

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/SP3936AK
The Operator is: Greencore Food To Go Limited
The Installation is: Greencore Food To Go Spalding
This Variation Notice number is: EPR/SP3936AK/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 03/08/2022 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 01/12/2022.

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 have no reason to consider that the Operator will not be able to comply with the techniques and standards described in the BAT Conclusions.

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 a further information request on 09/09/2024. A copy of the further information request was placed on our public register. The following information was requested:

- BATc 6 – Clarification of what techniques are currently being used on site to meet energy efficiency and if there is an energy efficiency plan in place and to provide a copy
- BATc 9 – provide a copy of the plan in place to replace the higher GWP models

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	<p>Environmental Management System - Improve overall environmental performance.</p> <p>Implement an EMS that incorporates all the features as described within BATc 1.</p>	CC	<p>The Operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 1.</p> <p>Greencore Plc has an Environmental Policy statement with an explicit commitment to continuous improvement.</p> <p>The site is reviewing its existing environmental governance documentation to ensure alignment with the Food and Drink general BAT conclusions 1 (i-xx) and that of ISO14001:2015 and Group Standards.</p>
2	<p>EMS Inventory of inputs & outputs. Increase resource efficiency and reduce emissions.</p> <p>Establish, maintain and regularly review (including when a significant change occurs) an inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the features as detailed within the BATCs.</p>	CC	<p>The Operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 2.</p> <p>The operator confirms water, energy consumption, raw materials and waste streams are monitored and tracked. The information collected is used to generate recommendations for improvement projects, which are taken forward for business case where feasible.</p> <p>The site reports key performance indicator data on a daily basis for the site and on a monthly basis at Group level for review.</p>
3	<p>Monitoring key process parameters at key locations for emissions to water.</p> <p>For relevant emissions to water as identified by the inventory of waste water streams (see BAT 2), BAT is to monitor key process parameters (e.g. continuous monitoring of waste water flow, pH and temperature) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation).</p>	CC	<p>The Operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 3.</p>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			<p>Site reports KPI data on a daily basis for site management and monthly basis for Group collective management. This includes review of regulator (Anglian Water) analysis. Group level reporting is used to formulate Greencore's annual collation for multiple annual reports and audits. The site has a prescriptive monitoring and maintenance plan that provides an audit trail for data down to the individual item of plant/equipment as appropriate.</p>
4	<p>Monitoring emissions to water to the required frequencies and standards. BAT is to monitor emissions to water with at least the frequency given [refer to BAT 4 table in BATc] and in accordance with EN standards. If EN standards are not available, BAT is to use ISO, national or other international standards that ensure the provision of data of an equivalent scientific quality.</p>	NA	<p>We are satisfied that BATc 4 is not applicable to this Installation.</p> <p>BATc 4 applies in the case of direct discharge of effluent to a water body. All process effluent from the site is discharged to sewer. The site does not discharge directly to surface water.</p>
5	<p>Monitoring channelled emissions to air to the required frequencies and standards. BAT is to monitor channelled emissions to air with at least the frequency given and in accordance with EN standards.</p>	NA	<p>We are satisfied that BATc 5 is not applicable to this Installation.</p> <p>BATc 5 sets out air emissions monitoring requirements applicable to specific FDM sub-sectors. None of these monitoring requirements are applicable to this site as the activities undertaken are not specified in the sector and specific processes set out in BATc 5.</p>
6	<p>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.</p>	FC	<p>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.</p> <p>As part of its EMS, the site has in place an energy efficiency plan owned by the SLT and</p>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
			<p>delivered by engineering. As part of the strategic review of Group standards the procedure for monitoring, measurement, tracking and reporting of benchmarked absolute and specific energy consumption performance indicators is under review. No Energy Efficiency Plan provided however, the following techniques are stated in the Reg61</p> <ul style="list-style-type: none"> • The site has full modulation on one of the existing boilers with high/low fire only on the other. • Compressed air systems are optimised and maintained inhouse and in conjunction with third party specialists where appropriate. • Boiler blowdown is undertaken manually and validated in conjunction with third party specialists. • Heat recovery is currently employed from the ammonia compressors. • The site has replaced the majority of lights with LED units across all production areas, externally and back rooms. <p>A copy of the Energy Action Plan (uploaded to DMS) was provided upon request - however this is insufficient as it does not demonstrate a plan to become energy efficient and therefore IC9 added as the information provided isn't sufficient with no plan in place.</p>
7	<p>Water and wastewater minimisation</p> <p>In order to reduce water consumption and the volume of waste water discharged, BAT is to use BAT 7a and one or a combination of the techniques b to k given below.</p> <p>(a) water recycling and/or reuse</p>	CC	<p>The Operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 7.</p>

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) 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		Opportunities to further recover and reuse rinse water within the process have been identified and will be reviewed regularly as part of the Greencore Business Improvement programme. The operator has confirmed they implement the following water minimisation activities: <ul style="list-style-type: none"> • The site operates a “Clean as You Go” policy and where possible SOPs prescribe dry cleaning techniques which is subject to process confirmation within each area • Cleaning equipment is carried out to prevent product hardening through hygiene operations for specific equipment and as part of the “Clean as You Go” policy • Foaming systems are employed to allow more controlled dosing of chemicals and a reduction in rinse water • Cold waterpower washers are employed within specific areas of the site where applicable and in accordance with food safety.
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 site is in partnership with specialist third party advisors (Holchem), the site has identified the range and application of cleaning chemicals that are appropriate. CIP systems, plus other chemicals that are used for hygiene, water, and effluent treatment. Group has single source providers of hygiene chemicals

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 other chemical consumables required by site) covering all operations from a specialist supplier. The Group procured Service Level Agreement that requires the provider to identify, agree and only deploy chemicals that have been selected for their efficiency and safety from a technical, health and safety and environmental harm perspective.
9	<p>Refrigerants</p> <p>In order to prevent emissions of ozone-depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential.</p>	CC	<p>The Operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 9.</p> <p>The operator has provided an inventory of refrigeration systems. Some systems associated with the manufacturing process use refrigerants with high GWP.</p> <p>Plans are in place to remove R22 and R404A by the end of FY2025-2026 and remove R422D, R407F and R410A by the end of FY2026-2027.</p> <p>The inventory includes details of the plant age, whether they are appropriate to be retro filled with lower GWP alternative and the associated cost. The inventory is also used to report equipment maintenance frequency and gas losses/charge per calendar year. Losses are reported and accounted for by the wider Greencore Group.</p>
10	<p>Resource efficiency</p> <p>In order to increase resource efficiency, BAT is to use one or a combination of the techniques given below:</p> <p>(a) Anaerobic digestion</p> <p>(b) Use of residues</p>	CC	<p>The Operator has provided information to support compliance with BATc 10. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 10.</p>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
	(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		The site continuously reviews options with respect to re-using residues. For some materials it is not currently feasible to achieve reliable segregation from other waste streams that may contain animal by products. It is essential that an in-depth review and sufficient trialling is carried out to ensure compliance and to manage the likelihood of contamination. Effluent sludge and food waste are sent off site for energy recovery via AD plant.
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. Site prevents un-controlled emissions by using a combination of control measures: These include management controls combined with instrumentation and specifically designed equipment for the nature of the risks posed on site. Site has one x 80 m3 buffer tanks to contain trade effluent on site prior to discharge, including an influent reception sump (circa 15 m3). See BAT 11 Supporting Document v3.
12	Emissions to water – treatment In order to reduce emissions to water, BAT is to use an appropriate combination of the techniques given below. Preliminary, primary and general treatment (a) Equalisation (b) Neutralisation (c) Physical separate (eg screens, sieves, primary settlement tanks etc) Aerobic and/or anaerobic treatment (secondary treatment)	CC	The Operator has provided information to support compliance with BATc 12. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 12. Site Trade Effluent discharge is via consent through Anglian Water.

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement										
	(d) Aerobic and/or anaerobic treatment (eg activated sludge, aerobic lagoon etc) (e) Nitrification and/or denitrification (f) Partial nitrification - 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		There is an on-site Effluent Treatment Plant at Greencore Spalding. The site ETP consists of; <ul style="list-style-type: none"> • Equalisation to smooth out the effluent characteristics through use of buffer tanks and inlet drainage sump (see attached ETP schematic) • Neutralisation via acid/alkali addition • Physical separation via a 4mm static screen Precipitation of solids & FOGs via on-site DAF cells • Coagulation & flocculation is achieved via DAF technology 										
12	Emissions to water – treatment BAT-associated emission levels (BAT-AELs) for direct emissions to a receiving water body <table border="1" data-bbox="282 884 1211 1082"> <thead> <tr> <th>Parameter</th> <th>BAT-AEL (°) (°) (daily average)</th> </tr> </thead> <tbody> <tr> <td>Chemical oxygen demand (COD) (°) (°)</td> <td>25-100 mg/l (°)</td> </tr> <tr> <td>Total suspended solids (TSS)</td> <td>4-50 mg/l (°)</td> </tr> <tr> <td>Total nitrogen (TN)</td> <td>2-20 mg/l (°) (°)</td> </tr> <tr> <td>Total phosphorus (TP)</td> <td>0,2-2 mg/l (°)</td> </tr> </tbody> </table>	Parameter	BAT-AEL (°) (°) (daily average)	Chemical oxygen demand (COD) (°) (°)	25-100 mg/l (°)	Total suspended solids (TSS)	4-50 mg/l (°)	Total nitrogen (TN)	2-20 mg/l (°) (°)	Total phosphorus (TP)	0,2-2 mg/l (°)	NA	The site discharges process effluent to the foul sewer, there are no direct discharges to the water course, as such BAT-AELs do not apply. We are therefore satisfied that BAT AELs associated with BATc 12 is not applicable for this site.
Parameter	BAT-AEL (°) (°) (daily average)												
Chemical oxygen demand (COD) (°) (°)	25-100 mg/l (°)												
Total suspended solids (TSS)	4-50 mg/l (°)												
Total nitrogen (TN)	2-20 mg/l (°) (°)												
Total phosphorus (TP)	0,2-2 mg/l (°)												
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: <ul style="list-style-type: none"> - a protocol containing actions and timelines; - a protocol for conducting noise emissions monitoring; - a protocol for response to identified noise events, eg complaints; 	NA	The Operator has provided information relating BATc 13. A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There have been no substantiated noise nuisance from the site therefore an NMP is not a requirement for this site.										

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
	- 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.		We are therefore satisfied that BATc 13 is not applicable for this site.
14	<p>Noise management</p> <p>In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to use one or a combination of the techniques given below.</p> <p>(a) Appropriate location of equipment and buildings</p> <p>(b) Operational measures</p> <p>(c) Low-noise equipment</p> <p>(d) Noise control equipment</p> <p>(e) Noise abatement</p>	CC	<p>The Operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the Operator has demonstrated compliance with BATc 14.</p> <p>The operator has stated the following considerations related to noise:</p> <ul style="list-style-type: none"> • All installed and commissioned plant and equipment is inspected and maintained under planned preventative maintenance in line with supplier. • Equipment performance is part of the procurement specification which considers the use and applicability of low noise equipment or equipment enclosure. • The design of any new plant will include features to reduce plant noise leakage, sound suppression to external equipment and quiet fan assemblies
15	<p>Odour Management</p> <p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> - a protocol containing actions and timelines; - a protocol for conducting odour monitoring. - a protocol for response to identified odour incidents eg complaints; 	NA	<p>The Operator has provided information relating BATc 15.</p> <p>An odour management plan is only required where odour nuisance at sensitive receptors is expected or has been substantiated. There have been no substantiated odour nuisance from the site therefore an OMP is not a requirement for this site.</p> <p>We are therefore satisfied that BATc 15 is not applicable for this site.</p>

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
	- 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.		

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

Updating permit during permit review consolidation

- Activity name
- Introductory note
- Site plan
- Table S1.1 overhaul
 - Activity Reference (AR) renumbering
 - Updated listed activities
 - Addition of production capacity
 - Directly associated activities (DAAs) standardisation

We have updated permit conditions to those in the current generic permit template as a part of permit consolidation. The conditions will provide the same level of protection as those in the previous permit.

Production/Capacity Threshold

The Environment Agency is looking to draw a “line in the sand” for permitted production capacity; a common understanding between the Operator and regulator for the emissions associated with a (maximum) level of production, whereby the maximum emissions have been demonstrated as causing no significant environmental impact.

We have included a permitted production level (capacity) within table S1.1 of the permit for the section 6.8 listed activity and we need to be confident that the level of emissions associated with this production level have been demonstrated to be acceptable.

The Operator has completed a H1 assessment of emissions for typical figures of production at the time of permitting. The Operator’s stated production capacity is 382 tonnes per day.

The existing H1 assessment of particulate emissions to air remains valid for the revised capacity threshold now placed within table S1.1 of the permit.

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.

Implementing the requirements of the Medium Combustion Plant Directive

Existing small combustion plant (<1MW)

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

Existing Medium Combustion Plant (1MW-50MW)

We asked the Operator to provide information on all combustion 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 table(s) below:

Boilers

1. Rated thermal input (MW) of the medium combustion plant.	Steam Boiler 1 – 1.4 MWth Steam Boiler 2 – 1.6 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Steam Boiler 1 – Robey Lincoln Steam Boiler 2 – Babcock Wanson
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	100% 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.	Steam Boiler 1 – Jan 1990 Steam Boiler 2 – Aug 2015

We have reviewed the information provided and we consider that the declared combustion plant 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.

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.

We agree with the Operators justification and proposed route as the best option for the installation.

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 [Greencore Spalding SCR Review] 01/12/2022. 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.

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 confirmed there has been no change in the hazardous substances used, their capability of causing pollution and/or the pollution prevention measures at the installation since the risk assessment was submitted on 01/12/2022.

Consequently, we are satisfied there has been no change to the assessment of risk for hazardous substances.

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 stated that the installation is not likely to be or has previously not been affected by climate change.

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 applicable.

The Operator provided of all tanks;

- Tank reference/name
- Contents details
- Capacity (litres)
- Location
- Construction material(s) of each tank
- The bunding specification including
 - Whether the tank is banded
 - 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 banded areas
- Tank filling/emptying mitigation measures (drips/splashes)
- Leak detection measures
- Details of when last bund integrity test was carried out
- Maintenance measures in place for tank and bund (inspections)
- How the bund is emptied
- Details of tertiary containment

and whether the onsite tanks currently meet the relevant standard in the Ciria “Containment systems for the prevention of pollution (C736)” report.

We reviewed the information provided by the Operator. We are satisfied that the existing tanks and containment measures on site meet the standards set out in CIRIA C736.

Annex 3: Improvement Conditions

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

Previous improvement conditions marked as complete in the previous permit.

Superseded Improvement Conditions – Removed from permit as marked as “complete”	
Reference	Improvement Condition
IC1	<p>The operator shall submit a written plan to the Environment Agency for approval that includes: Proposals to undertake representative monitoring of point source air emissions listed in table S3.1. The proposals shall include the following monitoring requirements;</p> <ul style="list-style-type: none"> • The emission points that are to be monitored; • Monitoring for oxides of nitrogen and carbon monoxide; • Monitoring frequency; • Reference period; and • Methods to be used. <p>Monitoring shall be either MCerts certification or MCerts accreditation, where available, and test standards shall be standards referenced in Technical Guidance note (monitoring) M2 Monitoring of stack emissions to air.</p>
IC2	<p>The operator shall submit a written plan to the Environment Agency for approval that includes; an air dispersion modelling assessment that includes the point source air emissions data obtained in IC1 above. Your air quality assessment shall be comprised of a written report and model data input files in line with the requirements of the Environment Agency's web guidance; https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit</p> <p>Should the air dispersion modelling determine that emissions are 'significant', submit a written proposal for appropriate mitigation measures to the Environment Agency for approval. Your proposal shall contain a description of the appropriate measure, emission limits, monitoring frequencies and methods. It shall also specify dates for implementation of individual measures.</p>
IC3	<p>The operator shall provide a revised accident management plan to the Environment Agency for approval. For each potential incident, the accident management plan shall state:</p> <ul style="list-style-type: none"> • The likelihood of the accident happening. • Consequences of the accident happening. • Measures taken to avoid the accident happening. • Measures you'll take to minimise the impact if the accident does happen. <p>The revised accident management plan shall meet the requirements specified in the section, Accident prevention and management plan as specified in the Environment Agency's web guidance, Develop a management system: environmental permits and How to comply with your environmental permit. Additional guidance for: The Food and Drink Sector (EPR 6.10).</p>
IC4	<p>The operator shall undertake a survey to determine the integrity, adequacy and suitability of site hardstanding, kerbing and secondary containment for above-ground tanks and the measures to comply with the requirements of</p>

	<p>the Food and Drink Technical Guidance Note (EPR 6.10), CIRIA 736 and any other relevant industry standard.</p> <p>A written report summarising the survey, proposals for improvements and a timescale for implementation of any improvements shall be submitted to the Environment Agency for review and comment. The operator shall implement any improvements in accordance with the Environment Agency's comments.</p>
IC5	<p>The operator shall submit a written odour management plan to the Environment Agency for approval. The plan shall incorporate all the required detailed information as specified in the Environment Agency's guidance, How to comply with your environmental permit. Additional guidance for: The Food and Drink Sector (EPR 6.10) and Horizontal Guidance H4 – Odour Management.</p> <p>Including but not restricted to the following sections:</p> <ul style="list-style-type: none"> • Details of sensitive receptors (dwellings and workplaces). • A map showing the installation in relation to the sensitive receptors. • Odour sources. • Odour pathways. • Odour management and control measures. • Process monitoring of potentially odorous sources. • Odour complaints procedure. • Odour monitoring. • Community engagement. • Abnormal operations and contingency measures.
IC6	<p>The Operator shall carry out a water efficiency audit of the installation. The audit shall have regard to the Environment Agency Guidance 'How to Comply with your Environmental Permit', and shall provide a breakdown of significant water use by department or activity and shall establish the current installation performance (for example litre water/kg of product) and water efficiency objectives for this installation. It shall also explore opportunities for the recycling and reuse of water.</p> <p>A summary of the audit shall be sent to the Environment Agency for approval in writing. This shall include any deficiencies identified, the improvements proposed and the timescale for implementation.</p>

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

Improvement programme requirements		
Reference	Reason for inclusion	Justification of deadline
IC7	<p>The operator shall submit a written post-commissioning report to the Environment Agency for assessment and written approval.</p> <p>The report must contain:</p> <ul style="list-style-type: none"> • A review of the environmental performance of the facility against the design parameters set out in the Application; • A review of the performance of the facility against the conditions of the permit and the pre-commissioning report proposals; • Details of the procedures developed during commissioning for achieving and demonstrating compliance with permit conditions; • A revised accident management plan to incorporate the changes to the site infrastructure; and 	<p>Within 4 months of the completion of commissioning</p>

	<ul style="list-style-type: none"> • A revised spill kit response plan to incorporate the changes to the site infrastructure. <p>The operator must implement the proposals in the report as confirmed by the Environment Agency.</p>	
IC8	<p>The operator shall submit a written report to the Environment Agency for written confirmation.</p> <p>The report must contain:</p> <ul style="list-style-type: none"> • Evidence that a survey has been conducted to determine the integrity, adequacy and suitability of the impermeable surface and secondary containment for the existing below ground effluent pit (reception pit). • Evidence that the structure meets the appropriate standard in line with CIRIA C736. <p>The operator must implement the proposals in the report as confirmed by the Environment Agency.</p>	3 months from the issuing of the permit variation or as otherwise agreed by the Environment Agency.
IC9	<p>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:</p> <ul style="list-style-type: none"> • Methodology applied for achieving BAT • Demonstrating that BAT has been achieved. <p>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.</p>	3 months from the issuing of the permit variation or as otherwise agreed by the Environment Agency.