

# Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Cargill PLC

Seaforth Mill & Refinery Cargill PLC No 2 Gladstone Dock Seaforth Merseyside L20 1BG

#### Variation application number

EPR/BN4169IZ/V009

Permit number

EPR/BN4169IZ

# Seaforth Mill & Refinery Permit number EPR/BN4169IZ

## 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 4<sup>th</sup> December 2019 in the official journal of the European Union.

The schedules specify the changes made to the permit.

The main features of the permit are as follows.

Seaforth Mill & Refinery installation is located in Gladstone Dock, Seaforth at national grid reference NGR SJ3255596266 in an industrial area with human receptors at approximately 400m East form the site's boundary.

Soya beans are received at the neighbouring grain silos and enter the site via a transfer conveyor and into storage Silos. The beans are then drawn into the process, screened, cleaned, and heated to control the moisture content before being passed into a bean cracking process to split the beans and remove the hulls. The hulls are then separated through aspiration and cyclones, prepared, and pelletised for onward sale as animal feed.

The surface of the cracked bean is then increased in a flaker so that the efficiency of the solvent extraction stage is increased. A portion of the flaked bean is also expanded before being passed to the extractor. The flaked beans are washed with hexane to dissolve the oil. The products from the extraction stage are a hexane/oil mixture called miscella and a soya bean meal containing hexane.

The solvent is removed from the soya bean meal by the direct and indirect application of steam in a desolventiser toaster. The resulting de-natured meal is dried, cooled, screened further and ground in a new process building before being stored and subsequently sold on as animal feed.

The miscella is passed through a series of evaporative steps to remove the solvent from the oil. The solvent is recovered for re-use through condensers and a mineral oil absorption system. The solvent-free oil is passed to a degumming process to leave a crude oil. The gums will be added back to the meal in the desolventiser toaster. The crude oil is passed on to the adjacent refinery.

Process water effluent is discharged to under consent to Rimrose sewer while water abstracted from the Gladstone Dock is used as a cooling agent in a closed loop and returned to the dock following the settlement stage.

Combustion gases are released into the atmosphere via air emission points servicing two boilers of under 1 MWth combined input. Other air emissions comprise particulate matter from manufacturing processes and hexane solvent from the extraction final vent.

There are several protected areas (England and Wales) surrounding the installation, including four special areas of conservation (SAC), seven special protection areas (SPA), and four RAMSAR sites along with two sites of special scientific interest (SSSI), one local nature reserve, and three local wildlife sites.

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/BN4169IZ/A001	Duly Made 22/03/2005	Application for oilseed processing			
Additional information received	28/09/2005				
Additional information received	02/12/2005				
Permit determined EPR/BN4169IZ	24/03/2006	Original permit issued to Cargill PLC			
Application EPR/BN4169IZ/V002	Duly Made 26/03/2009				
Application EPR/BN4169IZ/V002	Withdrawn				
Application EPR/BN4169IZ/V003 (Variation and consolidation)	Duly made 07/02/2011	Application to vary and update the permit to modern conditions.			
Variation determined EPR/BN4169IZ	28/03/2011	Variation permit issued			
Application EPR/BN4169IZ/V004	Duly made 14/10/2013	Application to incorporate a second Deodorizer, boiler replacement and associated equipment upgrades			
Variation determined EPR/BN4169IZ	23/12/2013	Varied permit issued			
Notified of change of company registered office address	27/01/2016	Registered office address changed to Velocity V1, Brooklands Drive, Weybridge, Surrey, KT13 0SL			
Variation issued EPR/BN4169IZ/V005	02/02/2016	Varied permit issued			
Application EPR/BN41669IZ/V006	Withdrawn 14/08/2019	Application withdrawn.			
Application EPR/BN4169IZ/V007 (variation and consolidation)	Duly made 14/09/2020	Variation to increase soya bean processing capacity of the plant, extend the site boundary, relocate some emission points to air and change the emission limit values for particulate emission points to air in line with BAT.			
Additional information received	20/10/2020	Revised permit application report - 8548-G018- 011001 – 2.			
Schedule 5 Notice response received.	09/06/2021	Response to questions 1 to 4 of Information Notice dated 03/12/2020. Associated documents include:			
		<ul> <li>43148-WOOD-XX-XX-RP-O-0009_A_C1 Air Quality Assessment</li> </ul>			
		BAT Assessment			
		• Finished oil tank bund assessment (summary)			
		R9889 Environmental Noise Assessment			
Additional information received	21/07/2021	43148-WOOD-XX-XX-RP-O-0010_A_C1 Air quality addendum submitted in response to questions regarding how the emission rates from the point source emissions to air were calculated for the existing and proposed sources.			
Additional information received	08/09/2021	Updated site plan			
Variation determined and consolidation issued EPR/BN4169IZ	16/12/2021	Varied and consolidated permit issued in a modern format.			

Application EPR/BN4169IZ/V009 (variation and consolidation)	Regulation 61 Notice response received 21/10/2022	Environment Agency initiated variation and consolidation following the Food, Drink & Milk Industries sector permit review.
Application EPR/BN4169IZ/V008 (variation and consolidation)	Duly Made 25/01/2023	Variation to add emission point A19, for hulls pellet out-loading filter exhaust. In addition to removing monitoring from emission point A6 of the extraction air break.
Variation determined and consolidation issued EPR/BN4169IZ	03/03/2023	Varied and consolidated permit issued in a modern format.
Request for further information (dated 24/05/2023)	30/06/2023	BATcs 1, 4, 6(b), 8, 9, 11, 13, 14, 30, 31, BAT- AELs, BAT-EPL, MCPs, containment, cooling towers, and updated site plan.
Additional information received (dated 06/07/2023)	11/07/2023	Clarifications provided regarding the fate of uncontaminated water discharge, BATc 11, and water discharge points W1, W2 and W3.
Variation determined and consolidation issued EPR/BN4169IZ	21/08/2024	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/BN4169IZ

#### Issued to

Cargill PLC ("the operator")

whose registered office is

Velocity V1 Brooklands Drive Weybridge Surrey KT13 0SL

company registration number 01387437

to operate a regulated facility at

Seaforth Mill & Refinery Cargill PLC No 2 Gladstone Dock Seaforth Merseyside L20 1BG

to the extent set out in the schedules.

The notice shall take effect from 21/08/2024.

Name	Date
Sandra Cavill	21/08/2024

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/BN4169IZ

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/BN4169IZ/V009 authorising,

Cargill PLC ("the operator"),

whose registered office is

Velocity V1 Brooklands Drive Weybridge Surrey KT13 0SL

company registration number 01387437

to operate an installation at

Seaforth Mill & Refinery Cargill PLC No 2 Gladstone Dock Seaforth Merseyside L20 1BG

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

Name	Date
Sandra Cavill	21/08/2024

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.
- 2.3.5 The operator shall ensure that where waste produced by the activities is sent to a landfill site, it meets the waste acceptance criteria for that landfill.

#### 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.

#### 3.2 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.
- 4.2.5 The operator shall submit an annual solvent management plan in order to demonstrate compliance with the requirements of the Industrial Emissions Directive, by 31 January each year in respect of the previous year.

#### 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.
- 4.3.7 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:
  - (a) a decision by the Secretary of State not to re-certify the agreement;
  - (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
  - (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

#### 4.4 Interpretation

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

Table S1.1 ac	Table S1.1 activities					
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity and waste types			
AR1	Section 6.8 Part A1 (d) (ii)	Treatment and processing vegetable raw materials intended for the production of food or feed with a finished product production capacity greater than 300 tonnes per day.	From receipt of raw materials delivered to the site to processing of soya beans for extraction of oil content of bean, production of soya meal from extraction, production of hulls pellets, production of lecithin, refining of crude oil by use of hexane from extraction to despatch of finished products. Production capacity is limited to 3,200 tonnes per day.			
Directly Asso	ciated Activity					
AR2	Steam supply	Medium Combustion plants: Boiler 1 – 0.5 MWth Boiler 2 – 0.25 MWth Natural gas fired.	From receipt of fuel to release of products of combustion to air.			
AR3	Raw material storage and handling	Storage and handling of raw materials at the installation	From receipt of raw materials to dispatch of final product.			
AR4	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.			
AR5	Waste storage and handling	Storage and handling of waste materials	From generation of waste to storage pending removal for disposal or recovery.			
AR6	Surface water drainage	Collection of uncontaminated site surface waters	Handling and storage of site drainage until discharge to the site surface water system via interceptor leading to the River Mersey via Gladstone Dock.			

Table S1.2 Operating techniques				
Description	Parts	Date Received		
Application for variation	Response to 2b of part C2 of the application and supporting documents 1 and 2.	07/02/2011		
Application for variation	Non-technical Summary and supporting document 23143- Addendum	14/10/2013		
Response to Schedule 5 Notice dated 03/12/2020	<ul> <li>Finished oil Tank bund assessment summary:</li> <li>BAT Assessment - Compliance and operating techniques identified in response to BAT Conclusions 5, 6, 17, 30, 31 and 32 in the Food and Drink BAT conclusions published in 2019.</li> </ul>	09/06/2021		
Application EPR/BN4169IZ/V008	<ul> <li>Application forms Parts C2 and C3 and associated supporting information, including:</li> <li>Non-technical summary</li> <li>Block Flow Diagram &amp; Alterations to block flow diagram</li> <li>Site layout C-00-9007 (AA) – emission point plan</li> <li>H1 data for emission point A19</li> <li>Air impact assessment for emission point A19</li> <li>Certification for abatement technology</li> </ul>	Duly made 25/01/2023		
Regulation 61 (1) Notice – Responses to questions dated 08/06/2022	All parts	Received 21/10/2022		
Request for further information dates 24/05/2023	BATcs 1, 4, 6(b), 8, 9, 11, 13, 14, 30, 31, BAT-AELs, BAT-EPL, MCPs, containment, and updated site plan	30/06/2023		
Additional information (dated 06/07/2023)	Uncontaminated water discharge, BATc 11, and water discharge points W1, W2 and W3	11/07/2023		

Table S1.3 I	Table S1.3 Improvement programme requirements				
Reference	Requirement	Date			
IC8	The operator shall submit, for approval by the Environment Agency, rolling monitoring plan for total volatile organic carbon (TVOCs) emissions from principal emission points on site. The procedure must describe how the operator will implement a rolling monitoring programme which shall include, but not be limited to the following:	21/02/2025 or other date agreed in writing with the Environment Agency			
	<ol> <li>Methodology for how representative monitoring will be carried out annually, with a minimum of 3-point sources on a rolling-basis.</li> <li>Ensuring the key process stages inclusive of mineral oil absorption, meal drying and cooling are prioritised.</li> <li>Identify any principal emission points excluded from the rolling monitoring programme and provide a justification for this.</li> <li>Provide a commencement date for the programme which will demonstrate compliance with the permit requirements.</li> </ol>				
	The monitoring procedure shall address the requirements of BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 5.				
IC9	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	21/11/2024 or other date agreed in writing with the			

Table S1.3 I	Table S1.3 Improvement programme requirements				
Reference	Requirement	Date			
	where BAT is currently not demonstrated or achieved. The report shall include, but not be limited to, the following:	Environment Agency			
	Methodology applied for achieving BAT				
	Demonstrating that BAT has been achieved.				
	The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 6.				
	Refer to BAT Conclusions for a full description of the BAT requirement.				
IC10	<ul> <li>The Operator shall submit an updated Solvent Management Plan (SMP) to the Environment Agency for technical assessment and approval, demonstrating compliance against BAT 32 for the FDM industries. Further guidance on SMPs can be found on our website Solvent Management Plans: environmental permits - GOV.UK (www.gov.uk )</li> <li>The updated plan must include the following elements: <ul> <li>a protocol containing remediation actions and timelines;</li> <li>a protocol for conducting solvent emissions monitoring;</li> <li>a protocol for response to identified solvent loss events, e.g. fugitive emissions;</li> <li>a protocol to reduce solvent mass-balance uncertainties;</li> </ul> </li> </ul>	21/08/2025 or other date agreed in writing with the Environment Agency			
	<ul> <li>a solvent reduction programme designed to identify the source(s), to measure/estimate solvent loss, to characterise the contributions of the sources and to implement prevention and/or reduction measures.</li> <li>The solvent management plan should be reviewed at least annually to ensure continued compliance against BAT 32 as described above.</li> </ul>				
IC11	The Operator shall submit a written report to the Environment Agency of monitoring carried out to determine the size distribution of particulate matter in the exhaust gas emissions to air from emission points A3, A5, A7, A8, A10, A11, A12, A13, A15, A16, A17, A18, identifying the fractions within the PM <sub>10</sub> and PM <sub>2.5</sub> ranges. The monitoring shall be carried out under representative operating conditions and shall be in accordance with EN ISO 23210 unless otherwise agreed with the Environment Agency.	21/08/2025 or other date as agreed in writing with the Environment Agency			

# Schedule 2 – Waste types, raw materials and fuels

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

# Schedule 3 – Emissions and monitoring

Table S3.1 Pc	oint source en	nissions 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 0.25 MWth Natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	No limit set			
		Carbon monoxide	No limit set			
A2 [Point A2 on site plan in Schedule 7]	Boiler Plant 0.5 MWth Natural gas	Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> )	No limit set			
		Carbon monoxide	No limit set			
A3 [Point A3 on site plan in Schedule 7]	Preparation Main Filter exhaust via bag filter	Particulate matter	5 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
A4 [Point A4 on site plan in Schedule 7]	Pelletising mill cooler exhaust	Particulate matter	10 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
A5 [Point A5 on site plan in Schedule 7]	Meal grinding aspiration exhaust via bag filter	Particulate matter	5 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
A6 [Point A6 on site plan in Schedule 7]	Extraction emergency air brake	Particulate matter	No limit set			
A7 [Point A7 on site plan in Schedule 7]	Vertical seed conditioner exhaust via cyclone	Particulate matter	10 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
A8 [Point A8 on site plan in Schedule 7]	Secondary de-hulling aspiration via bag filter and cyclone	Particulate matter	5 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
A9 [Point A9 on site plan in Schedule 7]	Expander aspiration fan	Particulate matter	10 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1

Table S3.1 Po	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 [Point A10 on site plan in Schedule 7]	Hot DC exhaust fan from drying	Particulate matter	20 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1	
	decks via cyclone	TVOC	No limit set	Average over sampling period	Annually	EN 12619	
A11 [Point A11 on site plan in Schedule 7]	Hot DC exhaust fan from drying decks via	Particulate matter	20 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1	
	cyclone	TVOC	No limit set	Average over sampling period	Annually	EN 12619	
A12 [Point A12 on site plan in Schedule 7]	Hot DC exhaust fan from drying decks via	Particulate matter	20 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1	
	cyclone	TVOC	No limit set	Average over sampling period	Annually	EN 12619	
A13 [Point A13 on site plan in Schedule 7]	Hot DC exhaust fan from drying decks via	Particulate matter	20 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1	
	cyclone	TVOC	No limit set	Average over sampling period	Annually	EN 12619	
A14 [Point A14 on site plan in Schedule 7]	Extraction final vent	Hexane	2 kg/hour	Rolling average monthly	Continuous	Infrared transmitter	
		TVOC	No limit set	Average over sampling period	Annually	EN 12619	
A15 [Point A15 on site plan in Schedule 7]	Hulls grinding aspiration exhaust via bag filter	Particulate matter	5 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1	
A16 [Point A16 on site plan in Schedule 7]	Flaker aspiration exhaust via cyclone	Particulate matter	10 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1	

Source	Devenueter				
Source	Parameter	Limit (including unit)	Reference period	Monitoring frequency	Monitoring standard or method
Cascade dryer exhaust via cyclone	Particulate matter	10 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
Cascade conditioner exhaust via cyclone	Particulate matter	10 mg/m <sup>3</sup>	Average over sampling period	Annually	BS EN 13284-1
Hulls pallet out-loading exhaust via bag filter	Particulate matter	No limit set			
Installation overall	Hexane losses	0.55 kg/tonne of soybeans processed	Average over sampling period	Annually	As specified by Solvent Management Plan [NOTE 1]
	dryer exhaust via cyclone Cascade conditioner exhaust via cyclone Hulls pallet out-loading exhaust via bag filter Installation	dryer exhaust via cyclonematterCascade conditioner exhaust via cycloneParticulate matterHulls pallet out-loading exhaust via bag filterParticulate matterInstallationHexane	Unit)Cascade dryer exhaust via cycloneParticulate matter10 mg/m³Cascade conditioner exhaust via cycloneParticulate matter10 mg/m³Cascade conditioner exhaust via cycloneParticulate matter10 mg/m³Hulls pallet out-loading exhaust via bag filterParticulate matterNo limit setInstallation overallHexane losses0.55 kg/tonne of soybeans	UnitUnitCascade dryer exhaust via cycloneParticulate matter10 mg/m³Average over sampling periodCascade conditioner exhaust via cycloneParticulate matter10 mg/m³Average over sampling periodCascade conditioner exhaust via cycloneParticulate matter10 mg/m³Average over sampling periodHulls pallet out-loading exhaust via bag filterParticulate matterNo limit set over sampling periodInstallation overallHexane losses0.55 kg/tonne of soybeans processedAverage over sampling	Unit)Unit)Average over sampling periodAnnuallyCascade dryer exhaust via cycloneParticulate matter10 mg/m³Average over sampling periodAnnuallyCascade conditioner exhaust via cycloneParticulate matter10 mg/m³Average over sampling periodAnnuallyLascade conditioner exhaust via cycloneParticulate matter10 mg/m³Average over sampling periodAnnuallyHulls pallet out-loading exhaust via bag filterParticulate matterNo limit set over sampling periodInstallation overallHexane losses0.55 kg/tonne of soybeans processedAverage over samplingAnnually

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 on site plan in schedule 7	Refinery dockwater discharge	рН	6 – 9		Continuous	BS6068 - 2.5:1995
emission to Gladstone Dock		Temperature	Max. 30 <sup>o</sup> C		Continuous	Temperature probe
W2 on site plan in schedule 7 emission to Gladstone Dock	Crush dockwater discharge	Temperature	Max. 30 <sup>o</sup> C		Continuous	Temperature probe
W3 on site plan in schedule 7 emission to Gladstone Dock	Extract dockwater discharge	Temperature	Max. 30 <sup>o</sup> C		Continuous	Temperature probe

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 Rimrose Brook Sewer	Refinery plant	No parameter set	No limit set			
S2 [Point S2 on site plan in schedule 7] emission to Rimrose Brook Sewer	Crush plant	No parameter set	No limit set			

# 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	A3, A4, A5, A7, A8, A9, A10, A11, A12, A13, A15, A16, A17, A18.	Every 12 months	1 January
Hexane kg/hr	A14	Quarterly	1 January, 1 April, 1 July & 1 October

Table S4.2: Annual production/treatment		
Parameter	Units	
Input of soybeans	tonnes	
Meal production	tonnes	
Crude oil production	tonnes	
Hulls pallets	tonnes	

Table S4.3 Performance parameters		
Parameter	Frequency of assessment	Units
Water usage	Annually	m <sup>3</sup>
Energy usage	Annually	MWh
Waste	Annually	tonnes
COD loss efficiency	Annually*	COD te/te product
Food waste	Annually	Tonnes
*COD loss efficiency to be cal	culated on a weekly frequency, reported annu	ally

0Table 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 water (other than sewer)	Emissions to Water 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		

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

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

(c) Notification requirements for the breach of permit conditions not related to limits To be notified within 24 hours of detection		
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		
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.

"average over the sampling period" means the average value of three consecutive measurements of at least 30 minutes each, unless otherwise stated, as defined in the General Considerations section of the Food, Drink & Milk Industries BAT Conclusions.

"emissions to land" includes emissions to groundwater.

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

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

"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.

"Pests" means Birds, Vermin and Insects.

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



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