Permitting Decisions - Variation

We have decided to grant the variation for Blackdale Mill operated by Ian Mosey (Feed) Limited.

The variation number is EPR/FP3339AZ/V005.

The permit was granted on 18/05/2026.

The variation is for:

- The installation of a new mixer
- A new steam raising boiler, to act as the duty unit
- An additional silo
- A third intake point

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

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

Air Quality Impact Assessment:

The operator submitted an Air Emissions Risk Assessment (AERA) which we have assessed, for both Particulate Matter (PM_{10}) and NOX from the boilers, dryers and vents on site. This was undertaken in accordance with our guidance https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit.

The applicant provided an assessment of the impact of emissions to air with the application which is detailed in document : *"Air Quality Assessment for Environmental Permit Variation".* The operator has assessed the installation's nitrogen oxides and particulate matter emissions to air using the Atmospheric Dispersion Modelling AERMOD.

We have reviewed and determined that the consultant's numerical predictions and conclusions in their air quality assessment can be used for permit determination. A detailed air quality audit by AQMAU was not required.

Human Health receptors:

- The consultant's maximum predicted 1-hour NO_2 and 24-hour PM_{10} process contributions (PCs) are insignificant against the relevant Environmental Standards (ES).
- The annual NO_2, $PM_{10?}$ and $PM_{2.5}$ PCs are 'not insignificant', but the predicted environmental concentrations (PECs) do not exceed the relevant Environmental Standards (ES). These are presented in tables 8-1 to 8-4 of the AQA report.

Habitat sites:

- We note that the consultant has assessed habitat sites within the relevant screening distances of 2km and 10km for Sites of Special Scientific Interest (SSSI) and European sites, respectively. They have identified one relevant ecological receptor: Horse Field SSSI. They did not include local wildlife sites (LWS) in their assessment; however, these are further away from the site than the SSSI so PCs at the LWS are also predicted to be insignificant.
- The consultant's maximum predicted daily NOx, nutrient nitrogen and acid deposition PCs are insignificant against the relevant critical levels and loads. These are presented in Table 8-5 of their AQA report. Annual $NO_{X?}$ PCs are predicted to be 'not insignificant', but PECs are below the critical level.
- Therefore, there should be no damage to the SSSI and local wildlife sites.

Conclusion:

- The process contributions do not lead to any exceedances of the standards (long-term or short-term) for the protection of human health at any relevant exposure location outside of the site; and
- The process contribution is considered to cause 'no likely damage' to the assessed ecological sites.

Boiler Blowdown Water Quality Assessment

Due to an increase in chemical usage associated with boiler blowdown, a surface water risk assessment was required for disodium disulphate, sodium polyacrylate and sodium hexametaphosphate. H1 screening was undertaken using the H1 assessment tool for disodium disulphate and sodium hexametaphosphate, both of which screened out and were not considered to pose a significant risk to the receiving water. Sodium polyacrylate did not screen out at the H1 screening stage and therefore detailed modelling was undertaken. The modelling demonstrated that, to ensure no adverse impact on the receiving water, a discharge limit equivalent to a mean phosphate concentration of 0.65 mg/l is required. The operator confirmed they could meet this requirement via email.

Best Available Techniques (BAT)

The operator provided an assessment of BAT at the site; the table below gives an overview of the techniques used:

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 operator provided an overview of their EMS which is an established management system covering operational control, abnormal operation, inspection and maintenance. Therefore, we are satisfied that the operator demonstrates compliance.
2	EMS – inventory of inputs & outputs to increase resource efficiency and reduce emissions.	The operator has provided detail in supporting information section 5 1A overview. The additional silo supports improved logistics (back-hauling of raw materials) without increasing throughput. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc 2.
3	Emissions to water – monitor key	This conclusion has little relevance to the animal feed industry but there are discharges to a watercourse from blowdown water and storm runoff. We have assessed the information provided and we are

	process parameters	satisfied that the operator has demonstrated compliance with BATc 3.
4	Monitor emissions to water	The site discharges storm water to a tributary of Marrs Beck, which is controlled by a full retention interceptor. Blowdown water and wastewater from onsite Klargesters are also discharged to the Beck. The operator has provided a risk assessment therefore we are satisfied that the operator has demonstrated compliance with BATc 4.
5	Monitoring of channelled emissions to air	There are several permitted continuous vents which all have monitoring systems to stop production in the event of a fault. This noted monitoring satisfies compliance with BATc 5. Emissions to air associated with boilers, coolers and vents have been reassessed as part of the variation.
6	Energy efficiency	The site's energy efficiency plan has been included with the application, and this was reviewed as part of the Reg 61 application. The investment in the new boiler will significantly improve energy efficiency. The mixer constitutes new plant; however, it replaces an existing worn unit with modern, energy-efficient equipment designed to prevent material build-up and reduce cleaning and downtime. This represents an application of BAT through process optimisation and efficient equipment design. We are satisfied that the operator has demonstrated compliance with BATc 6.
7	Water and wastewater minimisation	This conclusion has not been considered in the application as animal feed is a dry process.
8	Use of harmful substances	This conclusion has not been considered in the application as no harmful substances are used in the production of animal feeds or in the maintenance/cleaning of the buildings or plant.
9	Use of refrigerants	This conclusion has not been considered in the application as refrigeration processes are not used in the industry and no ozone depletors will be used in any air conditioning or firefighting equipment on site.
10	Resource efficiency	This conclusion has not been considered in the application as none of the techniques which are listed in BATc10 apply to the production of animal feeds.
11	Emissions to water – wastewater buffer storage	This conclusion has not been considered in the application as animal feed is a dry process.
12	Emissions to water – treatment	This conclusion has not been considered in the application as animal feed is a dry process.

13	Noise management plan (NMP)	Due to the design of the building, the attenuation measures employed and the distance that the nearest receptors are located, a noise management plan is not considered a requirement. We are satisfied that BATc 13 is not applicable to the site.
14	Noise minimisation	The techniques for BATc 13 alongside built-in attenuation measures, ensure satisfactory noise minimisation. We consider the above noise reduction measures satisfactory as to comply with BATc 14.
15	Odour – management plan (OMP)	Professional particulates and odour modelling has been undertaken by Air Quality Consultants. An odour management plan is deemed not necessary due to omission of substantiated odour nuisances. We are satisfied that BATc 15 is not applicable to the site.
17	Emissions to air	The operator has stated the emission requirements for the cooler ducts will be achieved. We are satisfied that the operator has demonstrated compliance with BATc 17.

Storage and Containment

The installation of an additional raw material storage silo has been assessed against the relevant BAT conclusions for the Food, Drink and Milk sector. The silo represents enclosed bulk storage of dry materials and does not introduce new point source emissions or pathways to land or water. The design and operation of the silo are consistent with BAT for storage and containment, which requires materials to be held in fit-for-purpose infrastructure to prevent loss, spills or diffuse emissions. The proposed change does not increase environmental risk and can be adequately controlled through existing management and inspection procedures.

Sewer Discharge:

As the variation is for an increase in boiler blowdown which contains hazardous chemicals, we requested evidence explaining why the site cannot connect to the public foul sewer. Our guidance expects trade effluent to connect to foul sewer where reasonable, subject to the sewerage undertaker issuing a trade effluent consent.

The applicant's response highlighted that their reasonable distance to connect to foul sewer is 165m and there is no foul sewer connection point within this distance. We are satisfied with the applicants' response.

LPG

We have accepted LPG being used as an alternative to natural gas. We have therefore set the 100mg/m^3 Natural Gas NOx ELV instead of the "other gaseous fuels" from the MCPD and have not included an SO2 ELV. SO2 content has been restricted to "Not exceeding 0.1% w/w Sulphur content" in Table S2.1.

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.

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’ and Appendix 2 of RGN2 ‘Defining the scope of the installation’.

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. This shows the extent of the site of the facility including the discharge points. 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, 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, 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.

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

We have reviewed the techniques proposed by the operator and compared these with the relevant technical guidance 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.

General operating techniques

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

The operator has provided information to support compliance with the BAT Reference document. We have assessed the information provided and we are satisfied that the operator has demonstrated compliance with BATc.

Operating techniques for emissions that do not screen out as insignificant

Emissions of Sodium Hexametaphosphate, which rapidly hydrolyses to phosphate cannot be screened out as insignificant. We have assessed whether the proposed techniques are Best Available Techniques (BAT).

The proposed techniques/ emission levels for emissions that do not screen out as insignificant are in line with the techniques and benchmark levels contained in the technical guidance and we consider them to represent appropriate techniques for the facility. The permit conditions enable compliance with relevant BAT reference documents (BREFs) and BAT Conclusions, and Emission Limit Values (ELVs deliver compliance with BAT- Associated Emission Levels (AELs).

Operating techniques for emissions that screen out as insignificant

Emissions of Disodium Disulphate and Sodium Polyacrylate 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.

Fire prevention plan

We haven't requested a Fire Prevention Plan at this time, but we will request one in the future if we consider the site poses a risk of fire.

Improvement programme

The original permit stated improvement conditions. None of these have been completed yet and therefore remain in place in this permit variation.

Emission limits

Emission Limit Values (ELVs) based on Best Available Techniques (BAT) have been added for the following substances:

Phosphate

Monitoring

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

Total Phosphorus – 24-hour flow proportional sample

We made these decisions in accordance with the Water Framework Directive.

Reporting

We have added reporting in the permit for the following parameters:

Total Phosphorus

We made these decisions in accordance with the Water Framework 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.

We only review a summary of the management system during determination. The applicant submitted their full management system. We have therefore only reviewed the summary points. A full review of the management system is undertaken during compliance checks.

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.