



Creative Foods Europe Ltd

Environmental Permit Variation

EPR Ref: EPR/CP3105BD/T001

Non-Technical Summary

Document Ref: Attachment C.2.5

Application Date: 9th January 2020

NON-TECHNICAL SUMMARY
CREATIVE FOODS EUROPE LTD, BURTON, UK

NON-TECHNICAL SUMMARY

Application Type: Bespoke Environmental Permit Variation Application

Permit Number: EPR/CP3105BD

Installation address: Burton Plant,
76 Mosley Street,
Burton-upon-Trent,
Staffordshire,
DE14 1DS.

Operations: Production of chilled & ambient cooked sauces, sous vide products and sandwich fillings.

Company House Number: 08493072

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1.0 OVERVIEW

The Burton Plant is located in Burton-upon-Trent, Staffordshire and covers approximately 2.8 hectares. This site is accessed from Mosley Street and the central National Grid reference for the site is SK 24276 23115. There is a mix of land uses/sensitive receptors surrounding the site: to the north is a large brewery; to the east are some residential beyond which is another brewery; to the south is primarily commercial; to the west is a railway and station, a depot, a business park, 'works' and some residential further afield. The primary residential areas are to the east and south-east. The site is within an Air Quality Management Zone for Nitrogen dioxide.

There are several non-statutory sites within 2km of the installation: two Local Nature Reserves, eight Local Wildlife Sites and three Ancient Woodlands. There is a designated site within 10 km of the site. This site is the River Mease Special Area of Conservation (SAC) and the nearest point of the SAC is located approximately 9.6km south-west from the site.

The site is located within several inner source protection zones (Zone 1). It is within 125m of five potable water supply boreholes, one of which is within 20m. The underlying Mercia Mudstone bedrock is not designated as an aquifer. The overlying Superficial Deposit is designated as a high vulnerability Secondary aquifer. The site is within a nitrate vulnerable zone.

The closest surface water feature is Shobnall Brook about 125m to the south-west of the site. This is where the brook appears at the head of a culvert by the railway so it is not known if the brook runs in the culvert under or closer to the site. Peel's Cut is about 940m to the south-east and linked to the River Trent which is about 1.1km to the east. The Trent and Mersey Canal lies approximately 1km to the west. The site is at low risk of flooding from rivers.

2.0 HISTORY

Established in 1991, the company previously known as Atlantic Foods and Flagship Europe was renamed as Creative Foods Europe, and is a subsidiary of the OSI Group.

2010 saw the acquisition of Oasis Foods, manufacturers of high quality mayonnaise, sauces, dressings and dips.

In 2015, Oliver James Foods & Proper Pies, manufacturers of high quality sous-vide products and award winning pastry products joined the Group.

The acquisition of specialist food-to-go manufacturer, Calder Foods, took place in 2016. Their portfolio of chilled and ambient products includes sandwich fillings, marinated meats, sauces, mayonnaise, and dips.

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3.0 PRODUCTION

The site formally manufactured a range of chilled ready meals and chilled cooked sausages. Creative Foods Europe Ltd intent to relocate Oasis Foods, Oliver James Foods, Calder Foods production to the Burton Plant, while maintaining a portion of the existing processing equipment.

Proposed future production under Creative Foods Europe Ltd is broken-down as follows:

- **Kitchen and Sauce Pack (Oasis Foods):**
The site will be producing sauces at 79 Tonnes per day over 6 days.
These will be oil and vinegar based sauces such as mayonnaise and barbecue. These will be packed in dip pots, bottles, buckets and pallets/IBC's.
These products will be ambient.
Annual Tonnage: 24,707.

- **Protein Cooking and Packing (Oliver James Foods):**
The site will be cooking using gas ovens and sous-vide processes at 10.61 Tonnes per day over 6 days.
These products will be packed in bags.
These products will be chilled and frozen.
Annual Tonnage: 3,313.

- **Assembly lines (Calder Foods):**
The site will be assembling sandwich fillings and salads at 32.1 Tonnes per day over 6 days. These products will be chilled.
Annual Tonnage: 10,030.

Total Annual Tonnage: 38,050.

Daily Average Tonnage: 121 over a 6-day week.

4.0 EFFLUENT TREATMENT – EFFLUENT EMISSIONS

Currently, there is no dedicated effluent treatment plant or pre-treatment of process effluents on site. All process and cleaning effluents were discharged, via site fat traps and interceptors, directly to sewer via S1 discharge point to Clay Mills Sewage Treatment Works, under a consent to discharge licence from Severn Trent Water.

Creative Food Europe Ltd are proposing to install a primary effluent treatment plant and make additions to the existing process drainage prior to the recommencement of operations at the site. Treated effluent will be discharged to sewer via S2 discharge point to Clay Mills Sewage Treatment Works, under a trade effluent discharge licence from Severn Trent Water.

Creative Foods Europe Ltd are currently in the process of varying/transferring this consent to discharge with Severn Trent Water Ltd, which would be completed before production begins in April 2020.

See Attachment C.2.2 – Proposed Effluent Treatment for further detail.

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5.0 OTHER EMISSIONS

5.1 EMISSIONS TO AIR

The current permit for the facility includes the operation of two individual 5.7MWth input gas fired boilers used to produce steam for cooking and cleaning processes and formally operated for 8,700 hours per year. Only one of these boilers is operational at any one time, alternating between the two boilers. Occasionally both boilers are brought online if the site requirements were high due to production demands.

Emissions to air are also emitted from two gas Echo Ovens (5.8MWth total), two gas Rack Ovens (4.1MWth total) and a gas Char-grill Oven (0.9MWth) at the site.

This will be unchanged when Creative Foods Europe Ltd begin operations at the site. See Attachment C.3.5 – Air Quality Assessment, carried out for a previous permit variation in 2019, for further information.

5.2 ODOUR CONTROL

There were two types of air filter in place on the ovens, comprising fabric box filters, stacked two deep on a racking system, which intercept the saturated air and removed greases and water vapour. The air is dried and passed through a charcoal filter system for final polishing. This abatement is on the main production extraction system that reduced odour and VOC emissions to air.

This will be unchanged when Creative Foods Europe Ltd begin operations at the site.

The site shall carry out an Odour Assessment once the proposed effluent treatment plant becomes fully operational, and an up-date the Odour Management Plan where necessary.

5.3 NOISE

There would be no significant changes to site infrastructure as a result of operations by Creative Foods Europe Ltd.

The Creative Foods Europe Ltd will submit a comprehensive noise assessment within 6-months of the start date of operations, in accordance with the permit improvement requirement.

5.4 SURFACEWATER

Uncontaminated surface water is directed to the River Trent via a surface water drainage network. No variation to on-site surfacewater drainage would be made by the new operator.

This will be unchanged when Creative Foods Europe Ltd begin operations at the site.

5.5 WASTE

All waste streams, including packing, general waste, food waste and sludge will be segregated on-site and transported off-site to licenced waste facilities as appropriate. No waste would be sent to landfill.

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6.0 COMPLAINTS

This site has not been operated since it was taken over by Creative Foods Europe Limited. The site intends to begin operation in April of 2020.

Site did not receive any complaint regarding odour within 6-years prior to the ceasing of operations in August 2019.

Site did not receive any complaint regarding noise within 1-year prior to the ceasing of operations in August 2019.

7.0 NON-CONFORMANCE

This site has not been operated since it was taken over by Creative Foods Europe Limited and therefore has not generated or been issued with a non-conformance by the authorities.

8.0 E.A. GUIDANCE

This bespoke environmental permit variation application is based on the following Environment Agency guidance documents:

- Guidance notes on Part A – About You
- Guidance notes on Part C2 – General – Varying a Bespoke Permit
- Guidance notes on Part C3 – Variation to a Bespoke Installation Permit
- Guidance notes on Part F1 – Charges and Declarations
- Horizontal Guidance Note H1 Overview Document
 - H1 Annex A – Amenity & accident risk from installations and waste activities
 - H1 Annex D.2 – Discharges to surface waters
 - H1 Annex E - Surface Water Discharges (complex)
 - H1 Annex F – Air Emissions
 - H1 Annex G – Disposal or recovery of waste produced on site
 - H1 Annex H – Global warming potential
 - H1 Annex J – Groundwater
 - H1 Annex K – Cost benefit analysis
 - H1 Software Tool User Guide Version 2.74
- H2 IPPC Guidance Note Energy Efficiency
- H3 (Part 2) Noise Assessment and Control
- H4 Odour Management (2011)
- H5 Site Condition Report – Guidance Note
- H5 Site Condition Report – Word Template
- Guidance: Risk assessments for your environmental permit
- Guidance: Surface water pollution risk assessment for your environmental permit
- Guidance: Air emissions risk assessment for your environmental permit
- Guidance: Groundwater risk assessment for your environmental permit
- Guidance: Control and monitor emissions for your environmental permit
- TGN: How to Comply with your Environmental Permit (EPR1.00) Version 8 (2014)
- TGN: How to Comply with your Environmental Permit: The Food and Drink Sector (EPR 6.10)

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9.0 PERMIT ALTERATIONS

9.1 ORIGINAL PERMIT VARIATION

The first permit variation, issued on 19th September 2019, sought to permit an additional 1.877 MWth input combined heat and power (CHP) gas fired engine as a directly associated activity (DAA) to provide electricity for use on the site. There was no other change to the existing permitted food processing activities as a result of the variation as the facility was in cessation. All other DAA's remained unchanged.

The new CHP plant comes under the Medium Combustion Plant Directive (MCPD) and the requirements of Schedule 25A of the EP Regulations (2018) with immediate effect as it is between 1MWth and <50MWth input and operational after 20th December 2018. It is also a Tranche B Specified Generator as per Schedule 25B of the EP Regulations apply as it generates electricity.

The CHP has been installed and is located to the north of the main factory site and to the east of the services gantry. The existing boiler house is located in the services building to the north-west of the CHP plant. The new CHP plant consists of an existing gas supply system, one engine and generator set, engine coolant systems, an exhaust system, ancillary equipment to run the Low Temperature Hot Water system, a CHP control system and lubricating oil storage, transfer and leak detection system. A second separate dedicated stack of 12m height releases the natural gas combustion emissions from the CHP to atmosphere. No emissions abatement is proposed.

The new CHP plant can provide up to 800kWe and 840kWth at 100% load through the operation of a spark ignition reciprocating gas engine generator unit. The CHP plant is to be operated 24 hours a day with a minimum operation of 8,410 hours per year.

The CHP engine has been installed to reduce the electricity imported by the site and to reduce the site heat demand on the existing two boilers. The heat the CHP engine generates is to be used to heat the water supply to site via a heat exchange radiator which is installed on the 65°C ring main. The CHP is to be run in tandem with the two boilers thus reducing boiler demand but is currently not replacing them entirely.

9.2 PERMIT TRANSFER

In November 2019, a permit transfer application was submitted to the Environment Agency.

This application sought to transfer the above mentioned varied site permit from the previous operator to the new site owner and operator Creative Foods Europe Ltd, which took effect on the 5th December 2019.

Permit	Reference	Issue Date
Original	BO5314IU	24 th December 2014
Variation No.1	BO5314IU/V002	19 th September 2019
Transferred	CP3105BD/T001	5 th December 2019

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9.3 TRANSFERRED PERMIT VARIATION

This non-technical summary has been developed in support of a permit variation, submitted in January 2020, seeks to vary the following parts of the transferred permit:

9.3.1 Schedule 1 – Operations

Schedule 1 Activity (table S1.1)

The current permitted activity, as per Table S1.1: Activities of permit CP3105BD/T001, falls under *Section 6.8: The treatment of animal and vegetable matter and food industries* and permits for:

- the treatment and processing of only animal raw material intended for the production of food or feed – Ref: S6.8 Part A(1)(d)(i).

Creative Foods Europe Ltd are seeking to change this permitted activity to:

- the treatment and processing of animal and vegetable raw materials both in combined and separate products, intended for the production of food or feed – Ref: S6.8 Part A(1)(d)(iii)(aa).

Additionally, Creative Foods Europe Ltd are seeking to add a new second schedule 1 activity to the permit CP3105BD/T001, which would falls under *Section 5.4: Disposal, recovery or a mix of disposal and recovery of non-hazardous waste* and permits for :

- the disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment – Ref: S5.4 Part A(1)(a)(ii).

See Attachment C.2.1 – Schedule 1 Activities for further detail.

Directly Associated Activity (table S1.1)

The following directly associated activities would also change as part of this variation:

- The *Raw Material Storage* DAA would vary as a result of additional manufacturing processes and final products.
- The *Packaging Storage* DAA would vary as a result of additional packaging types and final products.

The following new directly associated activities would be added to the permit:

- A *Bulk Ingredient Storage* DAA as the site intends to install six new 30-tonne bulk storage silos for oil and vinegar.

Additionally, the current *Process Effluent* DAA would also be removed, as it would be replaced by the new schedule 1 activity above.

See Attachment C.3.1 - Directly Associated Activities for further details.

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Improvement Programme Requirements (table S1.3)

The operator shall submit a comprehensive noise assessment within 6 months of the start date of operations, in accordance with improvement requirement No.7 of the permit.

The site shall also submit an updated Noise Management Plan, which would be amended based on the findings of the noise assessment.

9.3.2 Schedule 2 – Waste Types, Raw Materials and Fuels

No changes required to this section (table S2.1).

9.3.3 Schedule 3 – Emissions and Monitoring

Point Source Emissions to Air – Emission Limits and Monitoring Requirements (table S3.1)

Emission point A1 – A11 will remain unchanged as part of this variation.

Monitoring of the following parameters, in relation to emissions to air from the natural gas spark ignition engine (Medium Combustion Plant And Specified Generators), will be carried out within 4 months of the start date of operations and then thereafter once every 3 years:

- Oxides of Nitrogen (NO and NO₂ expressed as NO_x)
- Carbon monoxide

Based on the concentrations of substances in emissions into air as per Schedule 6 of permit CP3105BD/T001. See Section 9.3.6 below for relevant interpretation.

Point Source emissions to water (other than sewer) and land (table S3.2)

Surfacewater drainage emission points W1 – W3 will remain unchanged as part of this variation

Point source emissions to sewer, effluent treatment plant or other transfers off-site (table S3.3)

Both treated process effluent and surface water runoff from external goods storage area via oil water interceptor will be discharged via point S2, as a result of the new proposed primary effluent treatment plant. S1 would no longer be utilised as a discharge point and would be removed from the varied permit.

See Attachment C.2.2 - Proposed Effluent Treatment for further details.

Annual limits (table S3.4)

The surfacewater limits for Mercury and Cadmium will remain unchanged as a result of new operations at the site.

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9.3.4 Schedule 4 – Reporting

No changes required to this section (table S4.1 – S4.4).

9.3.5 Schedule 5 – Notification

No changes required to this section.

9.3.6 Schedule 6 – Interpretation

No changes required to this section.

Concentrations of substances in emissions into air means:

- Two gas boilers: in relation to emissions from combustion processes, the concentration in dry air at a temperature of 273K, at a pressure of 101.3kPa and with an oxygen content of 3% dry for liquid and gaseous fuels other than gas engines or gas turbines, 6% dry for solid fuels;
- CHP gas engine: in relation to emissions from gas engines or gas turbines, the concentration in dry air at a temperature of 273K, at a pressure of 101.3kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 15% for engines and gas turbine MCPs.
- In relation to emissions from non-combustion sources, the concentration at a temperature of 273K and at a pressure of 101.3kPa, with no correction for water vapour content.

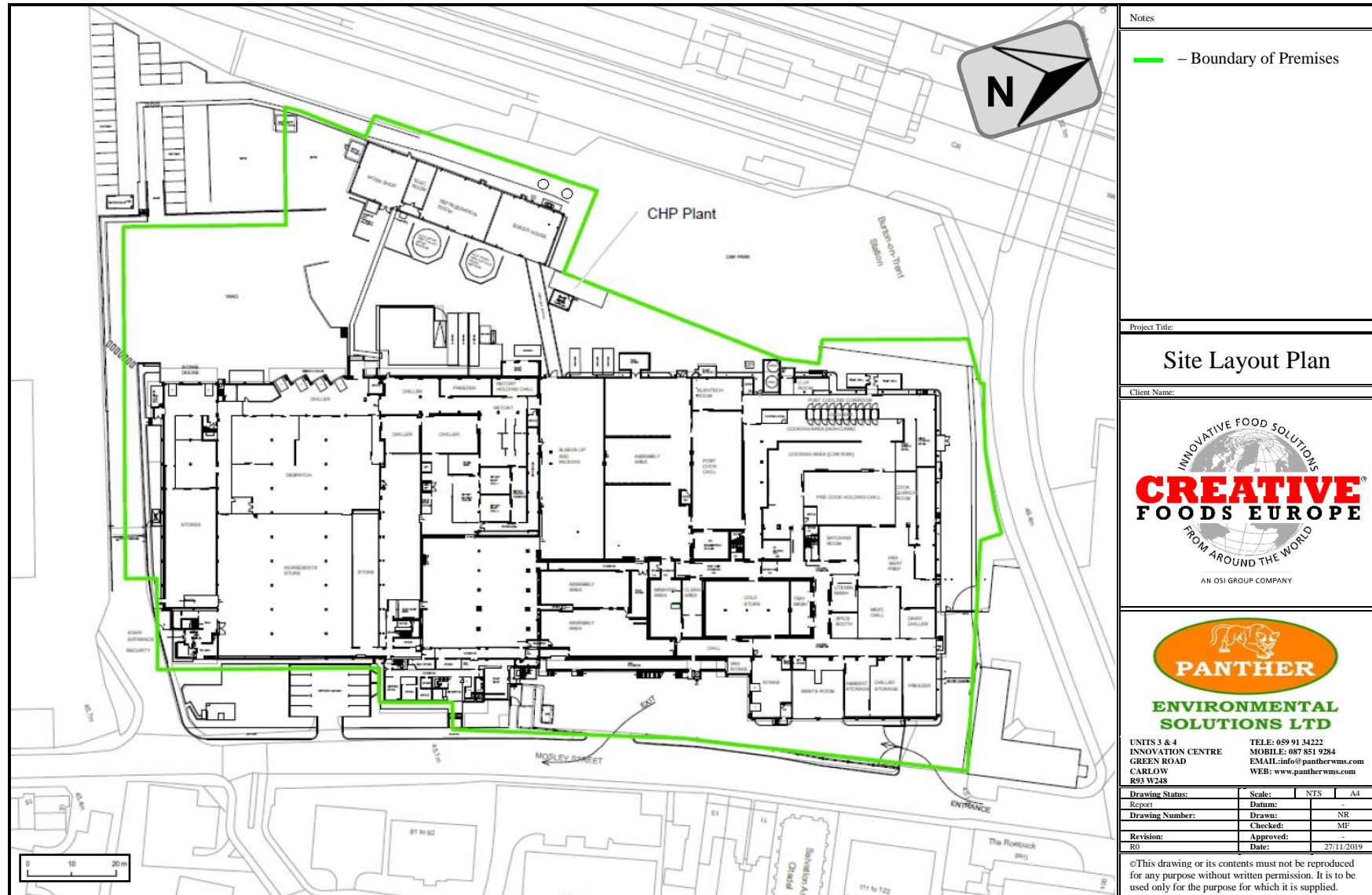
9.3.7 Schedule 7 – Site Plan

No changes required to this section as the site boundary would remain the same.

See Attachment C.2.4 - Site Maps - Burton Plant for further detail.

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Notes

— Boundary of Premises

Project Title:

Site Layout Plan

Client Name:



UNITS 3 & 4
 INNOVATION CENTRE
 GREEN ROAD
 CARLOW
 R93 W248

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