

## Permitting decisions- Surrender

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We have decided to accept the surrender of the permit for Easton Food Processors operated by MCCAIN FOODS (G.B.) LIMITED.

The permit number is EPR/ZP3737YZ.

The decision was issued on 18/12/2024

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state. We consider in reaching this decision that we have taken into account all relevant considerations and legal requirements.

### Purpose of this document

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

- highlights [key issues](#) in the determination
- summarises the decision-making process in the [decisions considerations](#) section to show how all relevant factors have been taken into account

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

# Key issues of the decision

## Site setting

The Eastern Food Processors installation is located approximately 8km south of the town of Grantham, Lincolnshire. The centre of the site is at National Grid Reference SK 94031 26840. was part of a larger plant used for production of vegetable-based foodstuffs (French fries) on three production lines. When operational (between first permitting in October 2005 and May 2020 when the main production area ceased operation, the facility produced approximately 400 tonnes of French fries per day (12 tonnes per hour on Line 2, 4.5 tonnes per hour on Line 1 and 0.8 tonnes per hour at the Fries to Go facility), with a raw potato consumption of approximately 680 tonnes of potatoes per day. The site ceased production on 25<sup>th</sup> October 2024.

The following activities were included on the permit,

- Section 6.8 Part A(1)(d)(ii) - Treating and processing materials intended for the production of food from vegetable raw materials at a finished product production capacity greater than 300 tonnes per day.
- Section 5.4 A(1)(a)(i) – Disposal of non-hazardous waste in a facility with a capacity exceeding 50 tonnes per day by biological treatment.

The Section 5.4 A(1)(a)(i) activity was transferred on 02/08/2024 to a new permit EPR/XP3628SM (held by Easton Properties Limited) within the existing installation boundary. The area subject to surrender is mostly covered by the “Fries to Go” (FTG) production building and roadway from the site entrance along the western side of the site and an area of hardstanding to the north of the building. This includes the cooking oil storage associated with the FTG building.

## Condition of the land at permit issue

A SCR (site condition report) wasn't submitted as part of the original permit application, instead a SPMP (site protection and monitoring programme) was submitted on 6<sup>th</sup> September 2006. Four window sample (WS) boreholes were dug across the site, a summary of each is provided below.

### Zone 1 - WSO4

This area was chosen due to visible signs of leaks/spills from the vegetable oil tanks. The ground within the vicinity of the was surfaced with hardstanding to a depth of approximately 0.3m, beneath which a sandy gravelly subbase and further layer of hardstanding was noted, to a total depth of 0.7m bgl. There were no visible or olfactory observations of contamination noted within this borehole. Samples from the borehole indicated low levels of TPH (Total petroleum hydrocarbon) were present, however no fatty acids were detected within the

sample. Fatty acids would have been detected had vegetable oil been present, which would have indicated the origin was from the vegetable oil tank.

#### Zone 2 - WS03

This area was chosen due to visible evidence of leaks /spills within the vicinity of the heavy fuel oil tanks. The SPMP notes that the ground below the tanks was surfaced with 0.3m of concrete hardstanding, beneath which lay made ground comprising of clay with varying proportions of sand and gravel of sandstone and brick to a depth of approximately 2.2 m bgl. Slight odour and small patches of odour were noted within made ground at depths of 0.3 and 0.6 bgl. Samples taken from the borehole were below the limit of detection with the exception of TPH. Concentrations of TPH were detected at a concentration of 850 mg/kg within a sample taken from 0.3-0.6m bgl, carbon banding indicated that they were from diesel/fuel oil origin.

#### Zone 3 – WS02

This area was chosen as there was minor evidence of leaks/spills having occurred in the region from the chemical storage area and a need to assess any potential impacts this may have had on the underlying strata. The SPMP notes that the area was surfaced with concrete hardstanding, which was 0.3m in thickness beneath which lay approximately 0.5m of made ground comprising of sandy gravel. The made ground was further underlined by clay to a depth of 3m bgl. At the time of the survey there were no noted visual or olfactory observations of contamination. Three soil samples were obtained and submitted for analysis, the results confirmed there were no elevated levels of determinants present in any of the samples obtained.

#### Zone 5 – WS01

This area was chosen due to the high possibility of leaks and spills having occurred from the primary clarifier. The SPMP notes that area was surfaced with hardstanding comprising of concrete to a depth of 0.3 bgl. Made ground was present beneath the concrete hard standing comprising as sandy with occasional clayey gravel to a depth of 0.75m. The made ground was further underlined by clay to a depth of 3m bgl. Three soil samples were obtained and submitted for analysis, all of the results for the samples obtained were below the limit of detection.

The contamination encountered in each area was deemed to be at levels that would not require any further data to be collected, and further action would be taken.

#### **Measures taken to protect land and water**

The site maintained and operated an Environmental Management System (EMS) which was accredited to the ISO 14001 standard. Policies, systems and methods

of working including regular inspections and maintenance of pollution prevention infrastructure were in place to prevent pollution incidents throughout the lifetime of the permit.

### **Process effluent and surface water**

There were no emissions to ground or groundwater. All process effluent was treated on site prior to discharge to the discharged to a tributary of the River Witham. As noted above the effluent treatment plant remains a permitted activity and has recently been transferred to as a new permit. Uncontaminated surface water was discharged via a separate emission point to a tributary of the River Witham. The site drainage system included a number of grease traps and interceptors. All traps and interceptors are subject to monitoring and annual cleaning. Staff undertook regular training on spill procedures with spill kits located at strategic locations around the site.

### **Hardstanding and Bunds**

The site is surfaced with concrete hardstanding, that has been regularly maintained and inspected and repaired were required.

All tanks, containers and storage vessels containing materials with the potential to cause pollution were stored within concrete bunds. The tanks, containers and storage vessels used to store oils, chemicals, mineral oil, and reclaimed vegetable oil which are associated with the process were stored in tanks with appropriate bunding greater than 110% of the volume of the tank, container or storage vessel. Fuel oil for the onsite boilers and cooking oils were stored in bunded stainless steel tanks, the tanks were further protected from accidental collision through the use of barriers, in addition the location of filling points were located within the bund. Bunds were inspected on a six-monthly basis and were required remedial works were identified and carried as soon as practically possible.

### **Chemical Storage**

Chemicals used at the site were stored in containers, barrels or tanks such as IBCs (Intermediate Bulk Containers) were securely stored in dedicated storage areas primarily within the factory area, close to their point of use.

### **Raw material storage**

The raw material associated with the main activity was potatoes, additives (flavourings and coatings) vegetable oil and reclaimed vegetable oil. Potatoes were delivered to site on a regular basis with limited storage on site. Additives were stored in sacks and small containers within internal areas. Vegetable oil and reclaimed vegetable oil were stored in metal tanks within bunded areas situated on hard standing.

## **Waste**

Limited waste was produced at the site, the main by-product as part of the potato processing was peel and starch. Peel was transferred to sealed skips and removed from site for further processing, mainly into animal feed. Starch was separated from the wastewater stream, dried and stored in bulk bags before removal off site for use in the food manufacturing industry. Incidental soil from the washing of the potatoes was separated from the wastewater stream and collected for land spreading. Other incidental wastes such as packaging were collected and stored separately, baled prior to removal for off site recycling. Drums and plastic containers were rinsed and returned to the supplier. Other wastes are stored in appropriately labelled skips on concrete hardstanding.

## **Incidents**

There have been a number of exceedances with regard to the effluent discharge to the tributary of the River Witham via emission point W1 from the effluent treatment plant and to the storm drain W2, which also forms a tributary to the River Witham. These involve exceedance of either the emission limit for Suspended solids (TSS) or the emission limit for chloride at the final effluent discharge point (W1).

There have been no other recorded pollution incidents, during the life of the permit that required remediation.

## **Decommissioning**

The decommissioning plan ensured that the installation was decommissioned safely, in a manner that avoided the risk of pollution of the ground, any underlying groundwater and any watercourses and returned the site upon which the Installation stands to a satisfactory state:

- All tanks containing vegetable and other oils have been drained by an approved contractor and cleaned prior to removal.
- The oil separator and tank was drained by an approved contractor and cleaned prior to removal.
- All potentially polluting materials (raw materials/chemicals/wastes) were removed by licensed contractors, sold or moved to a sister site.
- The ammonia refrigeration system was decommissioned by an approved contractor, the system was purged and vac pump used to remove all residual ammonia from the system.

- Oil was drained from 148 gear boxes with spill mats in situ to capture any remaining oil deposits. Other equipment has been relocated to another site.
- The temporary boiler has been disconnected from the gas supply and drained down in preparation for off site removal.

## **Conclusion**

The permitted activities have ceased at the installation, and all dismantling and decommissioning works are complete, thus all pollution risk is considered to have been removed.

The Environment Agency agrees with the assessment that there has been no significant increase in levels of contaminants associated with the ground or groundwater underlying the site during the period of permitted activities.

From the evidence supplied in the Site Surrender Condition Report, the Environment Agency has concluded that the pollution risk has been removed and that the measures put in place by the operator during the life of the permit have protected the site from deterioration. The application to surrender the permit is accepted.

## **Decision considerations**

### **Confidential information**

A claim for commercial or industrial confidentiality has not been made.

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

### **Identifying confidential information**

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

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

### **Pollution risk**

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility.

### **Satisfactory state**

We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation.

### **Growth duty**

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