

# Notice of variation and consolidation with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

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Unilever UK Limited

Burton on Trent Food Manufacturing Plant  
Burton on Trent  
Wellington Road  
Burton on Trent  
DE14 2AB

## **Variation application number**

EPR/QP3634FB/V004

## **Permit number**

EPR/QP3634FB

# Burton on Trent Food Manufacturing Plant

## Permit number EPR/QP3634FB

### 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.

This variation is an administrative variation to update the permit to the latest permit template following the issuing of the Food, Drink and Milk Industries published on 4th December 2019 in the official journal of the European Union.

The schedules specify the changes made to the 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.

We consider that in reaching our decision to vary the permit we have taken into account all relevant considerations and legal requirements. We are satisfied that the permit will ensure that a high level of protection is provided for the environment and human health and that the activities will not give rise to any significant pollution of the environment or harm to human health.

The main features of the permit are as follows.

The installation is located on a commercial estate off Wellington Road, Burton on Trent approximately 18km south west of Derby. The site is centred on NGR SK 23319 22643. The site manufactures various savoury food products, sauces and condiments. The site operates under the following listed activities:

- Section 6.8 Part A(1)(d)(iii)(bb)  
*Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging)— animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than (bb)  $300 - (22.5 \times A)$  in any other case, where 'A' is the portion of animal material in percent of weight of the finished product production capacity.*
- Section 5.4 Part A(1) (b)(i)  
*Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC—concerning urban waste-water treatment.*

The installation area has increased in size to include the process buildings, warehouses and other industrial infrastructure, the site now covers approximately 6.6 hectares. The site is predominantly surfaced with concrete hard standing with a single discharge to surface water. Surface and rain water originating from the east of the site is discharged via an interceptor to an unnamed brook which is culverted beneath the site (W1). This area of the site is only used for vehicular movements. Surface water originating on the rest of the site is discharged directly to sewer via emission point S2 and S3. The onsite AD plant which includes the EGSB digester (expanded granular sludge bed digestion) and AMBR tank (Advanced Membrane Bioreactor)) processes yeast waste water from the yeast extraction process. The process produces treated effluent which is discharged to sewer via emission point S1 and biogas. The biogas is stored in a gas sphere and used in two of the onsite gas boilers as fuel. A flare is present to allow flaring in the event of abnormal conditions in the biogas combustion system. The onsite DAF plant receives waste water from other onsite

production processes, the treated effluent is discharged to sewer via emission point S1 and the sludge waste is removed from site for disposal. The discharge to sewer is covered by a trade effluent consent from Severn Trent.

The installation has two boilers which operate on a combination of gas produced by the AD plant and natural gas with a thermal input of 9.5MWth and a third boiler which operates on natural gas with a thermal input of 9.5MWth. All of the boilers are classified as existing Medium Combustion Plant.

As of 04 September 2023, the registered address for Unilever (UK) Limited, registered with Companies House under company number 00334527, changed from Unilever House Springfield Drive Leatherhead KT22 7GR to Lever House 3 St James Road Kingston upon Thames KT1 2BA. The legal entity, identified by the company number remains the same, therefore this change is noted within this variation as a change of fact only.

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

| <b>Status log of the permit</b>  |                         |   |
|--|-------------------------|---|
| <b>Description</b>   | <b>Date</b>             | <b>Comments</b>   |
| Application<br>EPR/QP3634FB/A001   | Duly made<br>26/09/2011 | Application for installation and waste operation.   |
| Additional information received  | 26/09/2011              | Confirmation of site boundary.  |
| Permit Issued  | 11/11/2011              | Permit issued   |
| Agency variation determined<br>EPR/QP3634FB /V002                                      | 03/04/2013              | Agency variation to implement the changes introduced by IED   |
| Application<br>EPR/QP3634FB/V004<br>(variation and consolidation)                      | Duly made<br>29/01/2021 | Application to add a listed schedule activity, addition of the DAF plant, air emission point for the new root mill, increase in permit boundary and update the permit to modern conditions.                             |
| Response to Schedule 5 Notice<br>dated 29/03/2021                                      | 25/05/2021              | Response to Schedule 5 Notice including <ul style="list-style-type: none"> <li>• Accident/incident management plan and associated appendices.</li> <li>• Revised BAT assessment</li> <li>• Updated site plan</li> </ul> |
|  | 18/06/2021              | Response to Schedule 5 Notice including <ul style="list-style-type: none"> <li>• Revised odour management plan</li> </ul>   |
| Variation determined and consolidation issued<br>EPR/QP3634FB<br>(billing ref:ZP005LL) | 20/08/2021              | Varied and consolidated permit issued to Unilever (UK) Limited.   |
| Variation issued<br>EPR/QP3634FB/V004  | 19/11/2024              | Environment Agency initiated variation to update to the latest permit template  |

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/QP3634FB

### Issued to

**Unilever UK Limited** (“the operator”)

whose registered office is

**Lever House  
3 St James Road  
Kingston Upon Thames  
United Kingdom  
KT1 2BA**

company registration number 00334527

to operate a regulated facility at

**Burton on Trent Food Manufacturing Plant  
Burton on Trent  
Wellington Road  
Burton on Trent  
DE14 2AB**

to the extent set out in the schedules.

The notice shall take effect from 19/11/2024

| Name          | Date       |
|---------------|------------|
| Denise Horton | 19/11/2024 |

Authorised on behalf of the Environment Agency

## **Schedule 1**

The following conditions were varied as a result of an Environment Agency initiated variation:

Table S1.3 as referenced in condition 2.4.1 has been updated with Improvement Conditions (IC) 6, 7, 8 and 9 marked as complete.

Table S4.3 as referenced in condition 4.2.2 (c) has been updated to include two new performance parameters; 'COD loss efficiency' and 'Food Waste'.

Table S4.4 as referenced in conditions 4.2.2 (c) and 4.2.3 (b) has been updated to include a new reporting form titled 'Food Waste'.

Schedule 6 as referenced in condition 4.4.1 has been updated to include a new definition 'Food Waste'.

## **Schedule 2 – consolidated permit**

Consolidated permit issued as a separate document.

# Permit

## The Environmental Permitting (England and Wales) Regulations 2016

### Permit number

**EPR/QP3634FB**

This is the consolidated permit referred to in the variation and consolidation notice for application EPR/QP3634FB/V004 authorising,

**Unilever UK Limited** (“the operator”),

whose registered office is

**Lever House  
3 St James Road  
Kingston Upon Thames  
United Kingdom  
KT1 2BA**

company registration number 00334527

to operate an installation at

**Burton on Trent Food Manufacturing Plant  
Burton on Trent  
Wellington Road  
Burton on Trent  
DE14 2AB**

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

| <b>Name</b>          | <b>Date</b>       |
|----------------------|-------------------|
| <b>Denise Horton</b> | <b>19/11/2024</b> |

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 red on the site plan at schedule 7 to this permit.

### **2.3 Operating techniques**

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

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

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

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

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

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

### **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 S3.1a, S3.1b, 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.

## **3.4 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 S3.1a, S3.1b, 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 S3.1a, S3.1b, S3.2 and S3.3 unless otherwise agreed in writing by the Environment Agency.

## **3.6 Pests**

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

## **4 Information**

### **4.1 Records**

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

### **4.2 Reporting**

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.

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

## 4.3 Notifications

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

4.3.4 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.

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

4.3.6 Where the operator has entered into a climate change agreement with the Government, the Environment Agency shall be notified within one month of:

- (a) a decision by the Secretary of State not to re-certify the agreement;
- (b) a decision by either the operator or the Secretary of State to terminate the agreement; and
- (c) any subsequent decision by the Secretary of State to re-certify such an agreement.

## **4.4 Interpretation**

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

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

# Schedule 1 – Operations

| Table S1.1 activities                               |  |  |
|---|--|--|
| Activity listed in Schedule 1 of the EP Regulations | Description of specified activity  | Limits of specified activity   |
| Section 6.8 Part A(1)(d)(iii)(bb)                   | Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging)— animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than (bb) 300-(22.5 x A) in any other case, where 'A' is the portion of animal material in percent of weight of the finished product production capacity. | From receipt of raw materials to storage and dispatch off site.  |
| Section 5.4 Part A(1) (b)(i)                        | Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day (or 100 tonnes per day if the only waste treatment activity is anaerobic digestion) involving one or more of the following activities, and excluding activities covered by Council Directive 91/271/EEC— concerning urban waste-water treatment.   | Collection and treatment of process effluent prior to discharge to sewage undertaker treatment facility and subsequently to sewer.   |
| <b>Directly Associated Activity</b>                 |  |  |
| Combustion  | Operation of boilers to generate steam: <ul style="list-style-type: none"> <li>• 2 x c.9.5MWth boilers located in a boiler house, fired on a mixture of AD biogas and natural gas (existing medium combustion plant).</li> <li>• 1 x c.9.5MWth boiler located in a boiler house, fired on natural gas (existing medium combustion plant).</li> </ul>   | From receipt of fuel to generation of steam. Only two boilers operational at any one time.   |
| DAF plant   | Operation of the effluent treatment plant for the control of releases to sewer.  | Collection and treatment of process effluent prior to discharge to sewage undertaker treatment facility and subsequently to sewer.<br><br>Collection of solids from the DAF plant to transport off-site (for recovery in a bio-digester to create energy). |
| Product and outputs                                 | Storage, handling and despatch of finished products.   | From receipt of finished products and wastes to dispatch off-site.   |
| Waste and by-product storage                        | Storage of waste and by-products from the installation.  | From receipt of waste and by-products to recovery off-site.  |
| Cleaning  | Cleaning in Place (CIP).   | Cleaning of plant associated with the food produce effluent- AD and DAF plants.  |

| <b>Table S1.1 activities</b>      |   |   |
|-----------------------------------|---|---|
| Refrigeration                     | Operation of gas filled chillers, fridges and cooled incubators for produce storage and gas filled A/C units in office rooms. | The storage and handling of refrigerants and operation of gas filled refrigeration/cooling rooms. |
| Flaring of biogas                 | Operation of the biogas flare.  | Use of auxiliary flare in periods of low pressure.  |
| Chemical and raw material storage | Storage of chemicals and raw materials including feedstock and caustic soda.  | From receipt of chemicals and raw materials to their use in the process.                          |
| Centrifuged digestate storage     | Storage of centrifuged digestate.   | From storage of digestate to despatch for use off site.   |
| Sludge Storage                    | Storage of sludge from EGSB tank.   | From storage of sludge to despatch off site.  |
| Chemical scrubbing                | Biogas scrubber within the AD plant.  | From receipt of biogas to reduction in hydrogen sulphide level.                                   |

| <b>Table S1.2 Operating techniques</b>         |  |                      |
|--|--|----------------------|
| <b>Description</b>                             | <b>Parts</b>   | <b>Date Received</b> |
| Application                                    | Part B2 of the application document in response to section 3a,b,c, also section 6 and 7.<br>Part B3 of the application document in response to section 1-6 inclusive.<br>Part B4 of the application document in response to section 1-4 inclusive. | 03/08/2011           |
| Further information request 10/10/2011         | Information request re: use of biogas, running hours, pre-treatment of feedstock, treatment in conditioning tank , size of boilers, stacks and typical running of boilers  | 14/10/2011           |
| Further information request 17/10/2011         | Information request re WAMITAB and EPOC qualifications and advice  | 17/10/2011           |
| Further information request 19/10/2011         | Information re bunding of AD plant   | 19/10/2011           |
| Further information request 27/10/2011         | Information re point source emission locations and sludge storage tank location,   | 01/11/2011           |
| Further information request 04/11/2011         | New installation boundary plan submitted   | 04/11/2011           |
| Variation application EPR/QP3634FB/V003        | Parts C2 and C3 of the application and all referenced supporting information.  | Duly Made 29/01/2021 |
| Response to Schedule 5 Notice dated 29/03/2021 | Response to Schedule 5 Notice <ul style="list-style-type: none"> <li>• Accident/incident Management Plan and associated appendices.</li> <li>• Update site plan</li> <li>• BAT Assessment</li> </ul>   | 25/05/2021           |
|  | <ul style="list-style-type: none"> <li>• Revised odour management plan</li> </ul>  | 18/06/2021           |

| <b>Table S1.3 Improvement programme requirements</b> |   |                    |
|--|---|--------------------|
| <b>Reference</b>                                     | <b>Requirement</b>  | <b>Date</b>        |
| IC1  | The operator shall submit a copy of the full feasibility study undertaken on their behalf to install a CHP plant burning only biogas from the anaerobic digestion plant. The results of which will be assessed by the Agency for approval and agreement.  | No longer required |
| IC2  | The operator shall submit a plan for the approved design and build of the CHP plant, the plan should include a schedule of works and completion date, to be approved and agreed by the Agency.  | No longer required |
| IC3  | With respect to either of the above, IC1 and/or IC2 not being met; the Operator will submit a plan to the Agency on how they intend to comply with agency guidance particularly, but not restricted to, sections 1, 2 and 3 of How to comply with your EPR permit EPR1.0.   | No longer required |
| IC4  | The Operator shall develop a written odour management plan having regard to the requirements set out in H4, Guidance document H4 Odour Management – How to comply with your environmental permit (April 2011) and shall submit the plan in writing to the Agency.   | Complete           |
| IC5  | The Operator shall develop a written noise management plan having regard to the requirements set out in H3, Guidance document Part 2 Noise assessment and control – How to comply with your environmental permit (April 2011) and shall submit the plan in writing to the Agency.   | No longer required |
| IC6  | <p>The operator shall submit a written ‘primary containment plan’ and shall obtain the Environment Agency’s written approval to it. The plan shall contain the results of a review conducted, by a competent person, and shall compare the design specification of primary containment systems where all polluting liquids and solids are being stored, treated, and/or handled against the design standards within CIRIA C535 guidance or equivalent.</p> <p>The review shall include:</p> <ul style="list-style-type: none"> <li>• physical condition of all primary containment systems (storage and treatment vessels);</li> <li>• the suitability for providing primary containment when subjected to the dynamic and static loads caused by the vessels’ contents;</li> <li>• any work required to ensure compliance with the standards set out in CIRIA C535 or equivalent; and</li> <li>• a preventative maintenance and inspection regime</li> </ul> <p>The plan must contain dates for the implementation of individual improvement measures necessary for the primary containment to adhere to the standards detailed/referenced within CIRIA C535 guidance, or equivalent.</p> <p>The plan shall be implemented in accordance with the Environment Agency’s written approval.</p> | Complete           |
| IC7  | <p>The operator shall submit a written ‘secondary and tertiary containment plan’ and shall obtain the Environment Agency’s written approval to it. The plan shall contain the results of a review conducted, by a competent person, in accordance with the risk assessment methodology detailed within CIRIA C736 (2014) guidance, of the condition and extent of secondary and tertiary containment systems where all polluting liquids and solids are being stored, treated, and/or handled.</p> <p>The review shall consider, but not limited to, the storage vessels, bunds, loading and unloading areas, transfer pipework/pumps, temporary storage areas, and liners underlying the site.</p>   | Complete           |

| <b>Table S1.3 Improvement programme requirements</b> |  |             |
|--|--|-------------|
| <b>Reference</b>                                     | <b>Requirement</b>   | <b>Date</b> |
|  | <p>The plan must contain dates for the implementation of individual improvement measures necessary for the secondary and tertiary containment systems to adhere to the standards detailed/referenced within CIRIA C736 (2014) guidance, or equivalent.</p> <p>The plan shall be implemented in accordance with the Environment Agency's written approval.</p>  |             |
| IC8  | <p>The Operator shall submit a written 'intrusive phase II site investigation report' and shall obtain the Environment Agency's written approval to it. The report shall contain the baseline conditions of soil and groundwater at the installation. In addition the report shall contain the information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definitive cessation of activities provided for in Article 22(3) of the IED. The report shall contain information, supplementary to that already provided in application Site Condition Report, needed to meet the information requirements of Article 22(2) of the IED.</p> | Complete    |
| IC9  | <p>The Operator shall ensure that the onsite boreholes have been appropriately decommissioned to ensure there can be no contamination of the groundwater from onsite activities. Evidence of the decommissioned boreholes shall be provided to the Environment Agency in writing for approval.</p>   | Complete    |



## 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 S3.1a Point source emissions to air – emission limits and monitoring requirements until 31/12/2024 |  |   |                        |                  |                      |  |
|--|--|---|------------------------|------------------|----------------------|--|
| Emission point ref. & location   | Source   | Parameter   | Limit (including unit) | Reference period | Monitoring frequency | Monitoring standard or method                                      |
| A1<br>[Point A1 on site plan in Schedule 7]  | Boiler plant fired on biogas and natural gas (9.5MWth) | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 500mg/m <sup>3</sup>   | Hourly average   | Annually             | BS EN 14792  |
|  |  | Sulphur dioxide   | 350mg/m <sup>3</sup>   |                  |                      | BS EN 14791  |
|  |  | Carbon monoxide   | 1,400mg/m <sup>3</sup> |                  |                      | BS EN 15058  |
|  |  | Total Volatile Organic Compounds  | 1,000mg/m <sup>3</sup> |                  |                      | BS EN 12619:19999 or BS EN 13526:2002 depending upon concentration |
| A2<br>[Point A2 on site plan in Schedule 7]  | Boiler plant fired biogas and natural gas (9.5MWth)    | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 500mg/m <sup>3</sup>   | Hourly average   | Annually             | BS EN 14792  |
|  |  | Sulphur dioxide   | 350mg/m <sup>3</sup>   |                  |                      | BS EN 14791  |
|  |  | Carbon monoxide   | 1,400mg/m <sup>3</sup> |                  |                      | BS EN 15058  |
|  |  | Total Volatile Organic Compounds  | 1,000mg/m <sup>3</sup> |                  |                      | BS EN 12619:19999 or BS EN 13526:2002 depending upon concentration |
| A3<br>[Point A3 on site plan in Schedule 7]  | Boiler plant fired on natural gas (9.5MWth)            | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 500mg/m <sup>3</sup>   | Hourly average   | Annually             | BS EN 14792  |
|  |  | Sulphur dioxide   | 350mg/m <sup>3</sup>   |                  |                      | BS EN 14791  |
|  |  | Carbon monoxide   | 1,400mg/m <sup>3</sup> |                  |                      | BS EN 15058  |

| <b>Table S3.1a Point source emissions to air – emission limits and monitoring requirements until 31/12/2024</b> |  |   |                               |                         |                             |  |
|---|--|---|-------------------------------|-------------------------|-----------------------------|--|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>                          | <b>Parameter</b>  | <b>Limit (including unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b>                               |
|   |  | Total Volatile Organic Compounds  | 1,000mg/m <sup>3</sup>        |                         |                             | BS EN 12619:19999 or BS EN 13526:2002 depending upon concentration |
| A4<br>[Point A4 on site plan in Schedule 7]   | Horseradish root mill                  | No parameter set  | No limit set                  | -                       | -                           | -  |
| A5<br>[Point A5 on site plan in Schedule 7]   | Biogas flare                           | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                  | -                       | -                           | -  |
|   |  | Carbon monoxide   | No limit set                  | -                       | -                           | -  |
| A6<br>[Point A6 on site plan in Schedule 7]   | Biogas hydrogen sulphide scrubber vent | No parameter set  | No limit set                  | -                       | -                           | -  |
| A7<br>[Point A7 on site plan in Schedule 7]   | AD carbon filter vent                  | No parameter set  | No limit set                  | -                       | -                           | -  |
| A8<br>[Point A8 on site plan in Schedule 7]   | EGSB reactor – pressure relief valve   | No parameter set  | No limit set                  | -                       | -                           | -  |

| <b>Table S3.1b Point source emissions to air – emission limits and monitoring requirements from 01/01/2025</b> |  |   |                                       |                         |                             |                                      |
|--|--|---|---------------------------------------|-------------------------|-----------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>  | <b>Source</b>  | <b>Parameter</b>  | <b>Limit (including unit)</b>         | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
| A1<br>[Point A1 on site plan in Schedule 7]  | Boiler plant fired on biogas and natural gas (9.5MWth) | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | X mg/m <sup>3</sup> <sup>Note 1</sup> | Hourly average          | Annually                    | BS EN 14792                          |
|  |  | Sulphur dioxide   | 170mg/m <sup>3</sup>                  |                         |                             | BS EN 14791                          |
|  |  | Carbon monoxide   | 1,400mg/m <sup>3</sup>                |                         |                             | BS EN 15058                          |

**Table S3.1b Point source emissions to air – emission limits and monitoring requirements from 01/01/2025**

| Emission point ref. & location              | Source   | Parameter   | Limit (including unit)      | Reference period | Monitoring frequency | Monitoring standard or method                                      |
|---|--|---|-----------------------------|------------------|----------------------|--|
|   |  | Total Volatile Organic Compounds  | 1,000mg/m <sup>3</sup>      |                  |                      | BS EN 12619:19999 or BS EN 13526:2002 depending upon concentration |
| A2<br>[Point A2 on site plan in Schedule 7] | Boiler plant fired on biogas and natural gas (9.5MWth) | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | X mg/m <sup>3</sup> Note 1  | Hourly average   | Annually             | BS EN 14792  |
|   |  | Sulphur dioxide   | 170mg/m <sup>3</sup>        |                  |                      | BS EN 14791  |
|   |  | Carbon monoxide   | 1,400mg/m <sup>3</sup>      |                  |                      | BS EN 15058  |
|   |  | Total Volatile Organic Compounds  | 1,000mg/m <sup>3</sup>      |                  |                      | BS EN 12619:19999 or BS EN 13526:2002 depending upon concentration |
| A3<br>[Point A3 on site plan in Schedule 7] | Boiler plant fired on natural gas (9.5MWth)            | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | 200mg/m <sup>3</sup> Note 1 | Hourly average   | Annually             | BS EN 14792  |
|   |  | Carbon monoxide   | 1,400mg/m <sup>3</sup>      |                  |                      | BS EN 15058  |
| A4<br>[Point A4 on site plan in Schedule 7] | Horseradish root mill                                  | No parameter set  | No limit set                | -                | -                    | -  |
| A5<br>[Point A5 on site plan in Schedule 7] | Biogas flare   | Oxides of Nitrogen (NO and NO <sub>2</sub> expressed as NO <sub>2</sub> ) | No limit set                | -                | -                    | -  |
|   |  | Carbon monoxide   | No limit set                | -                | -                    | -  |
| A6<br>[Point A6 on site plan in Schedule 7] | Biogas hydrogen sulphide scrubber vent                 | No parameter set  | No limit set                | -                | -                    | -  |

| <b>Table S3.1b Point source emissions to air – emission limits and monitoring requirements from 01/01/2025</b> |                                      |                  |                               |                         |                             |                                      |
|--|--------------------------------------|------------------|-------------------------------|-------------------------|-----------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>  | <b>Source</b>                        | <b>Parameter</b> | <b>Limit (including unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
| A7<br>[Point A7 on site plan in Schedule 7]  | AD carbon filter vent                | No parameter set | No limit set                  | -                       | -                           | -                                    |
| A8<br>[Point A8 on site plan in Schedule 7]  | EGSB reactor – pressure relief valve | No parameter set | No limit set                  | -                       | -                           | -                                    |

Note 1: Emission Limit Value to be calculated as the weighted average between the limits of 200mg/m<sup>3</sup> for natural gas and 250mg/m<sup>3</sup> for biogas, based on the thermal input ratio of natural gas to biogas fed to the boiler.

| <b>Table S3.2 Point Source emissions to water (other than sewer) and land – emission limits and monitoring requirements</b> |  |                  |                           |                         |                             |                                      |
|---|--|------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>   | <b>Source</b>                                  | <b>Parameter</b> | <b>Limit (incl. unit)</b> | <b>Reference Period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
| W1<br>[Point W1 on site plan in Schedule 7]   | Uncontaminated surface runoff via holding tank | No parameter set | No limit set              | -                       | -                           | -                                    |

| <b>Table S3.3 Point source emissions to sewer, effluent treatment plant or other transfers off-site– emission limits and monitoring requirements</b> |  |                  |                           |                         |                             |                                      |
|--|--|------------------|---------------------------|-------------------------|-----------------------------|--------------------------------------|
| <b>Emission point ref. &amp; location</b>  | <b>Source</b>                                      | <b>Parameter</b> | <b>Limit (incl. Unit)</b> | <b>Reference period</b> | <b>Monitoring frequency</b> | <b>Monitoring standard or method</b> |
| S1 [Point S1 on site plan in schedule 7 emission to Severn Trent sewer network]  | Treated effluent from the AD plant & DAF plant     | No parameter set | No limit set              | -                       | -                           | -                                    |
| S2 [Point S2 on site plan in schedule 7 emission to Severn Trent sewer network]  | Flume 2 – surface water to sewer (combined sewer). | No parameter set | No limit set              | -                       | -                           | -                                    |
| S3 [Point S3 on site plan in schedule 7 emission to Severn Trent sewer network]  | Flume 3 – surface water to sewer (combined sewer). | 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.

| <b>Table S4.1 Reporting of monitoring data</b>                                |   |                         |                      |
|---|---|-------------------------|----------------------|
| <b>Parameter</b>  | <b>Emission or monitoring point/reference</b> | <b>Reporting period</b> | <b>Period begins</b> |
| Point source emissions to air<br>Parameters as required by<br>condition 3.5.1 | A1, A2 and A3                                 | Every 12 months         | 1 January            |

| <b>Table S4.2: Annual production/treatment</b> |                   |
|--|-------------------|
| <b>Parameter</b>                               | <b>Units</b>      |
| Biogas production                              | Tonnes            |
| Products produced                              | Tonnes of product |

| <b>Table S4.3 Performance parameters</b> |                                |                   |
|--|--------------------------------|-------------------|
| <b>Parameter</b>                         | <b>Frequency of assessment</b> | <b>Units</b>      |
| Biogas usage                             | Annually                       | Tonnes            |
| Natural gas usage                        | Annually                       | Tonnes            |
| Flare operation                          | Annually                       | Hours             |
| Water usage                              | Annually                       | Tonnes            |
| COD loss efficiency                      | Annually                       | COD te/te product |
| Food waste                               | Annually                       | Tonnes            |

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

| <b>Table S4.4 Reporting forms</b> |   |                                     |
|-----------------------------------|---|-------------------------------------|
| <b>Parameter</b>                  | <b>Reporting form</b>   | <b>Form version number and date</b> |
| Point source emissions to air     | Emissions to Air Reporting Form, or other form as agreed in writing by the Environment Agency             | 20/08/2021                          |
| Point source emissions to sewer   | Emissions to Sewer Reporting Form, or other form as agreed in writing by the Environment Agency           | 20/08/2021                          |
| Water usage                       | Water Usage Reporting Form, or other form as agreed in writing by the Environment Agency                  | 20/08/2021                          |
| Energy usage                      | Energy Usage Reporting Form, or other form as agreed in writing by the Environment Agency                 | 20/08/2021                          |
| Food waste                        | Food waste Reporting Form, or other form as agreed in writing by the Environment Agency                   | 06/02/2023                          |
| Other performance parameters      | Other Performance Parameters Reporting Form, or other form as agreed in writing by the Environment Agency | 20/08/2021                          |

# 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 |  |

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

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

|   |                            |
|---|----------------------------|
| <b>Time periods for notification following detection of a breach of a limit</b> |                            |
| <b>Parameter</b>  | <b>Notification period</b> |
|   |                            |
|   |                            |
|   |                            |

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

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

## **Part B – to be submitted as soon as practicable**

|  |  |
|--|--|
| Any more accurate information on the matters for notification under Part A.  |  |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident   |  |
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission |  |



|   |  |
|---|--|
| The dates of any unauthorised emissions from the facility in the preceding 24 months. |  |
|---|--|

|           |  |
|-----------|--|
| Name*     |  |
| Post      |  |
| Signature |  |
| Date      |  |

\* authorised to sign on behalf of the operator

## Schedule 6 – Interpretation

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

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

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

“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.

“List of Wastes” means the list of wastes established by Commission Decision 2000/532/EC replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste

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

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

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

“Pests” means Birds, Vermin and Insects.

“Waste code” means the six digit code referable to a type of waste in accordance with the List of Wastes and in relation to hazardous waste, includes the asterisk.

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:

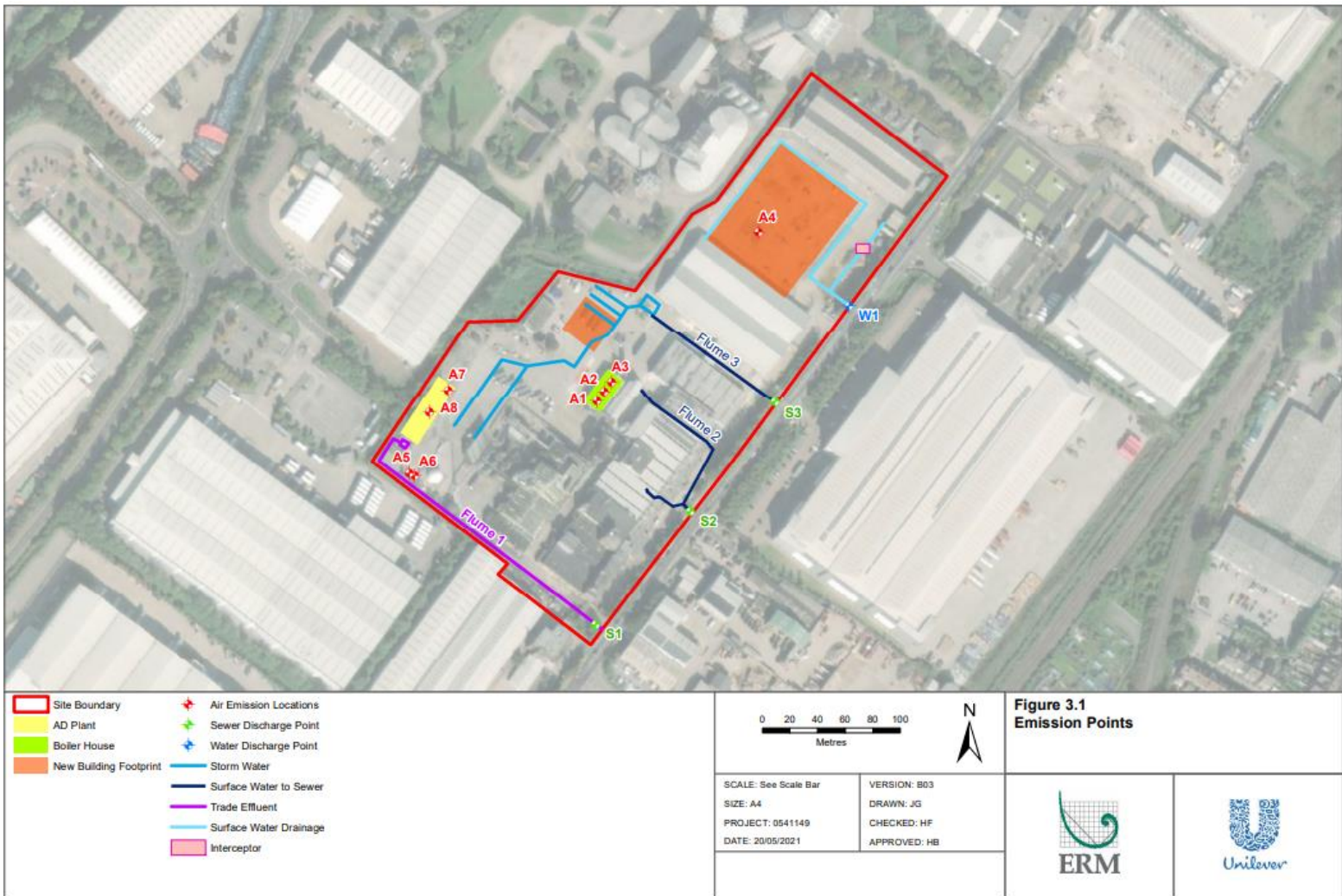
- in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3 kPa and with an oxygen content of 3% dry for liquid and gaseous fuels, 6% dry for solid fuels; and/or

- 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



SOURCE: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNR/SIA/Busca DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Path: Z:\London\Projects\0541149 Consolidated Unilever Unilever Burton Permitting.CBI\Working\05\_GIS\MAPS\0541149\_Emission\_Points\_B03.mxd

END OF PERMIT