

# **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/SP3336UV  
The Operator is:                         Pork Farms Limited  
The Installation is:                     Queens Drive Baked Products  
This Variation Notice number is:   EPR/SP3336UV/V002

### **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 4<sup>th</sup> 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.

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 03/03/2023.

We considered it was in the correct form and contained sufficient information for us to begin our determination of the permit review but not that it necessarily contained all the information we would need to complete that determination.

The Operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 61 Notice response that appears to be confidential in relation to any party.

## 2.2 Review of our own information in respect to the capability of the Installation to meet revised standards included in the BAT Conclusions document

Based on our records and previous experience in the regulation of the installation we consider that the Operator will be able to comply with the techniques and standards described in the BAT Conclusions other than for those techniques and requirements described in BAT Conclusion 3, 6, 9, 11 and 12. In relation to this these BAT Conclusions, we do not fully agree with the Operator in respect of their current stated capability as recorded in their response to the Regulation 61 Notice. We have therefore included Improvement Conditions IC8, IC9 and IC10 in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusions are delivered within 3 months of the variation being issued.

## 2.3 Requests for further information during determination

Although we were able to consider the Regulation 61 Notice response generally satisfactory at receipt, we did in fact need more information in order to complete our permit review assessment, and issued further information requests on 28/10/2024 relating to narrative BATc 3, 6, 7, 9, 11, 12, 15, and non-narrative BAT in relation to production/capacity threshold, H1 assessment, soil & groundwater risk assessment (baseline report), relevant hazardous substances, climate change adaption plan, containment, regulated activity and site plan and on 13/11/2024 relating to BAT29 EPL's. A copy of each further information request was placed on our public register.

# **3 The legal framework**

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

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

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

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

## Annex 1: decision checklist regarding relevant BAT Conclusions

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

There are 37 BAT Conclusions.

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

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

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

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

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

**NA – Not Applicable**

**CC – Currently Compliant**

**FC – Compliant in the future (within 4 years of publication of BAT Conclusions)**

**NC – Not Compliant**

BATC No.	Summary of BAT Conclusion requirement for Food, Drink and Milk Industries	Status NA/ CC / FC / NC	Assessment of the installation capability and any alternative techniques proposed by the Operator to demonstrate compliance with the BAT Conclusion requirement
<b>GENERAL BAT CONCLUSIONS (BAT 1-15)</b>			
1	<p><b>Environmental Management System - Improve overall environmental performance.</b></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>The Operator has an EMS which covers all the topics set out in BATc 1. This EMS is not accredited to ISO14001 however, upon review we agree that the EMS is written to ISO14001 standards.</p>
2	<p><b>EMS Inventory of inputs &amp; outputs. Increase resource efficiency and reduce emissions.</b></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 declared:</p> <ul style="list-style-type: none"> <li>• Water, energy and raw material use are reviewed weekly to reduce consumption and waste and maximise efficiency.</li> <li>• Any changes of processes and products are reviewed against potential changes to consumption and possible affects.</li> <li>• Annual KPI's and targets are set to reduce energy and water consumption and minimising waste. Current targets are set to achieve 25% - 35% greater efficiency for all consumption and waste minimisation aspects on-site.</li> <li>• Process flow diagrams are produced to show the entire production process from sourcing raw materials to finished</li> </ul>

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>product as well as inputs and outputs of energy, water, steam, process effluent, waste and compressed air.</p> <ul style="list-style-type: none"> <li>• Organisational wide reporting dashboard in place to benchmark with other sites and Operators in the same food production sector.</li> <li>• Active monitoring in place for effluent and oven emission points.</li> </ul> <p>The Operator has an EMS which covers all the topics set out in BATc 2.</p>
3	<p><b>Monitoring key process parameters at key locations for emissions to water.</b> 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>	FC	<p>The Operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with BATc 3.</p> <p>The Operator monitors pH, total suspended solids, chemical oxygen demand (COD), flow and temperature through their sewer authority, Severn Trent Water on a monthly basis, with limits set by the sewer authority. Emission source points are monitored regularly by the sewer authority with compliance reports provided to the EA. The Operator provided a Severn Trent Water monitoring report at the time of submission dated 02/02/2023 to confirm sampling is taking place and in compliance with their sewer authority permit.</p> <p>However no continuous monitoring takes place on-site and the daily effluent discharge at both emission source points to foul sewer are unknown. One emission source point has no flow meter and while the other emission</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>source point does have a flow meter, it is not calibrated, and the data is not accurate.</p> <p>We have included improvement condition IC8 to ensure compliance.</p>
4	<p><b>Monitoring emissions to water to the required frequencies and standards.</b>            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 is applicable only to installations discharging process effluent to surface water and this site discharges only to foul sewer under consent therefore, BATc 4 is not applicable.</p>
5	<p><b>Monitoring channelled emissions to air to the required frequencies and standards.</b>            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>This BATc is applicable to installations where dust emissions from processes such as drying, cooling, grinding, or milling are used.</p> <p>No smokers or related drying techniques are used on-site and no other activity techniques are applicable to this site, therefore BATc 5 is not applicable.</p>
6	<p><b>Energy Efficiency</b>            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>The Operator uses a third-party assessor every four years to examine potential energy saving practices. The Operator also employs a KPI target sheet for potential improvements. However no formal energy efficiency plan is in</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>place that complies with BAT 6a. Improvement condition IC9 has been included in the permit to ensure compliance.</p> <p>The Operator is using the following techniques:</p> <ul style="list-style-type: none"> <li>• 95% of the site's lighting has been installed with energy efficient alternatives.</li> <li>• New modern compressors have been installed to reduce compressed air leaks.</li> <li>• Variable speed drives used on-site.</li> <li>• Temperature control installed for burner ovens.</li> </ul>
7	<p><b>Water and wastewater minimisation</b></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> <p>(b) Optimisation of water flow</p> <p>(c) Optimisation of water nozzles and hoses</p> <p>(d) Segregation of water streams</p> <p>Techniques related to cleaning operations:</p> <p>(e) Dry cleaning</p> <p>(f) Pigging system for pipes</p> <p>(g) High-pressure cleaning</p> <p>(h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP)</p> <p>(i) Low-pressure foam and/or gel cleaning</p> <p>(j) Optimised design and construction of equipment and process areas</p> <p>(k) Cleaning of equipment as soon as possible</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> <p>The Operator is using the following techniques:</p> <p>(a) Water reuse - Cleaning chemicals are reused in the CIP system on site, which with every cleaning cycle reuses some of the cleaning chemicals and water .</p> <p>(b) Optimisation of water flow.</p> <p>(c) Optimisation of water nozzles and hoses - Water flow controlled by the optimisation of nozzles and hoses, preventing increased water use and providing water at a more appropriate pressure for cleaning.</p> <p>(e) Dry cleaning - Used in areas where flour is used, reduces water consumption and reduces</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>sticky residues that require increased cleaning.</p> <p>(g) High pressure cleaning - Medium pressure cleaning used throughout the site.</p> <p>(h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP) (automatic dosing systems). The spiral chillers contain a CIP system.</p> <p>(k) Cleaning of equipment as soon as possible within the cleaning bays on site, factory equipment that does not benefit from CIP is dismantled and parts moved for cleaning.</p>
8	<p><b>Prevent or reduce the use of harmful substances</b></p> <p>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.</p> <p>(a) Proper selection of cleaning chemicals and/or disinfectants</p> <p>(b) Reuse of cleaning chemicals in cleaning-in-place (CIP)</p> <p>(c) Dry cleaning</p> <p>(d) Optimised design and construction of equipment and process areas</p>	CC	<p>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.</p> <p>The Operator is using the following techniques:</p> <p>(a) Proper selection of cleaning chemicals and/or disinfectants – The site has a contract with a third-party organisation, who provide the Operator with guidance on solutions for cleaning chemicals, and providing industry standard solutions for the cleaning needs of the food processing sector.</p> <p>(b) Reuse of cleaning chemicals in cleaning-in-place (CIP) – Cleaning chemicals are reused in the CIP system on site, which with every cleaning cycle reuses some of the cleaning chemicals and water.</p> <p>(c) Dry cleaning – Used in pastry manufacturing room on a daily basis (along with extraction for flour), this reduces the</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>amount of chemicals used in cleaning to once a week during the deep clean.</p> <p>(d) Optimised design and construction of equipment and process areas - Equipment is designed so that it may easily be cleaned and taken apart for cleaning, there are also dedicated areas where cleaning takes place.</p>
9	<p><b>Refrigerants</b></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>	FC	<p>The Operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with BATc 9.</p> <p>The Operator uses the below F-gases in their production process which are above 1400 global warming potential (GWP) which we consider to be high.</p> <p>The follow F-gases are in use on-site:</p> <ul style="list-style-type: none"> <li>• R422D - &gt;2500 GWP</li> <li>• R134A – 1430 GWP</li> <li>• R407C – 1774 GWP</li> <li>• R438A – 2252 GWP</li> </ul> <p>There is no F-gas replacement plan currently in place. IC10 has been included to ensure compliance.</p>
10	<p><b>Resource efficiency</b></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> <p>(c) Separation of residues</p> <p>(d) Recovery and reuse of residues from the pasteuriser</p> <p>(e) Phosphorus recovery as struvite</p> <p>(f) Use of waste water for land spreading</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> <p>The Operator is using the following techniques:</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
			(a) Anaerobic digestion (AD) – All food waste from on-site is sent for disposal to an off-site anaerobic digester.
11	<p><b>Waste water buffer storage</b> In order to prevent uncontrolled emissions to water, BAT is to provide an appropriate buffer storage capacity for waste water.</p>	FC	<p>The Operator has provided information to support compliance with BATc 11. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with BATc 11.</p> <p>The Operator should have sufficient buffer storage capacity to minimize any uncontrolled emissions to water and/or sewer. The Operator is required to complete a feasibility study on installing appropriate buffer storage.</p> <p>The Operator has no effluent buffer storage on-site available to hold back effluent in the event that effluent could/should not be discharged to sewer, or to prevent contaminated effluent from entering sewer in an emergency.</p> <p>Improvement condition IC8 has been included in the permit to confirm compliance with BATc 11. Improvement condition IC11 has been included for the Operator to undertake a feasibility study on installing appropriate buffer capacity. (see Annex 3).</p>
12	<p><b>Emissions to water – treatment</b> 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)</p>	FC	<p>The Operator has provided information to support compliance with BATc 12. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with BATc 12.</p> <p>The Operator declared:</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										
	Aerobic and/or anaerobic treatment (secondary treatment) (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		<ul style="list-style-type: none"> <li>Process effluent undergoes no treatment prior to discharge.</li> <li>Surface water from the site is discharged via oil interceptor (to physically separate oil from water). The interceptor is a precautionary measure in the event of a spill. The Operator expects that the surface water will not contain oil.</li> </ul> <p>The operator is required to complete a feasibility study on installing effluent treatment including a review of treatment options available along with their associated benefits.</p> <p>We consider that the Operator will be future compliant with BATc 12. Improvement conditions IC8 has been included in the permit to achieve compliance. Additionally, IC12 has been included for the Operator to undertake a feasibility study on installing effluent treatment. (see Annex 3).</p>										
12	<b>Emissions to water – treatment</b> <b>BAT-associated emission levels (BAT-AELs) for direct emissions to a receiving water body</b> <table border="1" data-bbox="282 1137 1211 1337"> <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	<p>We are satisfied that BATc 12 AEL is not applicable to this installation.</p> <p>BATc 12 AEL is applicable only to installations discharging process effluent to surface water and this site discharges only to foul sewer under consent therefore, BATc 12 AEL is not applicable.</p>
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	<b>Noise management plan</b> 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	NA	<p>We are satisfied that BATc 13 is not applicable to this installation.</p>										

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	<p>part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> <li>- a protocol containing actions and timelines;</li> <li>- a protocol for conducting noise emissions monitoring;</li> <li>- a protocol for response to identified noise events, eg complaints;</li> <li>- 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.</li> </ul>		<p>BATc 13 is only applicable to cases where noise nuisance at sensitive receptors is expected and/or has been substantiated.</p>
14	<p><b>Noise management</b></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> <ul style="list-style-type: none"> <li>(a) Appropriate location of equipment and buildings</li> <li>(b) Operational measures</li> <li>(c) Low-noise equipment</li> <li>(d) Noise control equipment</li> <li>(e) Noise abatement</li> </ul>	<b>CC</b>	<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 is using the following techniques:</p> <ul style="list-style-type: none"> <li>(a) Appropriate location of equipment and buildings - Noise generating equipment at the site is largely situated on the opposite side of the site to the nearest residential properties on the Meadows estate (approximately 800 m).</li> <li>(e) Noise abatement - commissioned for the refurbishment of the compressor houses.</li> </ul>
15	<p><b>Odour Management</b></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"> <li>- a protocol containing actions and timelines;</li> <li>- a protocol for conducting odour monitoring.</li> <li>- a protocol for response to identified odour incidents eg complaints;</li> <li>- 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.</li> </ul>	<b>NA</b>	<p>We are satisfied that BATc 15 is not applicable to this Installation.</p> <p>BATc 15 is only applicable to cases where an odour nuisance at sensitive receptors is expected and/or has been substantiated. The site has not had any historic issues associated with odour.</p>

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<b>Meat Processing sector BAT conclusions</b>									
29	<b>Emissions to air – Meat Processing sector</b> In order to reduce channelled emissions of organic compounds to air from meat smoking, BAT is to use one or a combination of the techniques given below.  a) Adsorption b) Thermal oxidation c) Wet scrubber d) Use of purified smoke	<b>NA</b>	We are satisfied that BATc 29 is not applicable to this Installation.  This BATc is concerned with sites that smoke meats during their process. This installation does not undertake any smoking of meats, and as such BATc 29 is not applicable.						
29	<b>Emission to air – AEL</b>  <p style="text-align: center;"><i>Table 18</i></p> <p style="text-align: center;">BAT-associated emission level (BAT-AEL) for channelled TVOC emissions to air from a smoke chamber</p> <table border="1" data-bbox="280 879 1205 986"> <thead> <tr> <th>Parameter</th> <th>Unit</th> <th>BAT-AEL (average over the sampling period)</th> </tr> </thead> <tbody> <tr> <td>TVOC</td> <td>mg/Nm<sup>3</sup></td> <td>3-50 <sup>(1)</sup> <sup>(2)</sup></td> </tr> </tbody> </table> <p><sup>(1)</sup> The lower end of the range is typically achieved when using adsorption or thermal oxidation.  <sup>(2)</sup> The BAT-AEL does not apply when the TVOC emission load is below 500 g/h.</p>	Parameter	Unit	BAT-AEL (average over the sampling period)	TVOC	mg/Nm <sup>3</sup>	3-50 <sup>(1)</sup> <sup>(2)</sup>	<b>NA</b>	We are satisfied that BATc 29-AELs are not applicable to this Installation.  These BAT-AELs are concerned with sites that smoke meats during their process. This installation does not undertake any smoking of meats, and as such BATc 29-AELs are not applicable.
Parameter	Unit	BAT-AEL (average over the sampling period)							
TVOC	mg/Nm <sup>3</sup>	3-50 <sup>(1)</sup> <sup>(2)</sup>							
<b>Meat Processing Sector Environmental Performance Levels</b>									
EPL	<b>Environmental Performance Level – Specific energy consumption for the Meat Processing sub-sector</b>  <p style="text-align: center;"><i>Table 16</i></p> <p style="text-align: center;">Indicative environmental performance level for specific energy consumption</p> <table border="1" data-bbox="280 1294 1205 1401"> <thead> <tr> <th>Unit</th> <th>Specific energy consumption (yearly average)</th> </tr> </thead> <tbody> <tr> <td>MWh/tonne of raw materials</td> <td>0,25-2,6 <sup>(1)</sup> <sup>(2)</sup></td> </tr> </tbody> </table> <p><sup>(1)</sup> The specific energy consumption level does not apply to the production of ready meals and soups.  <sup>(2)</sup> The upper end of the range may not apply in the case of a high percentage of cooked products.</p>	Unit	Specific energy consumption (yearly average)	MWh/tonne of raw materials	0,25-2,6 <sup>(1)</sup> <sup>(2)</sup>	<b>CC</b>	The operator has provided information to support compliance with the EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with the EPL for energy consumption.  The operator has stated an energy consumption of 0.877 MWh/tonne of raw material and as such fall within the guidelines set out in the BAT conclusions.		
Unit	Specific energy consumption (yearly average)								
MWh/tonne of raw materials	0,25-2,6 <sup>(1)</sup> <sup>(2)</sup>								

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				
EPL	<p><b>Environmental Performance Level – Specific waste water discharge for the Meat Processing sub-sector</b></p> <p style="text-align: center;"><i>Table 17</i></p> <p style="text-align: center;">Indicative environmental performance level for specific waste water discharge</p> <table border="1" data-bbox="280 466 1198 550"> <thead> <tr> <th data-bbox="280 466 739 502">Unit</th> <th data-bbox="739 466 1198 502">Specific waste water discharge(yearly average)</th> </tr> </thead> <tbody> <tr> <td data-bbox="280 502 739 550">m<sup>3</sup>/tonne of raw materials</td> <td data-bbox="739 502 1198 550">1,5-8,0 <sup>(1)</sup></td> </tr> </tbody> </table> <p><sup>(1)</sup> The specific waste water discharge level does not apply to processes using direct water cooling and to the production of ready meals and soups.</p>	Unit	Specific waste water discharge(yearly average)	m <sup>3</sup> /tonne of raw materials	1,5-8,0 <sup>(1)</sup>	CC	<p>The operator has provided information to support compliance with the EPL. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with the EPL for specific waste water discharge.</p> <p>The operator has stated a specific waste water discharge of 5.370 m<sup>3</sup>/tonne of raw product and as such fall within the guidelines set out in the BAT conclusions.</p>
Unit	Specific waste water discharge(yearly average)						
m <sup>3</sup> /tonne of raw materials	1,5-8,0 <sup>(1)</sup>						

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

### **Updating permit during permit review consolidation**

- Introductory note updated
- Table S1.1 overhaul
  - Activity Reference (AR) renumbering
  - 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 H1 assessment is not valid for the maximum capacity stated within the permit or if production is now higher. We have included an improvement condition within the permit (IC13) which requires the Operator to revisit their H1 risk assessment for particulate emissions to air at the capacity limit figure that is now stated 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**

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 below:

**Boilers**

1. Rated thermal input (MW) of the medium combustion plant.	1.8 MWth	1.8 MWth
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Gas fired engine	Gas fired engine
3. Type and share of fuels used according to the fuel categories laid down in Annex II.	Natural gas	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.	June 2005	June 2005

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.

### **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.

We have included an Improvement condition in the permit (IC14) which requires the Operator to submit an updated site condition report which includes baseline soil and groundwater data. See Improvement conditions in Annex 3 of this decision document.

### **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 is required to undertake an assessment to ascertain if any hazardous substances are used and stored on site. If hazardous substances are found to be used or stored at the site the Operator is to undertake a short risk assessment on the hazardous substance stored at the installation. The risk assessment is a stage 1-3 assessment as detailed within EC Commission Guidance 2014/C 136/03.

- The stage 1 assessment identified the hazardous substances used / stored on site.
- The stage 2 assessment identified if hazardous substances are capable of causing pollution. If they are capable of causing pollution they are then termed Relevant Hazardous Substances (RHS).
- The Stage 3 assessment identified if pollution prevention measures are fit for purpose in areas where hazardous substances are used / stored. This includes drains as well.

We have included an improvement condition into the permit (IC15) to request that the assessment is undertaken and is submitted by the Operator for approval from the Environment Agency.

If the outcome of the three stage assessment identified that pollution of soil / groundwater to be possible, and monitoring is required for these hazardous substances. The Operator is required to submit a relevant hazardous substances monitoring plan for review to the Environment Agency via improvement condition (IC15).

## **Climate Change Adaptation**

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

The Operator has identified the installation as likely to be or has been affected by flooding and drought, which we consider to be a severe weather event.

We do not consider the Operator to have submitted a suitable climate change adaptation plan for the installation. We have included an improvement condition into the permit (IC16) to request a climate change adaptation plan is submitted by the Operator for approval from the Environment Agency.

## **Containment**

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

We have set an improvement condition in the permit to address the deficiencies in the existing tanks and containment measures on-site (IC17). See Improvement condition(s) in Annex 3 of this decision document.

### Annex 3: Improvement Conditions

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

Expired improvement conditions in the previous permit.

<b>Superseded Improvement Conditions – Removed from permit</b>	
<b>Reference</b>	<b>Improvement Condition</b>
IP1	The Operator shall develop a written Site Closure Plan having regard for the Agency Sector Guidance Note IPPC S6.10, Issue 1, August 2003, and shall submit a copy to the Agency for approval.
IP2	The Operator shall undertake a review of options for effluent treatment following the Agency's Sector Guidance Note IPPC S6.10, Issue 1, August 2003, section 2.2.2. A written report summarising the techniques and demonstrating BAT shall be submitted to the Agency and include time scales for the implementation of preferred options. The report provided shall be agreed in writing with the Agency.
IP3	The Operator shall develop and implement an Emissions Monitoring Programme for emissions to sewer, having regard for the Agency's Sector Guidance Note IPPC S6.10, Issue 1, August 2003 and Agency Technical Guidance on Monitoring referenced in the above Guidance Note. The Programme shall have due regard for the Agency's requirement for MCERTS accreditation for the monitoring equipment, personnel and organisations employed and for the conformance of all monitoring methods and procedures with appropriate monitoring Standards such as CEN, BSI, ISO, etc. The Emissions Monitoring Programme shall be agreed with the Agency prior to implementation.
IP4	The Operator shall carry out a review of all available monitoring data for the release to sewer, including those generated by the Emissions Monitoring Programme implemented under Improvement Condition IP3. The review shall be submitted to the Agency and shall propose ELV's for the release to sewer. Where the proposed ELV's deviate from those consistent with the application of BAT, the Operator shall justify any such deviation in conjunction with the requirements of Improvement Condition IP2. The Agency shall consider the proposals submitted and may set such ELV's as it considers appropriate for the control of the release to sewer.
IP5	The Operator shall conduct a survey of the site drainage system and shall develop and implement effective monitoring systems, following the Sector Guidance Note IPPC S6.10, Issue 1, August 2003 with the purpose of preventing or minimising fugitive or accidental releases to the environment. A copy of the site drainage plans arising from the survey shall be submitted to the Agency, together with a description of the monitoring systems developed with a timetable for their implementation.
IP6	The Operator shall review the Environmental Management System, having regard for the Agency Sector Guidance Note IPPC S6.10,

	Issue 1, August 2003. The recommendations of the review and a timetable to implement the improvements shall be submitted to the Agency in writing.
IP7	The Operator shall develop and implement an Odour Management Plan for the Installation, having regard for techniques described in the Agency Sector Guidance Note IPPC S6.10, Issue 1, August 2003 and Technical Guidance Note IPPC H4, Horizontal Guidance for Odour Part 1 (Regulation and Permitting) and Part 2 (Assessment and Control). A copy of the Odour Management Plan shall be submitted to the Agency.

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

<b>Improvement programme requirements</b>		
<b>Reference</b>	<b>Reason for inclusion</b>	<b>Justification of deadline</b>
IC8	<p>The operator shall confirm, 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 with respect to BATc 3, 11 and 12.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	<p>3 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/03/2025</p>
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"> <li>• Methodology applied for achieving BAT</li> <li>• Demonstrating that BAT has been achieved.</li> </ul> <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 6a energy efficiency plan.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	<p>3 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/03/2025</p>
IC10	<p>The operator shall use refrigerants without ozone depletion potential and with a low global warming potential (GWP) in accordance with BAT 9 from the Food, Drink and Milk Industries BATCs.</p> <p>To demonstrate compliance against BAT 9, the operator shall produce a plan for the onsite refrigerant system(s) at the installation. The plan is to be assessed by the Environment Agency and shall be incorporated within the existing environmental management system.</p> <p>The plan should include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>• Where practicable, retro filling systems containing high GWP refrigerants e.g. R-404A with lower GWP alternatives as soon as possible.</li> <li>• An action log with timescales, for replacement of end-of-life equipment using refrigerants with the lowest practicable GWP.</li> </ul>	<p>3 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/03/2025</p>

IC11	<p>The Operator shall submit a written report to the Environment Agency for technical assessment and approval on the feasibility of installing effluent treatment and include a review of treatment options available along with their associated benefits. Justification is required where no on-site treatment is provided, taking into account the nature of the wastewater and any subsequent off-site treatment. In addition the report needs to consider the appropriate on-site monitoring of the effluent stream prior to disposal. (BAT 3, 4 and 12 Best Available Techniques Reference Document and BAT Conclusions document for the food, drink and milk industry dated December 2019).</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>
IC12	<p>The Operator shall undertake a survey of the waste water buffer storage at the site and review measures against relevant standard including:</p> <p>The operator shall submit a written report that meets the Narrative BAT requirements for the BAT Conclusions for Food, Drink and Milk Industries with respect to BAT 11, to the Environment Agency for approval, outlining the results of the survey and the review of feasibility of options and provide details of:</p> <ul style="list-style-type: none"> <li>• current containment measures</li> <li>• improvements proposed</li> <li>• time scale for implementation of improvements.</li> </ul> <p>The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>
IC13	<p>The operator shall review and update the H1 risk assessment at the capacity levels stated within table S1.1 of this permit. The H1 shall be submitted to the Environment Agency for review.</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>

IC14	<p>The Operator shall produce a Site Condition Report (SCR) in line with our H5 Guidance. The report shall contain the information necessary to determine the state of soil and groundwater, and ensure this is maintained throughout the life of the permit by using the results to better inform the SPMP. The report shall be submitted to the Environment Agency for review.</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>
IC15	<p>The operator shall submit to the Environment Agency for approval a risk assessment considering the possibility of soil and groundwater contamination at the installation where the activity involves the use, production or release of a hazardous substances (as defined in Article 3 of Regulation (EC) No. 1272/2008 on classification, labelling and packaging of substances and mixtures).</p> <p>A stage 1-3 assessment should be completed (as detailed within the EC Commission Guidance 2014/C 136/-3) as follows;</p> <p>Stage 1 – Identify hazardous substance(s) used / stored on site.</p> <p>Stage 2 – Identify if the hazardous substance(s) are capable of causing pollution. If they are capable of causing pollution, they are then termed Relevant Hazardous Substances (RHS).</p> <p>Stage 3 – Identify if pollution prevention measures &amp; drains are fit for purpose in areas where hazardous substances are used / stored.</p> <p>If the outcomes of Stage 3 identifies that pollution of soil / ground water to be possible. The operator shall produce and submit a monitoring plan to the Environment Agency for approval detailing how the substance(s) will be monitored to demonstrate no pollution. The operator shall commence monitoring of the RHS within a timescale as agreed by the Environment Agency.</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>

IC16	<p>The operator shall produce a climate change adaptation plan, which will form part of the EMS.</p> <p>The plan shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• Details of how the installation has or could be affected by severe weather;</li> <li>• The scale of the impact of severe weather on the operations within the installation;</li> <li>• An action plan and timetable for any improvements to be made to minimise the impact of severe weather at the installation.</li> </ul> <p>The Operator shall implement any necessary improvements to a timetable agreed in writing with the Environment Agency.</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>
IC17	<p>The Operator shall undertake a survey of the primary, secondary and tertiary containment at the site and review measures against relevant standard including:</p> <ul style="list-style-type: none"> <li>• CIRIA Containment systems for the prevention of pollution (C736) – Secondary, tertiary and other measures for industrial and commercial premises,</li> <li>• EEMUA 159 - Above ground flat bottomed storage tanks</li> </ul> <p>The operator shall submit a written report to the Environment Agency approval which outlines the results of the survey and the review of standard and provide details of</p> <ul style="list-style-type: none"> <li>• current containment measures</li> <li>• any deficiencies identified in comparison to relevant standards,</li> <li>• improvements proposed</li> <li>• time scale for implementation of improvements.</li> </ul> <p>The operator shall implement the proposed improvements in line with the timescales agreed by the Environment Agency.</p>	<p>12 months from date of permit issue or as agreed in writing by the Environment Agency</p> <p>06/12/2025</p>