

Permitting Decisions- Variation

We have decided to grant the variation for Greencore Warrington operated by Greencore Prepared Foods Limited.

The variation number is EPR/BO2226IU/V008.

The permit was issued on 12/03/2025.

The variation authorises the following changes to the environmental permit

- The operation of an onsite effluent treatment plant (ETP) for the physico-chemical treatment of process derived wastewater arising from the main onsite activity. The introduction of effluent treatment will introduce the following schedule activity Section 5.4 Part A(1)(a)(ii) *Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment*. The effluent treatment plant will be capable of treating and discharging a flow of up to 1500m³/day to the United Utilities (UU) foul sewer, for which the Operator has a separate discharge consent.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

Purpose of this document

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

- highlights [key issues](#) in the determination
- summarises the decision making process in the [decision considerations](#) section to show how the main relevant factors have been taken into account
- shows how we have considered the [consultation responses](#)

Unless the decision document specifies otherwise, we have accepted the applicant's proposals.

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

Key issues of the decision

Effluent treatment plant

The variation of the permit is for the addition of an onsite effluent treatment plant (ETP) for the physico-chemical treatment of process derived wastewater. The ETP incorporates the use of influent screening, balancing, dissolved air flotation (DAF), and chemical dosing prior to discharging to the United Utilities at the same point as previously used.

A description of the treatment process is set out below;

Influent to the ETP will be composed primarily of waste cleaning waters associated with the CiP (Clean in Place) processes along with drainage from external drains within the vicinity of the ETP. Influent is collected in the existing concrete sump, two pumps working in duty/standby transfer the influent to a primary screen and then a rotating screen to remove solids above 2mm. Solid matter is transferred to a container and transferred to a covered waste container for offsite removal by a third-party contractor for use in anaerobic digestion.

The screened effluent is then pumped into a 352m³ self-bunded (self-bunded to equal 110% of the tank capacity) balance tank. Once the level within the tank reaches a pre-set level two pumps (duty and standby) transfer the effluent to the serpentine flocculator, here the pH is adjusted as needed with caustic and acid along with coagulant and flocculant dosing prior to entering the DAF plant. Within the DAF plant micro bubbles adhere to the flocs which then float to the surface as a sludge layer which is removed at the end of the DAF by travelling scrapers. Sludge removed by the DAF plant will be temporarily collected in a 2m³ tank prior to being pumped to the two sludge tanks. Compressed air will be injected into a base ring plate to prevent settlement on the base. Sludge will be removed from site by a third-party contractor. Treated effluent from the DAF will be gravity fed to an existing an existing concrete sump (TF10). Final effluent will be discharged from the existing discharge point (S1), via a composite sampler and MCERTS flow metre, for further treatment at UU's Warrington North wastewater treatment works.

BAT Assessment

We have compared the operation of the Effluent Treatment Plant (ETP) against the indicative BAT requirements for effluent treatment as listed in the Food, Drink & Milk Industries BREF and the corresponding BAT conclusions. In addition, we have reviewed the operation of the ETP against the relevant Waste Treatment BAT conclusions. The table below compares relevant indicative BAT conclusions from

the FDM BREF and the Waste Treatment BREF with the measures proposed in the application.

Food, Drink & Milk Industries BATc		
Indicative BATc	Indicative BAT description	Key Measures Proposed
2	EMS – inventory of inputs & outputs and Increase resource efficiency and reduce emissions	Submetering is in place across the site to provide insight into energy and water usage across the site. The site has suitable data on the flow, loading and characteristics of the effluent. The effluent is monitored at key parts of the process (prior and after treatment). Energy consumption, raw materials and waste streams are monitored and tracked. The resulting information is used to inform future improvement projects.
3	Monitoring - process parameters for emissions to water	Monitoring of the effluent is undertaken at key points of the process including pre-treatment, monitoring the influent (balance tank outlet) and post treatment (DAF outlet). Continuous monitoring of key parameters (pH, COD, TSS and Sulphate) and weekly sampling of Ammonia of the final effluent prior to discharge to the foul sewer. Throughout the effluent treatment process effluent chemical and flow measurements are undertaken in order to ensure efficient operation of the plant.
4	Monitoring - emissions to water	Not applicable. BATc 4 is on applicable for direct discharges to water. The treated effluent is discharged to the United Utilities foul sewer. The monitoring of chloride is also applicable under BATc 4 for direct discharges for sites that undertake brining processes or cheese/shellfish processing or where chloride is likely to be present in the effluent stream. The site undertakes the softening of water which could be liable to contain concentrations of chloride and as such have assessed the potential impact of the discharge using the H1 methodology. This concluded that chloride concentration emitted from site to watercourse via WwTw was not significant as per Test 2.
7	Water and waste water minimisation	The Operator has demonstrated compliance against BATc 7 through the recovery and reuse of final rinse water which is used as a pre-rinse for the next CiP cycle. Boiler condensate is returned to the hot well and oxygen scavengers are used to reduce the need of chemicals.

		In addition, the Operator uses a number of techniques as listed within BATc 7 b-k. These include, optimising water flow, use of hose guns and triggers to control water flow, segregation of water streams, utilising a 'clean as you go policy' that includes dry cleaning where possible and using high pressure cleaning and low pressure foam/gel cleaning at appropriate locations.
11	Emissions to water - waste water buffer storage	The introduction of the effluent treatment plant includes a new balance tank, which has a capacity of 352m ³ . Should the effluent not meet the discharge requirements the ETP is able to contain enough wastewater with the inlet sump, final sump, the balance tank to enable tankering contractors onto site to remove effluent.
12	Emissions to water - treatment	The introduction of the ETP meets the requirements of BATc 12. BATc 12 requires Operators to use a combination of techniques as listed within the BAT description. The ETP encompasses the following techniques, • Physical separation through the use of screens and rotary screen (2mm). • Equalisation through the balancing of effluent prior to treatment • Neutralisation through the use of pH control • Flocculation to remove solids through the use of a DAF plant. The BAT-AELs as listed under BATc 12 are only applicable for direct discharges to water. As the site discharges the treated effluent to the foul sewer the BAT-AELs are not applicable.
15	Odour - management plan	The Operator has provided a revised odour management plan (OMP) that incorporates the new ETP process. The revised OMP has been assessed as part of the variation and incorporated into the variation notice. The OMP meets the requirements of BATc 15, please see the <u>key issues section</u> on odour below for further details.

Containment

The acid, caustic and coagulant will be stored in 3.5m³ tanks, these will be constructed of polypropylene and will be lidded with a small vent to prevent pressure build up. The tanks are modern and will be double skinned/self-bunded to a volume equal to 110% of the tank capacity, the bund design and construction will align to CIRIA C736. The tanks and bund have a high-level alarm system and remote shut down capabilities. The tanks are situated on hard standing, and all

adjacent drainage leads to inlet to sump. There are routine inspections and planned preventative maintenance.

Odour

The installation has the potential to cause odorous emissions through various stages of the process such as processing raw materials, cooking, and the effluent produced.

The applicant employs a range of controls to reduce odorous emissions such as:

- Cleaning in Place (CIP): as a food and drink site CIP is an ongoing process. Each process has a separate procedure for cleaning equipment.
- Carbon odour abatement for cooking process.
- Waste is collected regularly from site and kept enclosed via lids and covers on compactor and HGVs.
- Effluent treatment plant is sited away from sensitive receptors.

We have reviewed the Odour Management Plan (OMP) and found this to be satisfactory.

Decision considerations

Confidential information

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

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

Identifying confidential information

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

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

Consultation

The consultation requirements were identified in accordance with the Environmental Permitting (England and Wales) Regulations (2016) and our public participation statement.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

devcontrol@warrington.gov.uk – LA – Planning

environmental.health@warrington.gov.uk – LA – Environmental Health

Gillian.Maden@uuplc.co.uk – Sewerage Authorities

concerns@hse.gov.uk – Health and Safety Executive

envpermitting@ukhsa.gov.uk – UK Health Security Agency

debbie.watson@warrington.gov.uk – Director Public Health

The comments and our responses are summarised in the [consultation responses](#) section.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN2 'Defining the scope of the installation' and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.

The extent of the facility is defined in the site plan and in the permit. The activities are defined in table S1.1 of the permit.

The site

The operator has provided a plan which we consider to be satisfactory.

The plan is included in the permit.

Nature conservation, landscape, heritage and protected species and habitat designations

We have checked the location of the application to assess if it is within the screening distances we consider relevant for impacts on nature conservation, landscape, heritage and protected species and habitat designations. The application is within our screening distances for these designations.

We have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

We consider that the application will not affect any site of nature conservation, landscape and heritage, and/or protected species or habitats identified.

We have not consulted Natural England. The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator's risk assessment is satisfactory.

Operating techniques

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

General operating techniques

Please refer to the key issue section above for a summary of the BAT assessment against the Food, Drink & Milk Industries Bref.

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

We consider that the odour management plan is satisfactory and we approve this plan.

We have approved the odour management plan as we consider it to be appropriate measures based on information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary, sooner if there have been complaints arising from operations on site or if circumstances change. This is in accordance with our guidance 'Control and monitor emissions for your environmental permit'.

The plan has been incorporated into the operating techniques S1.2.

Emission limits

No emission limits have been added, amended or deleted as a result of this variation.

Monitoring

Monitoring has not changed as a result of this variation.

Reporting

Reporting has not changed as a result of this variation.

Management system

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Previous performance

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.

Growth duty

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

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

The following summarises the responses to consultation with other organisations, our notice on GOV.UK for the public, and the way in which we have considered these in the determination process.

Responses from organisations listed in the consultation section

Response received from: UK Health Security Agency

Brief summary of issues raised: UKHSA has no significant concerns regarding the risk to the health of the local population from the installation. A history of odour complaints from the site was raised in relation to other onsite activities and the regulatory should be satisfied that there is no increased risk of odours from the new activity.

Summary of actions taken: No action taken.

Response received from: Warrington Borough Council

Brief summary of issues raised: No comments were raised within the consultation response, other than the planning application for the effluent treatment plant was granted and no objections to the proposal.

Summary of actions taken: No action taken.