Permitting Decisions- Bespoke Permit

We have decided to grant the permit for McCormick Peterborough operated by McCormick (UK) Limited.

The permit number is EPR/DP3720LF.

The permit was granted on 04/02/2026.

The installation manufactures hot and cold filled sauces, ketchups and condiments including ambient and chilled products for use by major food processes and retailers. Various packaging mediums are used including plastic, pots and thermoformed plastic cartons. Finished goods are transported from site and distributed by a third-party logistics company. The site is operational 24 hours a day, 7 days a week, 363 days a year and has the capacity to run a maximum of 12 kitchens, which is split between 9 non-emulsified kitchens (vegetable raw materials only) and 3 emulsified kitchens (animal and vegetable raw materials). The overall production capacity is 632 tonnes per day.

The activities are permitted under:

- Section 6.8A(1) (d) (ii) Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging) only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day.
- Section 6.8 Part A(1)(d)(iii)(aa) Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed from animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than 75 tonnes per day.
- 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.

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

Best available techniques (BAT) assessment

BAT ref.	Indicative BAT	Key measures proposed
1	Environmental management system (EMS)	The operator has provided information to support compliance with BATc 1. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 1. The operators BAT document indicates: (i) Is covered in their BAT assessment (ii) Is covered in their BAT assessment (iii) Is covered in their BAT assessment (iv) Is covered in their BAT assessment (v) Is covered in their BAT assessment (vi) Is covered in their BAT assessment (vii) Is covered in their BAT assessment (viii) Is covered in their BAT assessment (ix) Is covered in their BAT assessment (x) Is covered in their BAT assessment (xi) Is covered in their BAT assessment (xii) Is covered in their BAT assessment (xiii) Is covered in their BAT assessment (xiv) Is covered in their BAT assessment (xv) Is covered in their BAT assessment (xvi) Is covered in their BAT assessment (xvii) Is covered in their BAT assessment (xviii) Is covered in their BAT assessment

		(xix) Is covered in their BAT assessment (xx) Is covered in their BAT assessment <u>FDM additional EMS BAT:</u> (i) noise management plan (see BAT 13 below) (ii) odour management plan (see BAT 15 below); (iii) inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams (see BAT 2 below); (iv) energy efficiency plan (see BAT 6a below).
2	EMS – inventory of inputs & outputs to increase resource efficiency and reduce emissions.	The operator has provided information to support compliance with BATc 2. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 2. • I. (a) simplified process flow sheets provided 10/10/2025. • I. (b) is covered in their BAT assessment • II is covered in their BAT assessment • III is covered in their BAT assessment within BAT 2 and BAT 3. • IV is covered in their BAT assessment • V is covered in their BAT assessment • VI is covered in their BAT assessment The Operator declared that it is using: • Simplified process flow and a description of process integrated techniques • Information about wastewater streams and characteristics • Monitoring of waste gas streams and characteristics • Detailed (monthly) energy consumption monitoring • Also, identification of waste generation, resource use and monitoring of waste reduction opportunities. Inputs/outputs are monitored and managed via KPI monitoring globally, compared to BAT.
3	Emissions to water – monitor key process parameters	The operator has provided information to support compliance with BATc 3. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 3. BAT 3 document provided which looks to cover BAT 3 of FDM BAT- the operator also used UK Sector Specific Interpretation Guidance on the Food Drink and Milk Industries (FDM) Best Available Techniques (BAT) Conclusions to assist them. They do continuous for flow at key locations and on reviewing BAT 3 again PH is continuously monitored at Two-stage reaction vessel (pre DAF cell), DAF chemical inlet and TE (trade effluent) outlet pH.

		On BAT 3 document provided 10/10/2025 they now confirm continuous monitoring “Final temperature monitoring – located post DAF in the correction tank.”
4	Monitor emissions to water	We are satisfied that BATc 4 is not applicable to this Installation. BATc 4 only applies to direct discharges. The operator only contributes indirect discharge after discharging to the Anglian Waters sewer treatment works.
5	Monitor channelled emissions to air	We are satisfied that BATc 5 is not applicable to this site as the site does not undertake any processes listed in BATc 5 specific to FDM.
6	Energy efficiency	The operator has provided information to support compliance with BATc 6. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 6. For 6a: This is covered in operators main BAT document: the operator advises that while there is no single document that describes the site-specific Energy Efficiency Plan, continuous improvement in energy efficiency is embedded within all their onsite activities and are fundamental to the monitoring and targeting of site utility performance. They have also provided BAT 6 supporting document dated 10/10/2025 which shows that they calculate and track energy and which shows reducing electricity consumption overtime, a target to remain below and also use KPIs. This document also confirms that that are in the process of writing a specific energy efficiency plan. As the applicant is part of a multi-national organisation that has company-wide standards, which when considered in conjunction with corporate mandatory standards set and that it is a newly built facility we are satisfied the applicant considers energy efficiency at this site in line with the requirements of BATc 6 (a). For 6b: Burner regulation and control: the operator advises that their combustion plant operations are optimised through burner control 6 monthly annual balancing and efficiency testing, PPM and inspections in line with the suppliers O&M in conjunction with third parties.

		For cogeneration: the operator advised this technology has been discounted as it does not align with their corporate objectives and carbon roadmap. Energy-efficient motors: the operator advised that energy efficiency of motors was a consideration of the design and operation of the site and the Capex and change management process. Variable speed drives specified on pumps and frequency controllers on motors were implemented where appropriate. Heat Recovery: the operator advised heat is recovered from various parts of the process and is inherent within the design and operation of the individual assets, including reject heat from the chillers and compressors (Phase 1) used to pre-heat boiler feedwater and low grade heat is planned to be recovered for space heating as part of the Phase 2 compressor install. The utility programme will continually review further opportunities in relation to heat recovery, as part of utility reduction measures. Lighting: the operator advised the site has LED units installed as a standard across all production areas and back rooms. Boiler Blowdown: the operator advised boiler blowdown is automated and minimised through TDS controls. Blowdown is undertaken validated via instrumentation to optimise timing of the blowdown. The programme is supported by the embedded facilities function. Optimising steam distribution systems: the operator advised the site is new and all hot and cold water distribution systems have been installed to optimise energy efficiency. Preheating feed water: the operator advised heat is recovered from various parts of the process and is inherent within the design and operation of the individual assets, including reject heat from the chillers and compressors used to pre-heat boiler feedwater. Process control systems: the operator advised PLC and control systems are employed variously for optimisation and track trend parameters; including pressure and temperature, VSDs, time etc. The efficiency of the process is continually reviewed where measures are introduced to optimise the operation of the process, with respect to yield and utility consumption. The CI programme targets energy efficiency measures to deliver year on year improvement in energy efficiency that the site is held accountable to deliver. Reducing compressed air system leaks: the operator advised compressed air systems are optimised and maintained inhouse and in conjunction with third party specialists.

		Reducing heat losses by insulation: the operator advises chilled water and pumps, headers steam, hot and cold pipework have all been installed recently as the site is new so are lagged to high specification. Variable speed drives: the operator advised VSD are installed across the installation and the functions of assets continually evaluated. Multiple-effect evaporation: N/A Use of solar energy: the operator advised on site PV is already installed and will be expanded from the existing 500KW to 2.5MW array.
7	Water and wastewater minimisation	The operator has provided information to support compliance with BATc 7. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 7. Water recycling and/or reuse: The operator has stated that opportunities to recover and reuse water within the process are limited for food safety reasons however are reviewed regularly as part of the McCormick Improvement programme. They advise the Site have a rainwater harvesting tank which is used as the water source for toilets on site. This reduces the mains water supply required for domestic style water use. Optimisation of water flow: The operator has stated that the manufacturing processes are controlled using a combination of set points including temperatures, flow rates, levels etc. The design of the installation incorporates flow meters, and VSD that reduce consumption and minimise discharge. All thermostatically controlled censor taps are in place. Optimisation of water nozzles and hoses: The operator has stated that specific nozzles are used depending on use (for cleaning) to minimise water/chemical consumption. Hose guns and trigger controls employed, and the pressure of the delivery systems is regulated (4 bar or lower) for the needs of the operator in the area. The applicability of this is reviewed in line with food and safety concerns. Segregation of water streams: The operator has stated that the routing and condition of raw, process and surface water drains is known and documented for the site. All process contaminated wastewater is directed to the effluent drains for treatment. Uncontaminated rainwater and site run off is directed to surface water drains which outfall to controlled water.

		Dry cleaning: The operator has stated the site operates a “Clean As You Go” policy and where possible SOPs prescribe dry cleaning techniques which is subject to process confirmation within each area. Dry cleaning only in packing and limited use of floor scrubbers. Pigging system for pipes: The operator has stated a ‘Fluivac’ pigging system is installed to enable product recovery and minimise water consumption/generation of effluent. High-pressure cleaning: The operator has stated high pressure cleaning systems are not employed within the manufacturing area for food safety reasons. Cold water power washers and hand scrubbing are employed externally where applicable and in accordance with food safety. Optimisation of chemical dosing and water use in cleaning-in-place (CIP): The operator has stated CIP is optimised through the use of dosing HACCP and associated set points comprising pH, conductivity, temperature and cleanliness testing that determine chemical dosing required. Low-pressure foam and/or gel cleaning: The operator has stated foaming and dosatron systems are employed to allow more controlled dosing of chemicals and a reduction in rinse water. Their use is incorporated as part of their planned cleaning regimes. Optimised design and construction of equipment and process areas: The operator has stated the site is an existing facility. New project proposals and process layout reconfigurations take into account the hygiene requirements of the process and ensure efficient cleaning can be facilitated. New equipment installations go through change management and HACCP process to identify any potential issues. Cleaning of equipment as soon as possible: The operator has stated cleaning equipment is carried out to prevent product hardening through hygiene operations for specific equipment and as part of their “Clean As You Go” policy. The main cleaning is undertaken during a specific hygiene window due to the proximity of lines and for food safety concerns.
8	Use of harmful substances	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. (a) Proper selection of cleaning chemicals and/or disinfectants is covered in their BAT assessment.

		(b) Reuse of cleaning chemicals in cleaning-in-place (CIP) is covered in the operators BAT assessment. (c) Dry cleaning is covered in the operators BAT assessment. (d) Optimised design and construction of equipment and process areas is covered in the operators BAT assessment.
9	Use of refrigerants	The operator has provided information to support compliance with BATc 9. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 9. Operator BAT assessment indicates: “The site has information within an F-Gas register in a format that is consistent with the F-Gas Regulations. F-gases are only associated air conditioning equipment with all process cooling served by two ammonia plants. The site has in place operations and maintenance programmes determined by the gas type, charge weight and Global Warming Potential that are under contract with a competent third party. The provider will periodically review the compatibility of existing assets to replace with a gas of lower GWP or run to fail and replacement with equipment that use the lowest practical GWP refrigerant gas.” In RFI response 10/10/2025 operator confirmed: All cooling and chilling related to the process is served by two ammonia plants. The only equipment containing F-Gas is within comfort cooling units for areas such as the office spaces and canteen.
10	Resource efficiency	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 is using the following techniques: (a) Anaerobic digestion- Effluent sludge and high strength waste sauce is sent off site for energy recovery via AD plant. (b) Use of residues- Food waste collection is optimised to aid recovery and redistribution. The site continuously reviews options with respect to re-using residues. For some materials it is not currently feasible to achieve reliable segregation from other waste streams that may contain animal by products. It is essential that an in depth review and sufficient trialling is carried out to ensure compliance and to manage the likelihood of contamination. Non conforming product etc is sent for redistribution for human consumption e.g. Fairshare. (c) Separation of residues- Residues are separated at the point of generation so a decision can actively be made on

11	Emissions to water – wastewater buffer storage	The operator has provided information to support compliance with BATc 11. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 11. BAT 11 document provided which risk assesses both their surface water discharge and their trade effluent discharge. In terms of buffer storage specifically: Trade Effluent Buffer storage tank. Site has two balance tanks with up to 2x400m3 buffer capacity to contain trade effluent on site prior to treatment and discharge. Approx 12 hrs headroom at typical site flows is provided by the balance tanks with additional retention volume offered by the reception sump (circa 50 m3). The retention volume provides site with suitable time to isolate any hazardous spillages to the ETP and prevent discharge. They also mention In-line monitoring and use of interceptors. The operator confirmed The site can isolate these pumps sealing the site from the local sewer connection in the event of incident. The operator also confirmed the site has access to Waste Providers that can uplift and safely remove any potential issues that may result in contaminated effluent.
12	Emissions to water - treatment	We are satisfied that BATc 12 is not applicable to this Installation. BATc 12 and the BATc 12 AEL only applies to direct discharges. The operator only contributes indirect discharge after discharging to the Anglian Waters sewer treatment works.
13	Noise – management plan (NMP)	We are satisfied that BATc 13 is not applicable to this Installation. A noise management plan is only required where noise nuisance at sensitive receptors is expected or has been substantiated. There has been no substantiated noise nuisance from the site therefore a NMP is not a requirement for this site.
14	Noise minimisation	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. The operator is using the following techniques: • (a) Appropriate location of equipment and buildings • (b) Operational measures

15	Odour – management plan (OMP)	The operator has provided information to support compliance with BATc 15. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 15. Approved OMP dated 10/10/2025. The operator confirms whilst odour is not a significant issue at the site, odour nuisance potential which considers on-site sources and local receptors, is periodically reviewed as part of the EMS however, and they have an operational Odour Management Plan. Odour is a specific component of the site checks, and a complaints and escalation procedure is in place. They confirm their OMP incorporates all of the required elements.

Air

Consulted AQMAU in relation to the operator Air quality assessment and AQMAU advised: On the basis of Natural England's advice, I don't believe this application will warrant a full audit as it appears to be low risk.

We reviewed the:

- AQA (Redmore Environmental Ltd. Air Quality Assessment. Forli Strada, Peterborough. Reference: 8449r2. Date: 17th October 2024.) and
- NTS (EHS Projects Ltd. McCormick (UK) Ltd Environmental Permit Application. Project number: 2324165. Date of issue: 14/11/2024. Version number: 1.0.).

On the basis of the applicant's assessment, we agree that process contributions from the installation are unlikely to cause an exceedance of the environmental standards at any location of exposure for human health, nor the critical loads and levels at any ecological designation of relevance. The two Cochran boilers (A1 and A2, at 4.2 MWth each) should be permitted to operate for up to 8,760 hours per year at the NO_X emission limit value (ELV) of 100 mg/Nm^3 (referenced to 3% O_2).

In relation to the 2 x 0.388MWth water heaters as these are for domestic use only, they were not included in the air quality assessment. These have been listed in the introductory note only to avoid any confusion as to their purpose.

MCP

During determination we identified that the operator already operates Medium Combustion Plant (MCP) permit EPR/WE2681AB/V002. As a result, they will

surrender the MCP permit, as the MCP plant is being incorporated into this permit.

Activities

During determination we asked the operator to clarify the kitchen lines undertaken at site. As a result, we were able to establish the correct activities and charging- the site has two food and drink related activities consisting of:

Section 6.8A(1) d ii - VEG 9 lines totalling 382 tonnes

Section 6.8 A(1) d iii aa - VEG/Animal 3 lines totalling 250 tonnes

Habitats

A habitats assessment was completed and the conclusions were:

- HRA1 – no likely significant effect.
- Appendix 4 – no likely damaging impact.

As a result, a ‘for information only’ notification email was sent to Natural England rather than consultation.

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:

- Local Authority – Environmental Health
- Health and Safety Executive
- Sewerage Authorities
- UK Health Security Agency

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', 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.

These show the extent of the site of the facility including the discharge points.

The plans show the location of the part of the installation to which this permit applies on that site.

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 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.

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.

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.

Improvement programme

Based on the information on the application, we consider that we need to include an improvement programme.

We have included improvement condition IC1 in relation to surface water risk. As the operator indicated there isn't a shut of valve or means of shutting off the surface water outfall at the south of the site which we deem to be unacceptable containment and increases the risk to the environment, as the surface water drainage which leads to the flood retention pond has a risk of travelling to Orton Pit SAC/SSSI which is just to the east. By putting in this improvement condition this will help mitigate this risk.

We have included improvement condition IC2 in order for the operator to assess alternative cleaning products used onsite to less hazardous substances in order to aid the environment by reducing environmental risk of hazardous substances which may make their way through the sewage treatment works and to further enhance their compliance with BAT 8.

Emission Limits

Emission Limit Values (ELVs) and equivalent parameters or technical measures based on the medium combustion plant directive (MCPD) have been added for the following substance:

- Oxides of Nitrogen (NO and NO2 expressed as NOx)
- The limit is set at 100 mg/m^3 for boilers A1 (new MCP) and A2 (new MCP) and for boilers A6 and A7 with combine to form a new MCP.

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.

We have decided that monitoring should be added for the following parameters, using the methods detailed and to the frequencies specified:

- Oxides of Nitrogen (NO and NO_2 expressed as NO_2) - Periodic reference period and a monitoring frequency of three-yearly under monitoring standard/method BS EN 14792.

- Carbon Monoxide - Periodic reference period and a monitoring frequency of three-yearly under monitoring standard/method BS EN 15058.

These monitoring requirements have been included to comply with the MCPD.

Reporting

We have specified reporting in the permit as per MCPD.

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 Local Authority – Environmental Health

Brief summary of issues raised:

Odour:

- Environmental Health have advised that Odour control conditions should be included in the Environmental Permit to ensure another level of odour control and protection of nearest sensitive receptors (please see Planning Conditions at Appendix 1);
- that this would be expected to be a working document and updated and reviewed regularly taking into account changes in the process, any complaints received, and issues identified during on site monitoring.

Noise:

- Environmental Health have advised that, from assessments submitted in respect of Planning Application 21/01130/DISCHG, it was expected that the cumulative rating level from the whole development area should not exceed background noise levels by more than 5dB. However, site management and practices may be crucial to achieving the predicted noise levels.

  Of particular concern are HGV chiller units, operating during unsociable hours. At similar distribution centres, our Environmental Health Pollution Team have experience of such units resulting in impact on amenity/disturbance at separation distances of a kilometre. This has been a particular impact where vehicles, stationed on site, do not use (or aren't capable of using) electrical hook up facilities for their chiller units.

We are of course aware that you cannot control noise from vehicles on the public highway;
please advise how any noise impacts generated by HGVs, while on the application site, will be mitigated through the setting, implementation and monitoring of permit controls.

Summary of actions taken:

Odour:

- The operator has implemented an odour management plan that we have assessed and approved, in order to prevent and minimise the risk of odour nuisance in accordance with H4 Odour Management guidance and BAT conclusions15 (Odour), in, Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries.
- In addition the following odour condition is within the permit: 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.

Noise:

- We have completed an internal screening process using our Noise Advisory Tool (NAT)- the outcome of this screening indicated that we do not require a formal Noise Impact Assessment (NIA) or Noise Management Plan (NMP) for this permit application.
- The following noise and vibration conditions have been added to the permit:

3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

3.4.2 The operator shall:

(a) if notified by the Environment Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Environment Agency for approval within the period specified, a noise and vibration management plan which identifies and minimises the risks of pollution from noise and vibration;

(b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Environment Agency.

Response received from UK Health Security Agency

Brief summary of issues raised:

The main emissions of potential concern are nitrogen oxides, carbon monoxide, and odours to air. Nitrogen oxides and carbon monoxide are generated from combustion of natural gas in on-site boilers. The applicant has undertaken atmospheric dispersion modelling to demonstrate that concentrations of carbon monoxide and nitrogen dioxide are unlikely to exceed short and long-term environmental quality standards at the location of the nearest residential receptors, and therefore the risk to these receptors is considered to be low.

Various chemicals and food stuffs are stored and processed at the site which have the potential to create odours. Furthermore, the site features an effluent treatment plant which also has the potential to create odours. The applicant details suitable control measures to reduce the likelihood of nuisance odours impacting the nearest residents including installation of odour control units, the enclosed nature of the effluent treatment system and 2 raw materials storage vessels, and refrigeration for materials storage where appropriate.

Sniff testing will be conducted regularly at the site boundary to monitor for off-site odour emissions and the applicant details suitable contingency measures should odours be detected during tests. Off-site odour emissions are therefore considered to be unlikely, and given the nearest residential receptors are located approximately 570m from the site, such emissions would be likely to disperse into the atmosphere to a sufficient degree so that the nearest residential receptors would not be significantly impacted.

Summary of actions taken:

Air emissions:
In relation to air emissions we consulted internally with AQMAU who advised that on the basis of the applicant's assessment, we agree that process contributions from the installation are unlikely to cause an exceedance of the environmental standards at any location of exposure for human health, nor the critical loads and levels at any ecological designation of relevance. The two Cochran boilers (A1 and A2, at 4.2 MWth each) should be permitted to operate for up to 8,760 hours per year at the NOX emission limit value (ELV) of 100 mg/Nm3 (referenced to 3% O2). In addition to this as the 2 x 0.61MWth Fulton boilers are new and A6 & A7 have a shared stack they form an MCP so the same ELV will be implemented on this new MCP also to ensure emissions to air are minimised.

Odour:
- The operator has implemented an odour management plan that we have assessed and approved, in order to prevent and minimise the risk of odour nuisance in accordance with H4 Odour Management guidance and BAT 15 (Odour), in, Best Available Techniques (BAT) Reference Document for the Food, Drink and Milk Industries.

- In addition the following odour condition is within the permit: 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour.
- The area officer confirmed they have received no odour complaints for the site.