Permitting Decisions- Bespoke Permit

We have decided to grant the permit for Sarval Limited operated by Sarval Limited.

The permit number is EPR/CP3025SZ/A001.

The permit was granted on 22/12/2025.

The application is for an installation that has the following activities:

- Section 6.8. A(1) (c) - Disposing of or recycling animal carcasses or animal waste other than by rendering or by incineration in a small waste incineration plant, at a plant with a treatment capacity exceeding 10 tonne per day of animal carcasses or animal waste or both in aggregate.
- Section 6.8. A(2) (a) - Disposing of or recycling animal waste by rendering at a plant exceeding 10 tonne per day.
- Section 5.4. A(1) (a) (ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.

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:

- summarises the decision making process in the decision considerations section to show how the main relevant factors have been taken into account
- highlights key issues in the determination
- 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.

Key issues of the decision

Decision considerations

The application submission contains a number of supporting documents that describe the controls and operating techniques at the installation, having regard for Best Available Techniques (BAT) requirements, as specified in our guidance and to ensure compliance with the environmental permit conditions. These key controls and techniques are described in the following sections.

General Management

The installation has a bespoke Environment Management System (EMS) in place which is designed to ensure that environmental management is a high priority within the sites operations. The aims, objectives and targets will be designed to control the environmental aspects and reduce the environmental impacts of the production process.

Odour

The installation has the potential to generate odorous emissions at multiple stages, including raw material handling, rendering operations, wastewater and effluent treatment, as well as during storage and transport.

The operator has implemented a comprehensive odour control strategy in line with **Best Available Techniques (BAT)**, including confirmation that **BAT 21** requirements have been adhered to as of May 2024. A robust **Odour Management Plan (OMP)** is in place and will be reviewed annually, or sooner if a significant number of complaints are received.

Key Odour Control Measures:

- **Abatement Systems:** Three chemical scrubbers are installed and tested regularly, supported by a thermal oxidiser and carbon filter as secondary abatement. Acid scrubbers utilise sulphuric acid (first stage) and sodium hypochlorite/caustic treatment for odorous air.
- **Process Controls:**
    - No process odours are directed to the thermal oxidiser when the combustion chamber temperature is below 850°C.
    - No process odours are directed to boilers when the fire rate is below 30%.
    - High-strength, low-volume odours are treated via pre-incineration scrubbers before incineration by boilers or thermal oxidiser.

- **Specific Process Measures:**
    - Poultry process: Non-condensable gases incinerated by steam-raising boilers with pre-acid scrubber and carbon filter.
    - Feather process: Vapour condensed or incinerated via thermal oxidiser; non-condensable gases treated through scrubbers and boilers.
- **Effluent Treatment:** A Dissolved Air Flotation (DAF) plant removes fats, oils, and solids from wash-down waters before discharge to a neighbouring sewage works.
- **Vehicle Management:** Deliveries use fully enclosed, sheeted bulk tipper trailers or skip wagons, kept covered until unloading. Vehicles are cleaned before leaving site, in line with BAT.
- **Operational Practices:** Deliveries are processed promptly to minimise degradation and odour generation.

Monitoring and Assurance:

- Daily odour assessments and audits using sniff tubes for each scrubber.
- Olfactory checks every four hours during operation.
- Onsite weather station for real-time data.
- Accurate and regular record-keeping.
- Offsite odour monitoring conducted daily at downwind receptors, with findings reported at daily site meetings. Any odour issues trigger immediate investigation and corrective action.

These measures, combined with continuous monitoring and proactive management, provide assurance that odour emissions will be effectively controlled and that the installation meets BAT requirements for odour mitigation.

Noise

The installation has the potential to cause noise emissions through various stages of the process. Potential sources of onsite noise include noise from equipment, machinery, delivery/dispatch vehicles and employees.

There are relevant sensitive receptors to noise close to the installation, however we discussed the overall sites noise potential with the area regulatory officer who confirmed they are not concerned about the sites noise potential at this time, we have therefore, retained the standard noise condition 3.4 in this permit. We do not require a noise management plan as the noise Risk Assessment is sufficient, however should there be any substantiated noise complaints at the installation, we may require a full noise management plan in the future.

Point Source Emissions

Emissions to Air

Emissions to air are via two x 15MWth boilers, one Thermal Oxidiser (odour abatement) and three chemical scrubbers (odour abatement). Scrubber 1 is rated at 20,000 CFM, Scrubber 2 is rated at 35,000 CFM and no 3 is rated at 50,000 CFM. The boilers are dual fuel burners, operating on natural gas or poultry fat. Due to the size of the two boilers, these fall under the scope of the Medium Combustion Plant Directive (MPCD).

The applicant provided an Air Quality Assessment (AQA) which included air dispersion modelling assessing the long term and short term impacts of emissions from the sources identified above on both human health and ecological receptors. The Environment Agency completed an audit of the AQA, this audit concluded we are able to utilise the conclusions for human health for the permit determination.

The assessment is based on a worst-case scenario, assuming continuous release of maximum anticipated emission concentrations over 24 hours, 365 days per year, although actual emissions will be lower and include maintenance shutdowns. The highest predicted ground-level concentrations (GLCs) from five years of meteorological data have been applied for all averaging periods. Nitrogen dioxide (NO_2) levels are calculated using a long-term NO_x to NO_2 conversion rate of 70% and a short-term rate of 35%. Maximum predicted GLCs at any location are compared against relevant Air Quality Standards (AQS), with additional assessment of maximum GLCs at sensitive receptors.

Emissions of NO_2, SO_2, VOCs (as benzene), NH_3, PM10 and H_2S have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

Emissions to Sewer

We have assessed the potential emissions to water from the installation and reviewed the operator's proposed controls. We are satisfied that the operator's response adequately addresses the identified risks and demonstrates compliance with regulatory requirements.

Relevant emission limits have been incorporated into the permit to ensure ongoing protection of water quality and compliance with environmental standards.

MCPD

The requirements of the Medium Combustion Plant Directive (MCPD) have been included as part of the variation. The two boilers are all over 5MWth so the limits have been applied from issue.

The boilers are all dual fuelled and can be fired on both natural gas and tallow.

When the boilers are fuelled on natural gas, we have included a limit for NOx of 200mg/m^3 in line with MCPD and monitoring requirements have been retained as annually.

When the boilers are fuelled on tallow this is classified as a 'Liquid fuel other than gas oil' in the MCPD, we retained the NOx limit of 450mg/m^3 from the previous permit as this is tighter than the MCPD limit. We have included a new limit for particulates of 30mg/m^3 and SO_2 of 350mg/m^3 in line with MCPD, monitoring has been retained as annually.

The boilers on site are utilised for odour abatement, we have therefore included a footnote in the table which states the MCP ELV's will only apply when boilers are not incinerating concentrated odours as this is in line with the MCPD requirements.

Resource Efficiency and Waste Management

Raw Materials

A strict 24-hour treatment window of raw materials is operated at the installation. Raw materials are delivered to the site via tankers before being discharged into the hoppers. In circumstances where multiple raw material trailers arrive simultaneously, a short waiting period of up to two hours may occur before tipping into the hoppers. This is considered operationally acceptable and does not impact compliance. In the event of a major breakdown that prevents processing for an extended period or significantly reduces throughput, contingency measures are in place to divert material to alternative facilities in the following priority order, based on minimising commercial impact:

- A third-party processor specialising in poultry and feather materials.
- A mixed-species Category 3 facility at Sarval Hartshill.
- A Category 1 facility at SecAnim Widnes.

Waste Handling

The facility operates under strict efficiency and waste minimisation principles. Raw material quality is critical for optimal yield, with stringent acceptance criteria agreed with suppliers in advance (as detailed in the BAT assessment). Category 3 materials are quality checked on arrival and processed promptly to prevent degradation and odour. The process generates minimal waste; all ABP material is fully processed, and any incidental waste is dry and classed as general waste. Non-hazardous waste is segregated to maximise recycling, and packaging solutions are regularly reviewed for efficiency.

Waste is stored in a dedicated area (Zone 5) with covered receptacles on appropriate surfacing. Licensed contractors collect waste frequently, and all offsite transfers are correctly coded under EWC and documented in EMSR-007. Waste management companies must provide valid licences, verified by the site SHE controller.

Energy Usage

The installation operates under a comprehensive energy management system, supported by senior leadership. Energy performance is monitored through advanced SCADA systems, providing real-time data on key indicators such as evaporation ratios, kWh per tonne processed, throughput rates, and overall yield.

Deviations are reviewed during daily operational meetings to ensure corrective action.

The site is a participant in the Climate Change Agreement and UK Emissions Trading Scheme (UKETS), with continuous improvement measures implemented and communicated to the regulator and local authority.

Implemented Efficiency Measures

- Waste Heat Recovery: Condensed water from heat processing is returned via pressurised condensate return systems to boilers or hotwells, reducing steam demand.

- Process Optimisation: Installation of a vacuum-operated rotary disc drier for feather processing enables drying at lower temperatures, reducing thermal energy use and improving product digestibility.

- Equipment Upgrades: Replacement of motors with higher-efficiency units to optimise rendering processes.

Best Available Techniques

The operator has referenced the EU Slaughterhouse and Animal By-Product BAT which is not UK law, however we can use this assessment against UK Best Available Techniques in the Slaughterhouses and Animal By-products Industries (2005).

Table 1 – Slaughterhouse and Animal By-Product BAT assessment	
BAT conclusion	**Assessment of the proposal to ensure they are in line with the BAT Conclusion requirements**
BAT 1 Environmental Management System (EMS)	The operator has stated that their EMS is equivalent to the ISO14001 standard. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 1.
BAT 2 Provide training	The operator has confirmed that appropriate training will take place 'on the job' and the responsibility for this training is from a suitable team leader with responsibility for that department. A training matrix is in place to identify different requirements across roles and responsibilities. This is owned by the Quality Manager. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 2.
BAT 3 Use a planned maintenance programme	The operator has confirmed that an electronic pre-planned maintenance system (Fleximaint) is in place, covering all key plant equipment. The system ensures controlled user access, task completion by engineers, and secondary sign-off by senior engineers, with weekly reviews. Critical abatement components are identified, stocked, and standardised for rapid remediation. Routine site checks, including bund inspections, chemical testing, ETP checks, odour monitoring, and SCADA recordings, are managed through the system. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 3.

BAT 4 Apply dedicated metering of water consumption	The operator has confirmed that water metering is in place, with some submetering for mains and borehole supply (primarily borehole). Daily tracking is maintained via a spreadsheet by the Environmental Engineer, with physical readings taken by the Technical Assistant. Metering data supports efficiency assessments and forms part of Group Technical's environmental KPIs. Weekly chemical stock checks are recorded in the "Stocks" spreadsheet tab. Daily silo and fat tank readings are taken and reviewed weekly at minimum. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 4.
BAT 5 Separate process and non-process waste water	The operator has confirmed that process effluent, roof rainwater and run off from clean areas is collected separately. Effluent from processing areas, relevant yard water, odour abatement condensate and any rainwater collected in bunds, is discharged to the offsite sewerage system via an on-site effluent treatment plant ("ETP"). Clean roof rainwater is discharged to a soakaway via a separate system (no potential contamination risk). We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 5.
BAT 6 Remove all running water hoses and repair dripping taps and toilets	The operator has confirmed that water leaks, dripping taps, toilets are maintained quickly. Water is metered and monitored as a site KPI. There are gun controls on hoses in line with BAT – ability to completely close off water via wall valve. There are daily and weekly cleaning logs issued. Prior to water being applied to the area for cleaning, all solids swept up. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 6.

BAT 7 Fit and use drains with screens and/or traps to prevent solid material entering waste water	The operator has confirmed that screens and macerators are used across the installation to effectively manage the movement of process effluent to the ETP. Appropriately sized screens (are used in accordance with existing A1 (2) Permit). Traps and screens are cleaned/scraped regularly throughout the day in support of odour control and plant functionality. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 7.
BAT 8 Dry clean installations and transport by-products dry, pressure cleaning and where necessary hot water supplied from thermostatically controlled steam and water valves	The operator has confirmed that dry cleaning is the preferred method of daily cleaning across relevant internal areas of the processing areas. This is due to the pathogens that can breed in a moist or damp area. All shifts ‘clean as they go’, and spills are cleaned immediately. Some areas are designated dry clean only (feather milling) due to pathogen control described. A shut down is undertaken once a week for hygiene and maintenance window. Hot water is provided for hygiene purposes. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 8.
BAT 9 Apply overfilling protection on bulk storage tanks	The operator has confirmed that fat tanks are provided with overfilling protection. There is a measurement live system in place (SCADA) – this records capacity levels via probes (continuous flow) and alarms when tank reaches 95% capacity. It is the responsibility of the operator to change feed to a nominated empty tank. Dry finished product silos have high levels alarms on them to indicate capacity. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 9.

BAT 10 Provide and use bunds for bulk storage tanks	The operator has confirmed that bunds are provided for all bulk storage tanks where deemed a risk (i.e. some tanks are provided with protection from the contained drainage system. Some liquids would be viscous and remain on the ground). The operator has provided details of bund information in the Site Condition report. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 10.
BAT 11 Implement energy management systems	The operator has confirmed that top level support for all energy management (monitoring, measurement, reporting, KPIs for relevant staff). SCADA monitoring is provided across the site for maximum efficiency monitoring. The installation is part of a Climate Change Agreement. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 11.
BAT 12 Implement refrigeration management systems BAT 13 Operate controls over refrigeration plant running times BAT 14 Fit & operate chill room door closing switches BAT 15 Recuperate heat from the refrigeration plant	BAT 12, BAT 13, BAT 14 and BAT 15 is only applicable to installations with a refrigeration plant. The operator has confirmed that they do not chill any incoming or outgoing product. Therefore, these BAT conclusions are not applicable at the installation.

BAT 16 Use thermostatically controlled steam and water blending valves	The operator has confirmed that thermostatic valves are used on storage tanks to maintain temperature during the colder months where necessary. Thermostatic valves are also used to control temperatures of wash waters to a safe level. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 16.
BAT 17 Rationalise and insulate steam and water pipework	The operator has confirmed that all relevant pipework is insulated. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 17.
BAT 18 Isolate steam and water services	BAT 18 is not applicable at the installation.
BAT 19 Implement light management systems	The operator has confirmed that consideration is given to the use of energy-efficient LED lighting and occupancy patterns to optimise light management across the installation. Lighting is programmable by area and controlled via the SCADA system, ensuring operational efficiency. Light management forms an integral part of the site's overall Energy Management Plan. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 19.
BAT 20 Store animal by-products for short periods and possibly to refrigerate them	The operator has confirmed that there are strict controls from materials for processing delivery, to processing time. This is 24 hours. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 20.

BAT 21 Audit Odour	The operator has confirmed that An OMP is in place, and the site has met all existing A1(2) permit conditions for odour monitoring and control. Odour control measures are robust, incorporating technological and procedural controls: • Three chemical scrubbers undergo odour efficiency testing. • Daily odour assessments and audits are conducted, supported by sniff tubes for each scrubber. • Olfactory checks occur every four hours at designated site points, with data logged alongside weather station readings. • Records include time, date, wind direction, weather, odour source, duration, severity, and corrective actions. Safeguards prevent process odours being directed to the thermal oxidiser below 850°C or to boilers operating below 30% fire rate. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 21.
BAT 22 Design and construct vehicles, equipment and premises to ensure that they are easy to clean	The operator has confirmed that all equipment and premises (including drainage channels beyond the building walls) are designed to be easily cleaned. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 22.
BAT 23 Clean materials and storage areas frequently	The operator has confirmed that the relevant requirements for the processing industry (Meat Hygiene requirements, HACCP systems, 5 S principles) are met for cleaning. Dry cleaning is preferred to control pathogens and/or bacterial spread. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 23.

BAT 24 Implement a noise management system	The operator has confirmed that several noise control measures are implemented at the installation; however, a formal Noise Management Plan is not in place. This is deemed unnecessary due to the absence of noise complaints and the impact being screened out during risk assessment. A complaints log and a written site-wide procedure exist for handling public communications and complaints. This procedure will be expanded to meet forthcoming Environment Agency requirements for formal reporting of accidental releases or incidents, including odour and noise. If there are substantiated noise complaints in the future, then a formal Noise Management Plan would need to be implemented. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 24.
BAT 25 Reduce noise at, e.g. roof extract fans, balance lagoon blowers and refrigeration plants	The operator has confirmed that noise reduction measures are incorporated into purchasing new relevant equipment. Noise and rattling assessed through ongoing PPM checks. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 25.
BAT 26 Replace the use of fuel oil with natural gas, where a natural gas supply is available	Fuel oil is not used at the installation therefore BAT 26 is not applicable.
BAT 27 Enclose animal by-products during transport, loading/unloading and storage.	The operator has confirmed that animal by-products are enclosed during transport, loading/unloading and storage. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT 27.

BAT 28 where it is not possible to treat blood before its decomposition starts to cause odour problems and/or quality problems, refrigerate it as quickly as possible and for as short a time as possible, to minimise decomposition	Blood is not used or stored at the installation, therefore BAT 28 is not applicable.
BAT 29 export any heat and/or power produced which cannot be used on-site.	All heat and power generated on site is utilised internally. Steam used in cooking processes is returned via the Pressurised Condensate Return (PCR) system to boilers or the hotwell; where PCR is absent, condensate is returned through traps to the hotwell. Boilers 1 and 2 are fitted with economisers, enabling feed water pre-heating using discharged hot air when PCR is not operational. Additionally, a Waste Heat Boiler above the thermal oxidiser captures high-temperature exhaust to generate steam for site processes before final discharge to atmosphere. We are satisfied that BAT 29 is not applicable at the installation.

Additional BAT for animal by-products installations	The operator has confirmed that:
operate continuous, dry and segregated collection of animal by-products throughout treatment.	Effective segregation is essential for the process. Feather must be free from contamination and other animal by products (hydrolyser will not operate effectively due to possible fat content).
Use sealed, storage, handling and charging facilities for animal by-products.	In place. All operating areas under sealed, negative pressure controlled buildings/areas.
Where it is not possible to treat animal by-products before their decomposition starts to cause odour problems	A strict 24-hour treatment window of raw materials is operated at the installation. No requirement for refrigeration to control decomposition. This is important for product quality also. Newly processed raw materials will create a better product.
Where inherently malodorous substances are used or are produced during the treatment of animal by-products, pass the low intensity/high volume gases through a biofilter	In place. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT for Animal By-products Installations.

Additional BAT for rendering	The operator has confirmed that:
Totally enclose the rendering line	Lines are operated under negative pressure with all emissions exhausted to odour abatement.
Reduce the size of carcasses and parts of animal carcasses before rendering.	Size reduction to 30mm is provided.
For raw material throughputs greater than, or equal to 50000 t/yr, to use a multiple-effect evaporator to remove water from liquid mixtures.	The installation processes more than 50K tonne of raw material a year. Driers are used to remove water from products and then condensed water is discharged (via ETP). Non condensable gases are destroyed via one of the boilers or the Thermal Oxidiser.
When it has been impossible to use fresh raw materials and thereby to minimise the production of malodorous substances, BAT is to do either of the following:	Raw materials are strictly time controlled and are therefore considered fresh.
Burn the non-condensable gases in an existing boiler and to pass the low intensity/high volume odours through a biofilter or 2 to burn the whole vapour gases in a thermal oxidiser and to pass the low intensity/high volume odours through a biofilter.	Additional controls in line with BAT are applied: When the ‘feather plant’ is operational, the Thermal Oxidiser will be running. If TO is offline and is below the required fire rate there is a carbon filter system. This is provided as a contingency measure. All other emissions from area is processed via odour plant (scrubber) 1. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BAT for Rendering.

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.

We consulted the local authority.

The comments and our responses are summarised in the consultation responses section.

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Health & Safety Executive
- UKHSA
- Local sewerage undertaker
- Animal and Plant Health Agency
- Local Authority

The comments and our responses are summarised in the consultation responses section.

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

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.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under the Industrial Emissions Directive.

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 not within our screening distances for these designations.

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.

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.

Operating techniques for emissions that screen out as insignificant

Emissions of NO_2, SO_2, VOCs (as benzene), NH_3, PM_{10} and H_2S have been screened out as insignificant, and so we agree that the applicant's proposed techniques are Best Available Techniques (BAT) for the installation.

We consider that the emission limits included in the installation permit reflect the BAT for the sector.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this 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.

Raw materials

We have specified limits and controls on the use of raw materials and fuels.

Waste types

We have specified the permitted waste types, descriptions and quantities, which can be accepted at the regulated facility.

We are satisfied that the operator can accept these wastes for the following reasons:

- they are suitable for the proposed activities
- the proposed infrastructure is appropriate; and
- the environmental risk assessment is acceptable.

Emission Limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on Best Available Techniques (BAT) have been added for the following substances:

Emission Points A4 and A5 (natural gas):

- Oxides of Nitrogen – 200 mg/m^3

Emission Points A4 and A5 (tallow):

- Oxides of Nitrogen- 450 mg/m^3
- Carbon dioxide- 150 mg/m^3
- Sulphur dioxide- 350 mg/m^3
- Particulates- 30 mg/m^3

We have included these limits based on the Medium Combustion Plant Directive.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

Emission Points A4 and A5 (natural gas and tallow):

- NOx, SO^2, Particulates (tallow only) and CO – Every 3 years

Emission Points

We have included these monitoring requirements in line with Medium Combustion Plant Directive.

Reporting

We have specified reporting in the permit.

We made these decisions in accordance with the Medium Combustion Plant Directive; Food, Drink and Milk Industries BRef; and Industrial Emissions Directive.

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.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

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.

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 UKHSA (dated: 14/01/2025)

Brief summary of issues raised:

The main emissions of concern from the installation include:

Air emissions: Nitrogen dioxide (NO_2), sulphur dioxide (SO_2), carbon monoxide (CO), particulate matter (PM_{10}, $PM_{2.5}$), ammonia (NH_3), hydrogen sulphide (H_2S), and volatile organic compounds (VOC).

Other emissions: Releases to water and odour.

Summary of actions taken:

<u>Air Emissions</u>

We have fully considered the concerns raised regarding emissions to air, including nitrogen dioxide (NO_2), sulphur dioxide (SO_2), carbon monoxide (CO), particulate matter (PM_{10}, $PM_{2.5}$), ammonia (NH_3), hydrogen sulphide (H_2S), and volatile organic compounds (VOC). We have also reviewed the applicant's modelling approach, receptor inclusion, percentile selection, and compliance with relevant guidance.

The Air Quality Modelling and Assessment Unit (AQMAU) has undertaken a detailed screening of the proposed emissions. Based on this assessment, all predicted contributions have been determined to be insignificant when compared against applicable environmental standards and health-based benchmarks. The modelling demonstrates that the installation will not give rise to unacceptable

impacts at any identified human receptors, including those in the newly developed residential area.

Accordingly, we are satisfied that the applicant's proposals meet the necessary requirements. No additional permit conditions are required beyond standard controls, as the risk from air emissions has been screened out as insignificant.

Odour

We have reviewed the applicant's odour control measures and confirms that the installation will employ acid scrubbers and a thermal oxidiser as part of its odour mitigation strategy. These technologies are recognised as Best Available Techniques (BAT) for odour control in this sector.

A robust Odour Management Plan (OMP) has been submitted by the applicant and thoroughly assessed by us. The OMP is considered satisfactory and will form part of the permit requirements to ensure effective ongoing management of odour risks.

Based on the proposed controls and management measures, we are satisfied that the installation will meet BAT standards for odour and that odour emissions will be controlled to prevent unacceptable impacts at sensitive receptors.

Water Emissions

We have assessed the potential emissions to water from the installation and reviewed the operator's proposed controls. We are satisfied that the operator's response adequately addresses the identified risks and demonstrates compliance with regulatory requirements.

Relevant emission limits have been incorporated into the permit to ensure ongoing protection of water quality and compliance with environmental standards.

Response received from: Director of Public Health (dated: 16/01/2025)

Brief summary of issues raised:

Nottinghamshire County Council acknowledges the current consultation on the environmental permit.

They have reviewed and support the assessment and recommendations provided by UKHSA.

Summary of actions taken:

See response to UKHSA above.