

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/RP3106PL
The Operator is: United Petfood UK Limited
The Installation is: Skretting
This Variation Notice number is: EPR/RP3106PL/V005

What this document is about

Article 21(3) of the Industrial Emissions Directive (IED) requires the Environment Agency to review conditions in permits that it has issued and to ensure that the permit delivers compliance with relevant standards, within four years of the publication by the European Commission of updated decisions on best available techniques (BAT) Conclusions.

We have reviewed the permit for this installation against the BAT Conclusions for the Food, Drink and Milk Industries published on 4th December 2019 in the Official Journal of the European Union. In this decision document, we set out the reasoning for the consolidated variation notice that we have issued.

It explains how we have reviewed and considered the techniques used by the Operator in the operation and control of the plant and activities of the installation. It is our record of our decision-making process and shows how we have taken into account all relevant factors in reaching our position.

As well as considering the review of the operating techniques used by the Operator for the operation of the plant and activities of the installation, the consolidated variation notice takes into account and brings together in a single document all previous variations that relate to the original permit issue. Where this has not already been done, it also modernises the entire permit to reflect the conditions contained in our current generic permit template.

The introduction of new template conditions makes the Permit consistent with our current general approach and with other permits issued to Installations in this sector. Although the wording of some conditions has changed, while others have been deleted because of the new regulatory approach, it does not reduce the level of environmental protection achieved by the Permit in any way. In this document, we therefore address only our determination of substantive issues relating to the new BAT Conclusions.

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 04/05/2021 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 31/05/2022.

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 Conclusions 1, 2, 5, 6, 15, 17 and in relation to EPL for energy consumption, capacity threshold, boiler blowdown and site condition report. In relation to 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 IP7, IP8, IP9, IP10, IP11, IP12, IP13 and IP14 in the Consolidated Variation Notice to ensure that the requirements of the BAT Conclusions are delivered.

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 27/11/2024 in relation to BATcs 1, 2, 5, 6, 7, 8, 9, 14, 15, 17 and EPL for specific energy consumption, site plan, capacity threshold and soil and groundwater risk assessment (baseline report). Likewise the operator was asked to specify their current permitted activity, their gross finished product production capacity and confirm the figure for animal raw material within finished products. A further clarification was sent on 06/01/2025 asking the Operator to: confirm normal operating days and hours, provide a more detailed site plan and specify animal raw material (as a %) in each recipe. 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
GENERAL BAT CONCLUSIONS (BAT 1-15)			
1	<p>Environmental Management System - Improve overall environmental performance.</p> <p>Implement an EMS that incorporates all the features as described within BATc 1.</p>	FC	<p>The Operator has provided information to support compliance with BATc 1. We have assessed the information provided and we not are satisfied that the Operator has demonstrated compliance with BATc 1.</p> <p>The Operator has an: Environmental & Sustainability Policy, a new management organogram, H&S Policy, Spill & Clean procedures and Environmental Risk Assessment form. However, a consolidated EMS summary has not been provided following the implementation of a new management structure on site. We have included an Improvement Condition (IP7) to provide an up to date EMS for the site.</p>
2	<p>EMS Inventory of inputs & outputs. Increase resource efficiency and reduce emissions.</p> <p>Establish, maintain and regularly review (including when a significant change occurs) an inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams, as part of the environmental management system (see BAT 1), that incorporates all of the features as detailed within the BATCs.</p>	FC	<p>The Operator has provided information to support compliance with BATc 2. We have assessed the information provided and we not are satisfied that the Operator has demonstrated compliance with BATc 2.</p> <p>The Operator has provided:</p> <ul style="list-style-type: none"> -Site Plan with Flows - Information in support of water mass balance - Information on energy consumption and raw materials usage - Information regarding management of air distribution system. <p>We have included an Improvement Condition (IP8) to provide an integrated EMS Inventory for</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
			inputs and outputs to meet the requirements for BATc 2 for the site.
3	<p>Monitoring key process parameters at key locations for emissions to water.</p> <p>For relevant emissions to water as identified by the inventory of waste water streams (see BAT 2), BAT is to monitor key process parameters (e.g. continuous monitoring of waste water flow, pH and temperature) at key locations (e.g. at the inlet and/or outlet of the pre-treatment, at the inlet to the final treatment, at the point where the emission leaves the installation).</p>	NA	<p>We are satisfied that BATc 3 is not applicable in this situation as all wastewater is discharged to sewer for treatment by United Utilities treatment works. This BATc applies to direct discharges of process effluent only.</p> <p>This site produces dry pet food, thus resulting in little wastewater being generated.</p> <p>The Operator states (in RFI response 19/12/2024) that there is no copy of the site's Discharge Consent with the sewerage undertaker available. Furthermore, the Operator confirmed that no effluent or discharge from the process takes place, with only domestic sewerage being discharged to the foul system.</p> <p>Monitoring of pH and temperature from the biofilter takes place, as this is the only waste water produced from the process.</p>
4	<p>Monitoring emissions to water to the required frequencies and standards.</p> <p>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 BATc4 is not applicable to this installation.</p> <p>The operator discharges waste water to United Utilities sewage treatment works and does not have any process water discharges to controlled waters. No proactive monitoring takes place on site by the Operator.</p>
5	<p>Monitoring channelled emissions to air to the required frequencies and standards.</p> <p>BAT is to monitor channelled emissions to air with at least the frequency given and in accordance with EN standards.</p>	FC	<p>The Operator has provided information to support compliance with BATc 5. We have assessed the information provided and we not are satisfied that the Operator has demonstrated compliance with BATc5.</p> <p>Although the Operator has provided a single Odour Lab Report (07/04/2023), this was</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>completed as a standalone report and does not analyse the particulate parameters required within the current permit. BAT is to monitor channelled emissions to air annually and in accordance with EN standards. The production of dry petfood at the site has two specific processes:</p> <ul style="list-style-type: none"> -grinding and pellet cooling in compound feed manufacture and - extrusion of dry pet food <p>Monitoring is associated with BATc 17.</p> <p>We have included an Improvement Condition (IP9) to provide a monitoring programme for channelled emissions to air, to meet the requirements for BATc 5.</p>
6	<p>Energy Efficiency</p> <p>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 not are satisfied that the Operator has demonstrated compliance with BATc 6.</p> <p>A list of actions that have been or are to be completed related to energy efficiency has been submitted, along with energy usage onsite. There is however, no integrated energy efficiency plan or management oversight.</p> <p>The Operator has confirmed use of the following techniques:</p> <ul style="list-style-type: none"> • Burner regulation and control • Recovery with heat exchangers and/or heat pumps • Lighting • Minimising boiler blowdown • Process control systems • Reducing compressed air system leaks

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
			<ul style="list-style-type: none"> • Variable speed drives <p>We have included an Improvement Condition (IP9) to provide an Energy Efficiency Plan to support meeting the requirements for BATc 6.</p>
7	<p>Water and wastewater minimisation</p> <p>In order to reduce water consumption and the volume of waste water discharged, BAT is to use BAT 7a and one or a combination of the techniques b to k given below.</p> <p>(a) water recycling and/or reuse (b) Optimisation of water flow (c) Optimisation of water nozzles and hoses (d) Segregation of water streams</p> <p>Techniques related to cleaning operations:</p> <p>(e) Dry cleaning (f) Pigging system for pipes (g) High-pressure cleaning (h) Optimisation of chemical dosing and water use in cleaning-in-place (CIP) (i) Low-pressure foam and/or gel cleaning (j) Optimised design and construction of equipment and process areas (k) Cleaning of equipment as soon as possible</p>	NA	<p>We are satisfied that BATc7 is not applicable to this installation. This installation only makes dry petfood and the process requires the ingredients and product remain dry throughout for efficient production.</p> <p>The Operator states only dry cleaning (e) possible as no internal factory drains. An Atex vacuum system and brushes and shovels are utilised.</p> <p>Water is not used in the process and surface water is discharged from site, with foul discharge, consisting of amenities and plant onsite. There is limited opportunity for water efficiencies.</p>
8	<p>Prevent or reduce the use of harmful substances</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 (b) Reuse of cleaning chemicals in cleaning-in-place (CIP) (c) Dry cleaning (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 declared:</p> <ul style="list-style-type: none"> - Proper selection of cleaning chemicals and disinfectants - Dry cleaning is used on the production line, by use of an Atex vacuum system

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
			with brushes and shovels where appropriate.
9	Refrigerants 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.	NA	We are satisfied that BATc 9 is not applicable to this installation. As part of the RFI response (19/12/2024) the Operator declared that there are no refrigerants used on site.
10	Resource efficiency In order to increase resource efficiency, BAT is to use one or a combination of the techniques given below: (a) Anaerobic digestion (b) Use of residues (c) Separation of residues (d) Recovery and reuse of residues from the pasteuriser (e) Phosphorus recovery as struvite (f) Use of waste water for land spreading	CC	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. The Operator declared: <ul style="list-style-type: none"> - Separation of residues for further processing from the dust emissions from pellet cooling and the grinding process - Reuse of residues within the formulations
11	Waste water buffer storage In order to prevent uncontrolled emissions to water, BAT is to provide an appropriate buffer storage capacity for waste water.	NA	We are satisfied that BATc 11 is not applicable to this installation. There is no process waste water originating from site. In order to prevent uncontrolled emissions to water, BAT is to provide an appropriate buffer storage capacity for waste water. However, no significant volumes of waste water are produced by the process therefore BATc 11 is not applicable.
12	Emissions to water – treatment In order to reduce emissions to water, BAT is to use an appropriate combination of the techniques given below. Preliminary, primary and general treatment (a) Equalisation (b) Neutralisation	NA	We are satisfied that BATc 12 is not applicable to this installation. The BAT-AELs do not apply to the production of dry pet food and compound feed.

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	(c) Physical separate (eg screens, sieves, primary settlement tanks etc) 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		Because BATc 12 is asking the Operator to use an appropriate combination of effluent treatment techniques for their wastewater discharge, direct or indirect, and because there are no discharges from this installation, we consider that BATc 12 is not applicable.										
12	<p>Emissions to water – treatment BAT-associated emission levels (BAT-AELs) for direct emissions to a receiving water body</p> <table border="1" data-bbox="282 991 1211 1190"> <thead> <tr> <th>Parameter</th> <th>BAT-AEL (t) (t) (daily average)</th> </tr> </thead> <tbody> <tr> <td>Chemical oxygen demand (COD) (t) (t)</td> <td>25-100 mg/l (t)</td> </tr> <tr> <td>Total suspended solids (TSS)</td> <td>4-50 mg/l (t)</td> </tr> <tr> <td>Total nitrogen (TN)</td> <td>2-20 mg/l (t) (t)</td> </tr> <tr> <td>Total phosphorus (TP)</td> <td>0,2-2 mg/l (t)</td> </tr> </tbody> </table>	Parameter	BAT-AEL (t) (t) (daily average)	Chemical oxygen demand (COD) (t) (t)	25-100 mg/l (t)	Total suspended solids (TSS)	4-50 mg/l (t)	Total nitrogen (TN)	2-20 mg/l (t) (t)	Total phosphorus (TP)	0,2-2 mg/l (t)	<p>NA</p>	<p>We are satisfied that BATc 12 is not applicable to this installation.</p> <p>The BAT-AELs do not apply to the production of dry pet food and compound feed.</p> <p>Because BATc 12 is asking the Operator to use an appropriate combination of effluent treatment techniques for their wastewater discharge, direct or indirect, and because there are no discharges from this installation, we consider that BATc 12 is not applicable.</p>
Parameter	BAT-AEL (t) (t) (daily average)												
Chemical oxygen demand (COD) (t) (t)	25-100 mg/l (t)												
Total suspended solids (TSS)	4-50 mg/l (t)												
Total nitrogen (TN)	2-20 mg/l (t) (t)												
Total phosphorus (TP)	0,2-2 mg/l (t)												
13	<p>Noise management plan</p> <p>In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to set up, implement and regularly review a noise management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> - a protocol containing actions and timelines; 	<p>NA</p>	<p>We are satisfied that BATc 13 is not applicable to this Installation.</p> <p>A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There have been no</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
	<ul style="list-style-type: none"> - a protocol for conducting noise emissions monitoring; - a protocol for response to identified noise events, eg complaints; - 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. 		substantiated noise nuisances from the site therefore an NMP is not a requirement for this site.
14	<p>Noise management</p> <p>In order to prevent or, where that is not practicable, to reduce noise emissions, BAT is to use one or a combination of the techniques given below.</p> <ul style="list-style-type: none"> (a) Appropriate location of equipment and buildings (b) Operational measures (c) Low-noise equipment (d) Noise control equipment (e) Noise abatement 	CC	<p>The Operator has provided information to support compliance with BATc 14. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 14.</p> <p>The Operator declared the noise management technique used at this site is the appropriate location of equipment and buildings and noise control equipment (grinder is in a sound booth). As the Improvement Condition (IP7) to implement an Environment Management System is completed, information about whether further control of noise emissions are necessary onsite will become clear.</p>
15	<p>Odour Management</p> <p>In order to prevent or, where that is not practicable, to reduce odour emissions, BAT is to set up, implement and regularly review an odour management plan, as part of the environmental management system (see BAT 1), that includes all of the following elements:</p> <ul style="list-style-type: none"> - a protocol containing actions and timelines; - a protocol for conducting odour monitoring. - a protocol for response to identified odour incidents eg complaints; - 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. 	FC	<p>The Operator has provided information to support compliance with BATc 15. We have assessed the information provided and we not are satisfied that the Operator has demonstrated compliance with BATc 15.</p> <p>The Operator has an OMP from the past, but there is no record of it being approved by the Agency. In the RFI response (19/12/2024) the Operator declared that an external contractor will be writing an Odour Management Plan early in 2025, which will need assessing and approving by the Agency.</p>

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			We have included an Improvement Condition (IP7) to provide an Odour Management Plan to support meeting the requirements for BATc 15.
PET FOOD BAT CONCLUSIONS (BAT 16-17)			
16	<p>Energy efficiency – Green fodder only In order to increase energy efficiency in green fodder processing, BAT is to use an appropriate combination of the techniques specified in BAT 6 and of the techniques given below. (a) Use of predried fodder (b) Recycling of waste gas from the dryer (c) Use of waste heat for pre-drying Applicable in addition to BAT6</p>	NA	<p>The site does not process green fodder. We are therefore satisfied that BATc 16 is not applicable for this site.</p>
17	<p>Emissions to air – particulates In order to reduce channelled dust emissions to air, BAT is to use one of the techniques given; a. bag filter, b. cyclone.</p> <p>Note: There is no BAT-AEL for dry pet food production. However, we want to set an ELV to ensure this parameter is adequately controlled. These should be based on what the Operator can achieve (if monitoring data is available) and should be in line with the compound animal feed BAT-AELs (10mg/m3 for grinding and/or 20mg/m3 for cooling). However, as it is not a BAT-AEL, no derogation is required if the Operator cannot achieve this. We will ensure they have the correct abatement and set an appropriate ELV with an IC.</p>	CC	<p>The Operator has provided information to support compliance with BATc 17. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 17.</p> <p>The air emission abatement method used in the production process involves capturing particulate matter emitted from: grinders, pellet drier and pellet cooler and passing it through an LEV6 Air Master system. This system controls ventilation by channelling air through a 26-way dust extractor, which then passes through the Biobed filtration system. Dust build-up in the dust extractor goes to waste bins via an auger, which are reintroduced back into the production process. The environmental monitoring equipment in the LEV6 AirMaster system are in need of repair and therefore not being utilised.</p> <p>The Biobed air filtration system is the last stage in the abatement process before discharge to air, but its' primary function is to remove odour.</p> <p>We take this opportunity to include in the consolidated permit the following upper ELVs for:</p>

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			<p>Grinding A1 & A2 – 10 mg/Nm³</p> <p>Also NOTE: per current 2004 permit for biofilter (Table 2.2.2) a limit of PM10 will be carried across.</p> <p>We have included an Improvement Condition (IP10) as a one-off exercise requiring the Operator to report on fine particulate emissions related to grinding (at this site), to increase our understanding of potential health effects. All Operators involved in drying, milling and grinding are being asked to carry out this monitoring.</p>													
Animal Feed Environmental Performance Levels																
EPL	<p>Environmental Performance Level – Energy Consumption for Pet Food</p> <table border="1" data-bbox="284 691 1171 1015"> <thead> <tr> <th>Product</th> <th>Unit</th> <th>Specific energy consumption (yearly average)</th> </tr> </thead> <tbody> <tr> <td>Compound food</td> <td rowspan="3">MWh/tonne of products</td> <td>0.01-0.10 ⁽¹⁾⁽²⁾⁽³⁾</td> </tr> <tr> <td>Dry pet food</td> <td>0.39-0.50</td> </tr> <tr> <td>Wet pet food</td> <td>0.33-0.85</td> </tr> <tr> <td colspan="3"> <p>(1) The lower end of the range can be achieved when pelleting is not applied.</p> <p>(2) The specific energy consumption level may not apply when fish and other aquatic animals are used as raw material.</p> <p>(3) The upper end of the range is 0.12 MWh/tonne of products for installations located in cold climates and/or when teat treatment is used for Salmonella decontamination.</p> </td> </tr> </tbody> </table>	Product	Unit	Specific energy consumption (yearly average)	Compound food	MWh/tonne of products	0.01-0.10 ⁽¹⁾⁽²⁾⁽³⁾	Dry pet food	0.39-0.50	Wet pet food	0.33-0.85	<p>(1) The lower end of the range can be achieved when pelleting is not applied.</p> <p>(2) The specific energy consumption level may not apply when fish and other aquatic animals are used as raw material.</p> <p>(3) The upper end of the range is 0.12 MWh/tonne of products for installations located in cold climates and/or when teat treatment is used for Salmonella decontamination.</p>			FC	<p>The Operator has provided information to support compliance with Environmental Performance Level – Energy Consumption for Pet Food. We have assessed the information provided and we are not satisfied that the Operator has demonstrated compliance with this Environmental Performance Level.</p> <p>The Operator reports on average between March 2021 to 2022, that the site achieved a specific energy consumption of 0.65MWh/Tonne, which is above the EPL range for pet food.</p> <p>We have included an Improvement Condition (IP11) for the Operator to confirm they have achieved specific EPLs for energy consumption, to support meeting the requirements.</p>
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Wet pet food		0.33-0.85														
<p>(1) The lower end of the range can be achieved when pelleting is not applied.</p> <p>(2) The specific energy consumption level may not apply when fish and other aquatic animals are used as raw material.</p> <p>(3) The upper end of the range is 0.12 MWh/tonne of products for installations located in cold climates and/or when teat treatment is used for Salmonella decontamination.</p>																
EPL	<p>Environmental performance level – Waste water discharge for Pet Food</p> <table border="1" data-bbox="284 1265 1207 1366"> <thead> <tr> <th>Product</th> <th>Unit</th> <th>Specific waste water discharge (yearly average)</th> </tr> </thead> <tbody> <tr> <td>Wet pet food</td> <td>m3/tonne of products</td> <td>1.3-2.4</td> </tr> </tbody> </table>	Product	Unit	Specific waste water discharge (yearly average)	Wet pet food	m3/tonne of products	1.3-2.4	NA	<p>We are satisfied BAT-EPL for wastewater discharge is not applicable to this installation. Being a dry pet food manufacturer, there is little water used in the process and the site does not have process water discharges.</p>							
Product	Unit	Specific waste water discharge (yearly average)														
Wet pet food	m3/tonne of products	1.3-2.4														

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

Updating permit during permit review consolidation

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

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

Capacity Threshold

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

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

The Operator has not completed an H1 assessment of emissions for typical figures of production at the time of permitting.

Therefore, we have included an improvement condition within the permit (IP12) 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.

Although renumbered, the emission points to air have not altered and will be included in Table S3.1.

Implementing the requirements of the Medium Combustion Plant Directive

Existing Medium Combustion Plant (1MW-50MW)

We asked the Operator to provide information on all combustion plant on site in the Regulation 61 Notice as follows:

- Number of combustion plant (CHP engines, back-up generators, boilers);
- Size of combustion plant – rated thermal input (MWth)
- Date each combustion plant came into operation

The Operator provided the information in the table(s) below:

Boilers

1. Rated thermal input (MW) of the medium combustion plant.	1.4MWth 'Old Boiler'	1.6MWth 'New Boiler'
2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant).	Boiler 50% annual load (800 hours/ year)	Boiler 50% annual load (800 hours/ year)
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.	Jan 1985	Jan 1999

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.

Particulate Emissions

BAT-AELs are derived for those substances identified as key environmental issues during the BREF review process.

If the Operator has identified current compliance against BAT-AELs we will implement the relevant emission limit value (ELV) from the date of permit issue. This is relevant

for emission points A1, A2 and A3 against BAT 17 for dust emissions from the final points of abatement on site (biofilter stacks and extruder system).

We have retained the previous emission limits values and monitoring requirements for biofilter emissions (Ref: Biofilter stack, point A1) as per variation (BX5174IB, V001).

We have added an Improvement Programme (IP10) for size fractionation of particulate emissions because a BAT-AEL applies for dust emissions to air. The justification for this Improvement Programme is that there are a number of activities within the FDM sector which may result in release of particulates to air e.g. drying, milling and grinding. Overall there is little available information on how much fine particulates are released. This Improvement Programme is a one-off exercise requiring Operators to monitor and report on the fractions of fine particulate (PM₁₀ and PM_{2.5}) emissions and increase our understanding of potential health effects. Where BAT-AELS may apply to multiple emission points e.g. grain milling, we may accept limited representative monitoring rather than expecting them to monitor every single emission point.

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.

Where there is no change to emissions to water

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.

The Operator has identified emissions to water (via boiler blowdown) which have not been assessed in terms of their volume and quality. We have requested an assessment of these emissions to be submitted to the Environment Agency under an Improvement Programme (IP13).

The Operator has confirmed that other than domestic sewerage, uncontaminated surface water, small quantities of fluid from the biofilter and boiler blowdown there are no other discharges to the sewage system.

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.

No site baseline condition was included in the submission.

We have included an Improvement Programme in the permit (IP14) which requires the Operator to submit an updated site condition report which includes baseline soil and groundwater data. See Improvement condition(s) 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 has provided a short risk assessment on the hazardous substances stored and used at the installation (completed on 19/12/2024 and submitted as part of the Request for Further Information). The risk assessment was 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.

The outcomes of the three stage assessment identified that pollution of soil and/or ground water to be unlikely.

Climate Change Adaptation

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

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

The Operator has submitted a climate change adaptation plan (submitted on 19/12/2024 as part of the Request for Further Information), which considers, as a minimum the impact of severe weather on the operations within the installation. We consider the climate change adaptation plan to be appropriate for the installation.

Containment

We asked the Operator via the Request for Further Information (19/12/2024) 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 details of all tanks;

- Tank reference/name
- Contents
- Capacity (litres)
- Location
- Construction material(s) of each tank
- The bunding specification including
 - Whether the tank is bunded
 - If the bund is shared with other tanks
 - The capacity of the bund
 - The bund capacity as % of tank capacity
 - Construction material of the bund
 - Whether the bund has a drain point
 - Whether any pipes penetrate the bund wall
- Details of overfill prevention
- Drainage arrangements outside of bunded 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

We reviewed the information provided by the Operator. We are satisfied that the internal existing tanks and containment measures on site are adequate and the standards set out in CIRIA C736 do not apply.

In the Request for Information (19/12/2024) the Operator verified that there is an underground reception pit on site, in the form of a sump. This sump is used primarily for percolate collection from the Biobed filter, although it is unclear what its condition is.

Annex 3: Improvement Conditions

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

Previous improvement conditions marked as complete in the previous permit.

Superseded Improvement Conditions – Removed from permit as marked as “complete”	
Reference	Improvement Condition
IC1	The Operator shall carry out a review of their maintenance systems. The outcome of the review shall be reported in writing to the Agency and include, but not be limited to: <ul style="list-style-type: none"> - A table summarising the maintenance and inspection programme for all abatement plant and equipment with the potential to effect emissions and efficiency. - Consideration of effectiveness of such maintenance and inspection programmes, including frequency. - A summary of any proposed improvements together with a timetable for implementation of any such improvements to be agreed with the Agency.
IC2	The Operator shall produce and implement an Odour Management Plan having regards to the Agency Technical Guidance Note H4. The plan shall be submitted to the Agency for agreement.
IC3	The Operator shall submit for agreement by the Agency, an Accident Management Plan, having regard to the Agency Sector Guidance Note (IPPC S6.10 Sections 2.8)
IC4	The Operator shall collect and present data to factually demonstrate the correlation between performance of the biofilter at reducing odour emissions and operational parameters. The data collected shall include but not be limited to the following parameters: <ul style="list-style-type: none"> - Nutrient levels in the biomass - Pressure drop across the biofilter - Volume of water sprinkled onto the biomass - Temperature of the biomass Such data shall be reviewed with the purpose of setting optimal operating ranges for biofilter parameters to reduce odour emissions to a minimum. Proposal shall be made for monitoring of parameters. A report detailing the data and review shall be submitted in writing to the Agency for agreement.
IC5	The Operator shall develop a written Site Closure Plan with regards to the requirements set out in Section 2.11 of the Agency Guidance Note (IPPC S6.10) for the Food and Drink Sector. Upon completion of the plan a summary of the document shall be submitted to the Agency in writing.
IC6	The Operator shall develop and implement a documented system of management techniques, having regards to the Agency Sector Guidance Note (IPPC S6.10 Section 2.3)

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

Improvement programme requirements		
Reference	Reason for inclusion	Justification of deadline
IP7	<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 1 and 15.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement.</p>	3 months from date of permit issue or as agreed in writing by the Environment Agency
IP8	<p>The Operator shall submit the updated sections of the Environment Management System (EMS), for approval in writing by the Environment Agency, demonstrating the ability to comply with BATc 2 for EMS inventory of inputs and outputs.</p>	3 months from date of permit issue or as agreed in writing by the Environment Agency
IP9	<p>The Operator shall submit, for approval by the Environment Agency, a report demonstrating achievement of the 'Narrative' BAT conclusions as identified in the Food, Drink and Milk Bref published on 4 December 2019 where BAT is currently not demonstrated or achieved. The report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • Methodology applied for achieving BAT • Demonstrating that BAT has been achieved. <p>The report shall address the BAT Conclusions for Food, Drink and Milk Industries with respect to BATc 5 and 6.</p> <p>Refer to BAT Conclusions for a full description of the BAT requirement</p>	3 months from date of permit issue or as agreed in writing by the Environment Agency
IP10	<p>The Operator shall submit a written report to the Environment Agency of monitoring carried out to determine the size distribution of particulate matter in the exhaust gas emissions to air from emission point [A1], identifying the fractions within the PM10 and PM2.5 ranges. The monitoring shall be carried out under representative operating conditions and shall be in accordance with EN ISO 23210 unless otherwise agreed with the Environment Agency.</p>	12 months from permit issue or as agreed in writing by the Environment Agency

IP11	<p>The Operator shall confirm in writing to the Environment Agency that they have achieved the specific Environmental Performance Levels (EPLs) for specific energy consumption, where compliance with the EPL was not demonstrated at the time of R61 submission.</p> <p>Where an Operator cannot achieve the EPL, they should provide a justification and derive a site specific benchmark.</p> <p>Refer to BAT Conclusions for a full description of the requirements.</p>	3 months from date of issue or as agreed in writing by the Environment Agency
IP12	<p>The Operator shall review and update the H1 risk assessment for particulate emissions to air at the capacity levels stated within table S1.1 of this permit. The H1 shall be submitted to the Environment Agency for review.</p>	6 months from date of permit issue or as agreed in writing by the Environment Agency
IP13	<p>The Operator shall review the disposal of boiler blowdown, biofilter condensate from the installation. Following the assessment the operator shall submit the report to the Environment Agency for approval. The report shall include (but not be limited to) the following;</p> <ul style="list-style-type: none"> • An assessment of the impact for the proposed route using the Environment Agency's H1 methodology or similar, taking into consideration the characteristics of the boiler blowdown, biofilter condensate (temperature, pH, suspended solids, metals and any other potentially polluting substances). • Detail the specific arrangements for disposal of the blowdown associated with annual inspection and servicing. • List the options for disposal, justifying the proposed route (disposals not being treated in an onsite or offsite waste water treatment plant should be fully justified). • A proposed timetable for completion of any improvement works required. <p>The Operator shall implement any necessary improvements to a timetable agreed in writing by the Environment Agency.</p>	12 months from date of permit issue or as agreed in writing by the Environment Agency
IP14	<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>	12 months from permit issue