

Permitting decisions - Surrender

Purpose of this document

We have decided to accept the Surrender of the permit for the Aintree Petfood Plant operated by Fold Hill Foods (Liverpool) Limited.

The permit number is EPR/RP3604PT/S005.

The decision was issued on 25/06/2026.

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state. We consider in reaching this decision that we have taken into account all relevant considerations and legal requirements.

Purpose of this document

This file note provides a record of the decision-making process. It highlights key issues in the determination and summarises the decision-making process to show how the main relevant factors have been taken into account.

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

Key issues of the decision

The local area officer considers that the surrender application is low risk.

Permitting also accept a low risk surrender due to:

- Limited onsite sources of pollution.
 - Vegetable oil tank was decommissioned and removed in 2016.
 - The two underground storage tanks were disused from at least 2005 and were not used throughout the lifetime of the permit.
 - No bulk storage of fuel.
 - Bulk liquids stored indoors. Tallow, molasses and bulk materials were stored in internal areas which were regularly inspected.

- Tallow and molasses tanks were stored in dedicated bunds and fitted with alarms to alert of potential overflows and drivers were required to be present whilst filling tanks to ensure safe delivery.
- Chemicals and oils were stored in drums and small containers within bunded designated internal storage areas.
- Groundwater investigated in 2014/2015 for BOD¹, TPH², BTEX³ and pH in BH101 and BH102:
 - No analytes were reported above the laboratory detection limit across eight groundwater monitoring rounds, with the exception of a minor exceedance of 14 µg/L on 23 July 2014 in BH101. The subsequent five monitoring rounds were all below the detection limit for this analyte.
 - BH102 was installed to assess potential leaks in the drainage system of the vegetable oil tank (disused since 2016).
- Golder Associates (2015) note that there was no deterioration in groundwater between 2005 and 2014/2015 monitoring rounds.
- The 2016 SCR reported that there had been no reported pollution incidents that may have impacted land since permit issue in 2005.
- There were no reported pollution incidents that may have impacted land between 2016 and Site closure.
- No issues raised with regard spills etc in EA CAR reports.
- Decommissioning and removal of ongoing pollution risk:
 - Leftover unused chemicals and lubricants have been removed.
 - Prior to the site closure works, manufacturing wastes were disposed of by approved contractors.
 - Wastes arising from site closure works were transported offsite for disposal by waste hauliers for reuse, recycling or disposal as appropriate.
 - Upon cessation of production, all process vessels and interconnecting pipelines were emptied and the contents collected and disposed of by an appropriate waste contractor.

¹ Biological oxygen demand.

² Total petroleum hydrocarbons.

³ Benzene, toluene, ethylbenzene, xylenes.

- Process plant and associated equipment was dismantled, and the majority has been transferred off-site. The remaining decommissioned plant (i.e., bakery oven) will be removed by the new owner during redevelopment works.
- The concrete hardstanding remained in place throughout closure works.

It is recognised that the two underground storage tanks were present on the site prior to the commencement of the permitted activity and were not used in connection with the regulated facility during the lifetime of the permit. They were not identified as a directly associated activity in the environmental permit and are therefore considered to form part of the baseline site condition. It has been confirmed that the tanks are empty and have been cleaned.

In accordance with Regulation 25 of the Environmental Permitting (England and Wales) Regulations 2016 and RGN 9, the operator must demonstrate that the necessary measures have been taken to avoid pollution risk resulting from the operation of the regulated facility and to return the site to a satisfactory state, having regard to its condition before the facility was put into operation. We consider that the tanks form part of the baseline condition of the site, on this basis, their presence does not prevent the site from being returned to a satisfactory state and does not preclude permit surrender.

Decision considerations

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.

Pollution risk

We are satisfied that the necessary measures have been taken to avoid ongoing pollution risk from the facility.

Satisfactory state

We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state, having regard to the state of the site before the facility was put into operation.