaken an assessment to identify if any hazardous substances are used or stored at the installation.

The operator is required to undertake an assessment to ascertain if any hazardous substances are used or stored at the site. If hazardous substances are found to be used or stored at the site the operator is to undertake a short risk assessment on the hazardous substances stored and used at the installation. The risk assessment is 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.

We have included an improvement condition into the permit (IC6) to request that the assessment is undertaken and is submitted by the operator for approval from the Environment Agency.

If the outcome of the three stage assessment identified that pollution of soil / groundwater to be possible, and monitoring is required for these hazardous substance(s). The operator is required to submit a relevant hazardous substances monitoring plan for review to the Environment Agency via improvement condition (IC7).

Climate Change Adaptation

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

The operator has identified the installation as likely to be or has been affected by 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 (IC 10) to request a climate change adaptation plan is submitted by the operator for approval from the Environment Agency.

Containment

We asked the Operator vis 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 appliable.

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 and their findings. We are not satisfied that the existing tanks and containment measures on site meet the standards set out in CIRIA C736.

We have set improvement conditions in the permit to address the deficiencies in the existing tanks and containment measures on site (IC8). See Improvement condition(s) in Annex 3 of this decision document.

Annex 3: Improvement Conditions

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

Previous improvement conditions marked as complete in the previous permit.

Superseded Improvement Conditions – Removed from permit as marked as "complete"	
Reference	**Improvement Condition**
IC1	The Operator shall 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. Upon completion of the plan a summary of the document shall be submitted to the Agency in writing.
IC2	The operator shall undertake the proposed monitoring programme for emissions to sewer (described on page 14 of the Application Site Report, November 2004) from the date line 2 is commissioned. The monitoring methods shall be undertaken as described in table 2.10.1 of this permit. The results shall be submitted in writing to the Agency
IC3	The Operator shall assess the current method for effluent flow with the requirements given in the MCERTS standard 'Minimum requirements for the self-monitoring of effluent flow' version 2, Aug 2004. A written report shall be provided to the Agency detailing how this standard is to be achieved and shall include time-scales for implementation.

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**
IC4	The operator shall submit, for approval by the Environment Agency, a report demonstrating achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk Bref published on 4 December 2019 where BAT is currently not demonstrated or achieved. The report shall include, but not be limited to, the following: • Methodology applied for achieving BAT • Demonstrating that BAT has been achieved. The report shall address the BAT Conclusions for Food,	24/10/2024 or as agreed in writing by the Environment Agency

	Drink and Milk Industries with respect to BATc 6 Refer to BAT Conclusions for a full description of the BAT requirement.	
IC5	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. To demonstrate compliance against BAT 9, the operator shall produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be assessed by the Environment Agency and shall be incorporated within the existing environmental management system. The plan should include, but not be limited to, the following: • 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.	24/10/2024 or as agreed in writing by the Environment Agency
IC6	The operator shall submit to the Environment Agency for approval a risk assessment considering the possibility of soil and groundwater contamination at the installation where the activity involves the use, production or release of a hazardous substances (as defined in Article 3 of Regulation (EC) No. 1272/2008 on classification, labelling and packaging of substances and mixtures). A stage 1-3 assessment should be completed (as detailed within the EC Commission Guidance 2014/C 136/-3) as follows; • Stage 1 – Identify hazardous substance(s) used / stored on site. • Stage 2 – Identify if the hazardous substance(s) are capable of causing pollution. If they are capable of causing pollution, they are then termed Relevant Hazardous Substances (RHS). • Stage 3 – Identify if pollution prevention measures & drains are fit for purpose in areas where hazardous substances are used / stored. If the outcomes of Stage 3 identifies that pollution of soil / ground water to be possible. The operator shall produce and submit a monitoring plan to the Environment Agency for approval detailing how the substance(s) will be monitored to demonstrate no pollution. The operator shall commence monitoring of the RHS within a timescale as agreed by the Environment Agency.	24/07/2025 or as agreed in writing with the Environment Agency
IC7	The operator shall produce a monitoring plan detailing	24/07/2025 or as agreed in

	how the management of relevant hazardous substances which did not screen out as low risk, based on the RHS baseline assessment (undertaken in IC 10), 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.	writing with the Environment Agency
IC8	The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site and review measures against relevant standard including: • CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises, • EEMUA 159 - Above ground flat bottomed storage tanks The operator shall submit a written report to the Environment Agency approval which outlines the results of the survey and the review of standard and provide details of • current containment measures • any deficiencies identified in comparison to relevant standards, • improvements proposed • time scale for implementation of improvements. The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.	24/07/2025 or as agreed in writing with the Environment Agency
IC9	The Operator shall submit a written report to the Environment Agency for technical assessment and approval on the feasibility of installing effluent treatment and include a review of treatment options available along with their associated benefits. Justification is required where no on-site treatment is provided, taking into account the nature of the wastewater and any subsequent off-site treatment. In addition the report needs to consider the appropriate on-site monitoring of the effluent stream prior to disposal. (BAT 3 and 12 Best Available Techniques Reference Document and BAT Conclusions document for the food, drink and milk industry dated December 2019).	24/07/2025 or as agreed in writing with the Environment Agency
IC10	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: • 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;	24/07/2025 or as agreed in writing with the Environment Agency

	• 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.	