THORNTON PARK MANUFACTURING FACILITY:

ENVIRONMENTAL PERMIT APPLICATION

Environmental Risk Assessment

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1.0 INTRODUCTION

SLR Consulting Limited (SLR) has been instructed by Thorntons Limited to prepare an Environmental Permit (EP) application under the Environmental Permitting (England and Wales) Regulations 2016 (as amended) for the Thorntons manufacturing facility in Alfreton, Derbyshire, DE55 4XJ.

1.1 Report Context

This Environmental Risk Assessment (ERA) has been prepared in support of the EP application. It has been undertaken in accordance with the Environment Agency (EA) guidance[1]. The aim of the assessment is to identify any significant risks arising as a result of the proposed activities and demonstrate that the risk of pollution or harm will be acceptable by implementing appropriate measures to manage these risks.

The guidance requires that all receptors that are near to the site and could reasonably be affected by the proposed activities are identified and considered as part of the ERA. Thus, for the purpose of this report:

- a 10km radius has been adopted in reviewing potentially sensitive international receptors of ecological importance;
- a 2km radius has been adopted in reviewing potentially sensitive national receptors of cultural and ecological importance; and
- a radius of 500m from the proposed permit boundary has been adopted for all other potentially sensitive receptors (for example, residential, commercial, industrial, agricultural and surface water receptors).

1.2 Site Operations

The activities on site involve the manufacture of c. 91 tonnes of chocolate and confectionary products per day. The manufacturing process involves the following:

- Receipt and storage of raw materials;
- Chocolate and confectionary manufacture;
- Packaging and storage of manufactured chocolates and confectionary products;
- Basic treatment (settlement) of process effluent on-site prior to consented discharge to municipal sewer.

In addition, Thorntons subcontracts the delivery of its products to customers to an appointed specialist fleet operator. The facility has refuelling facilities on-site for the fuelling of HGVs with diesel.

Therefore, this application seeks to permit the facility under Section 6.8 A(1)(d) of the Environmental Permitting (England and Wales) Regulations 2016 (as amended):

> *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)*
>
> *(iii) Animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished production capacity in tonnes per day greater than –*
>
> *(aa) 75 where [the portion of animal material in percent of weight of the finished production capacity] is equal to 10 or more.*

There are several Directly Associated Activities which support the operations on site including:

[1] https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit

- Combustion in natural gas fired steam and hot water raising boilers;
- Basic treatment of process effluent prior to discharge to sewer;
- Storage of raw materials; and
- Handling of waste.

The site is operational between 24/7, 347 days a year.

1.1 Overview and Approach

This section outlines the procedure that has been followed in the undertaking of the ERA for the Site:

Step One Identify risks and their sources for the Site

Step Two Identify receptors at risk from the Site

Step Three Identify pathways between sources and receptors

Step Four Assess risks relevant to the Site activities and determine if they can be screened out

Step Five State measures proposed to control unacceptably high risks

Step Six Present your assessment

1.2 Step One – Sources and Risks

Step One is a screening step to identify the potential risks to the environment from the proposed development, and their sources. The EA guidance recommends that the operator assess the following risks for all sites:

- any discharge, for example sewage or trade effluent to surface or groundwater;
- accidents;
- odour;
- noise and vibration;
- Fugitive emissions; and
- visible emissions.

Further, for installations the EA guidance states that you assess the following additional aspects, where applicable

- Risks from site's air emissions; and
- Global Warming Impact.

There are several point source emissions associated with the site's operations, including:

- Point source emissions to air from the gas-fired boiler stacks;
- Point source emission to sewer under Severn Trent Water Discharge Consent 006594V;
- Pont source emissions to surface water.

The point source emission to air is assessed in detail in the Air Emissions Risk Assessment, included in Section 6.

There will be no point source emissions to groundwater, surface water or land from the application activities. There will be some storage of packaging waste associated with the activities.

Therefore only consideration of discharge to sewer, odour, noise and vibration, global warming potential (GWP), fugitive emissions (including dust, mud, litter and pests), accidents and storage of waste remains applicable for assessment in this instance.

2.0 ENVIRONMENTAL SITE SETTING AND RECEPTORS

2.1 Site Setting

The site is centred on National Grid Reference SK 41096 54474 on Thornton Park, Somercotes, Alfreton, Derbyshire, DE55 4XJ and is located approximately 2.6km north of Ripley and 15km northeast Derby City Centre. The site is situated within the greater Thornton Park, which is itself located within a mixed residential, industrial and agricultural area.

The site location is illustrated on Drawing 001 Site Location, whilst Drawing 002 shows the site and installation boundary and Drawing 003 shows the Site Layout and Emission Points. Drawing 004 Sources, Pathways and Receptors shows the local receptors such as residential, commercial and industrial whilst Drawing 005 shows receptors of cultural and natural heritage. Drawings are enclosed in Section 3 of this application.

It is accessed via Wimsey Way to the east and Old Swanswick Colliery Road to west through the site. This leads west to the B6179 Derby Road and west to the Venture Crescent Industrial Estate.

A summary of the immediate surrounding land use is provided in Table 1.

Table 1 Surrounding Land Use

Direction	Land Use
North	The A38 beyond which is Oakerthorpe Brook and the town of Alfreton.
East	Woodland, Colliery Plantation and Venture Crescent Industrial Estate
South	Open Land, Sports Ground and beyond that, the town of Swanswick
West	Turnpike Business Park, beyond which is the B6179 and agricultural land.

The immediate surrounding land use is described in detail below.

Commercial/Industrial

The nearest industrial receptor to the site is Venture Crescent Industrial Estate approximately 90m east.

The nearest commercial receptors are located in Turnpike Business Park approximately 20m west.

Residential

The nearest residential properties are located in the conurbation of Alfreton approximately 100m north of the site.

Open Land/Woodland

Woodland lies adjacent to the site's eastern and western borders, whilst open land lies adjacent to the sites southern border.

Agricultural

The nearest agricultural land is situated approximately 500m west of the site boundary. Two farms lie within the vicinity of the site, with Chestnut farm 420m south and Lily Street Farm 600m west.

Local Transport Network

The nearest road is Wimsey Way, which is located adjacent to the eastern site border. Old Swanswick Colliery Road is also adjacent to the site, on the western border. The A38 runs adjacent to the northern site boundary.

Recreational

The closest recreational area to the site is Sleetmoor Playing Field located approximately 160m south from the Installation.

Educational

There are two educational facilities within 500m of the site, David Nieper Academy approximately 360m northeast and Woodbridge Junior School 470m northeast.

2.2 Geology, Hydrogeology and Hydrology

2.2.1 Geology

A review of the British Geological Survey (BGS) map[2] reveals that the site is underlain by a bedrock of Pennine Middle Coal Measures Formation comprising Mudstone, Siltstone and Sandstone formed in fluvial and palustrine environments during the Carboniferous Period approximately 310-318 million years ago. There are no recorded superficial deposits.

2.2.2 Hydrogeology

The bedrock underlying the site is classified as a Secondary A aquifer, defined as "*permeable strata capable of supporting water supplies at a local rather than strategic scale and in some cases forming an important source of base flow to rivers*" on the MAGIC map website.

The MAGIC map reveals that the site is situated within a Minor Aquifer Low.

2.2.3 Hydrology

The nearest surface water feature to the site are the drains located approximately adjacent to the south and east of the site. These are followed by Oakerthorpe Brook, approximately 50m north of the site.

The Flood Map for Planning[3] reveals that the site lies in a Flood Zone 1, which has a less than 1 in 1,000 annual probability of river or sea flooding.

2.3 Ecology

The ecological receptors within 2km and 10km of the site were identified in the EA Cultural and Natural Heritage Screening Report, which is enclosed as Appendix A to this report.

2.3.1 European/International Receptors

The EA Cultural and Natural Heritage Screening Report did not identify any receptors of European/international importance within 10km, including:

- Ramsar Sites;
- Special Areas of Conservation; and

[2] British Geological Survey map, available at www.bgs.ac.uk, accessed in December 2018
[3] Flood Map for Planning, available at https://flood-map-for-planning.service.gov.uk/, accessed in December 2018.

- Special Protection Areas.

2.3.2 Other Ecological Receptors

The screening report identified numerous sites of national and local ecological importance within a 2km radius of the site, including:

- 20 x Local Wildlife Sites (LWS);
  - The closest LWS is the Colliery Plantation adjacent to the east.
- 2 x Local Nature Reserves (LNR);
  - Pennytown Ponds LNR, 1160m east; and
  - Oakerthorpe LNR, 1440m northwest,
- 3 x Ancient Woodland
  - Unnamed Woodland 1025m west;
  - Broadoak Plantation, 1455m southwest; and
  - Carnfield Wood, 1730m northeast.

The screening report confirmed that none of the following receptors are located within 2km of the site:

- National Nature Reserves; and
- Sites of Special Scientific Interest (SSSI)

2.4 Cultural and Natural Heritage

A search on the Multi-Agency Geographical Information for the Countryside (MAGIC) map[4] revealed that there are numerous listed buildings to the north, south and west of the site. The closest is the House of Confinement approximately 565m north of the site.

The search further confirmed that the following receptors are not present within 2km of the site:

- Scheduled Monuments;
- World Heritage Sites;
- Registered Battlefields; and
- Registered Parks and Gardens

2.5 Step Two – Receptors

All local receptors within 500m of the Site, cultural and natural heritage receptors within 2km and internationally important ecological receptors within 10km of the Site are recorded in Table 2.

[4]Multi-Agency Geographical Information for the Countryside Map, available at www.magic.gov.uk, accessed in December 2018

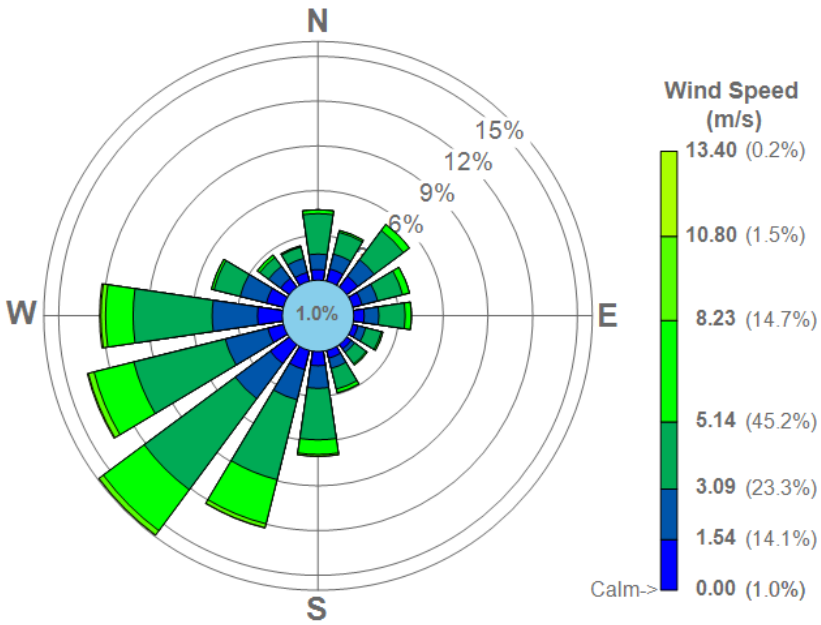
Table 2 Sensitive Receptors

Receptor Name	Receptor Type	Direction	Approximate Distance from Permit Boundary (in metres)
Woodland	Woodland	North, East, West	Adjacent
Old Swanwick Colliery Road	Local Transport Network	West	Adjacent
Wimsey Way	Local Transport Network	East	Adjacent
Open Land	Open Land	South, West	Adjacent
Colliery Plantation	Open Land	East	Adjacent
Drains	Surface Water	South, East	Adjacent
A38	Local Transport Network	North	10
Turnpike Business Park	Commercial	West	20
Oakerthorpe Brook	Surface Water	North	50
Alfreton	Residential	North	55
Recreation Ground	Recreational	North	65
Fire Station	Public Service	West	85
Venture Crescent Industrial Estate	Industrial	East	90
Agricultural Land	Agricultural	North	100
Crematorium	Public	West	100
Sleetmoor House	Residential	West	145
Sleet Moor Playing Field	Recreational	South	160
BP Petrol Station	Industrial	West	170
Allotment Gardens	Recreational	North	175
B6179	Local Transport Network	West	270
A61 Derby Road	Local Transport Network	North	270
Allotment Gardens	Recreational	East	275
Chestnut Farm	Agricultural	South	305
Swanwick	Residential	South	320
Pond	Surface Water	West	324
Alma Watchorn Park	Recreational	North	360
David Nieper Academy	Educational	Northeast	360
Lily Street Farm	Agricultural	West	460
Woodbridge Junior School	Educational	Northeast	470
Cultural and Natural Receptors within 2km of the site			
Local Wildlife Sites	LWS	North, East, South, West	Adjacent
Listed Buildings	Listed Building	North, South, West	565
Pennytown Ponds	LNR	East	1160
Unnamed Ancient Woodland	Ancient Woodland	West	1025
Broadoak Plantation	Ancient Woodland	Southwest	1455
Oakerthorpe	LNR	Northwest	1440
Carnfield Wood	Ancient Woodland	Northeast	1730

2.6 Wind Rose

A wind rose from the Nottingham/Watnall meteorological station, approximately 13km southeast of the site, for the period of 2015 providing the frequency of wind speed and direction is presented in Figure 1 below. The wind rose shows that winds from the southwest are more frequent, with winds from the east and north relatively infrequent.

Figure 1 Wind Rose for Nottingham/Watnall Meteorological Station, 2015



3.0 ENVIRONMENTAL RISK ASSESSMENT

3.1 Step Three – Pathways

Hazards can travel to receptors via numerous pathways, dependent on the nature of the hazard. The pathways for each individual risk are identified in the tables in Section 3.3. Pathways include:

- Air
  - Pest Movement
  - Noise and Vibration
  - Dust Movement
  - Odour Mobilisation
- Land
  - Pest Movement
  - Run-off
  - Percolation via surfacing to land and groundwater

- Water
  - Mobilisation of contaminants
  - Pest Movement

3.2 Step Four – Risk Assessment

The EA Guidance identifies areas that the EA considers would likely require assessment for most sites as follows:

- Amenity and Accidents
- Surface Water
- Air
- Site Waste
- Global Warming Potential
- Groundwater.

Table 3 Air Risk Assessment

What do you do that can harm and what could be harmed?			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Emissions from gas-fired boilers.	Sensitive Receptors identified in Table 2	Air	The gas-fired boilers are subject to regular maintenance and servicing by an appointed third-party specialist. The steam raising boilers are connected to the BMS to ensure efficient operation. The air emissions risk assessment (SLR AERA, May 2019) concluded that the potential impacts of nitrous oxide emissions on air quality as a result of the proposed changes are not significant.	Medium	Harm to human health and local ecosystems.	Low

Table 4 Amenity Risk Assessment and Management Plan

What do you do that can harm and what could be harmed?			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Noise from vehicle movement Noise from production activities	Sensitive Receptors identified in Table 2	Air	The site operations are not expected to give rise to significant levels of noise. All machinery and mobile plant have been designed in accordance with European noise standards. All plant that presents a risk of noise is either located within a building, is surrounded by acoustic enclosures or has sound attenuation/anti-vibration installations All plant benefit from regular preventative maintenance in accordance with the manufacturers manual which prevents excessive noise from plant in disrepair. Site surfacing including roads are maintained in good condition to prevent noise associated with uneven roads. Since the site commenced operations in 1985 only one noise-related complaint has been received. This complaint regarded an	Medium	Nuisance, Harm to human health	Low

			externally sited chiller unit and was promptly addressed by the installation of an acoustic barrier. Vehicles must adhere to a speed limit to minimise noise. Traffic calming measures are employed to ensure a reduced speed. Plant will be operated to minimise noise. All new plant and machinery will be operated and maintained in accordance with manufacturer's specifications. The Site Manager is responsible for ensuring the monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).			
Odour from manufacturing processes, storage of raw materials and waste.	Sensitive Receptors in Table 2	Air	Raw material storage and waste materials will be stored within suitable closed-lidded containers within buildings or dedicated storage areas. Wastes are stored in appropriate waste receptacles at the Installation. Wastes are removed from the Installation on a regular basis by an appointed waste management contractor. Confectionary production activities are undertaken within the confines of the production, warehousing and packaging buildings. Drains benefit from screens and catchpots to prevent food products entering and clogging the drainage system. The drainage systems are regularly cleaned. Good housekeeping is practiced at all times with regular cleaning of operational areas in accordance with food hygiene standards. Thorntons has a cleaning schedule in place for daily and weekly cleaning (document reference TPM HYGIENECLEAN SCH JAN 15 CCH 0653). This includes cleaning for production/operational areas, tanks and associated pumps and pipework, drains and waste bins.	Low	Nuisance	Low

			In the event that odour complaints are received, investigations will be undertaken to determine the cause and appropriate remedial action taken.			
Dust from: Vehicle movements, Material Storage including raw materials, product, chemicals and waste, Site Operations	Sensitive Receptors in Table 2	Air	The raw materials and chemicals stored on site, as well as the product and waste generated on site, are not expected to give rise to significant quantities of dust. All raw materials, chemicals, products and waste are stored in suitable closed containers. Traffic calming measures are implemented to enforce speed limits and reduce emissions of dust. Site access, on-site roads and operational areas will be maintained and repaired to minimise emission of dust due to any uneven surfacing. All manufacturing activities take place within the confines of the enclosed processing buildings. High levels of hygiene are maintained at the Installation; all operational areas are cleaned where necessary to reduce dust emissions. Thorntons has a cleaning schedule in place for daily and weekly cleaning (document reference TPM HYGIENECLEAN SCH JAN 15 CCH 0653). This includes cleaning for production/operational areas, tanks and associated pumps and pipework, drains and waste bins. All vehicles delivering raw materials to or removing waste from the site shall be enclosed or sheeted to minimise emissions of dust. Daily visual inspections of all areas of the site and site boundary will be carried out by Thornton's personnel. In the event that significant visual dust is observed at the boundaries of the operational areas, action will be taken to suppress the dust. A record of the inspection findings and remedial action taken will be recorded in accordance with the EMS.	Low	Nuisance	Low

			The Site Manager is responsible for ensuring monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).			
Pests	Sensitive Receptors in Table 2	Air, land and controlled water	The food grade materials accepted, stored and processed on site are likely to attract pests. To combat this, all food grade materials are stored in sealed containers and tanks, and processing takes place in enclosed buildings to prevent pests being attracted to the site. Wastes are stored in appropriate waste receptacles at the Installation. Wastes are removed from the Installation on a regular basis by an appointed waste management contractor. There is a Pest Control Policy in place at the facility (CQP06 Pest Control Policy). There is also a Group pest control policy in place. The site has appointed a pest control company who regularly visit the site to ensure pest control is adequate. There are currently 4 trained individuals at the Installation (BPCA RSPH level 2 award in Pest Management) who complete quarterly pest control audits of the appointed pest control specialist practices at the Installation. Thorntons is developing, in conjunction with the appointed pest specialist, a training programme for Installation staff, the aim of which is to identify the potential pest issues that may occur at the Installation and to help staff to recognise the signs of pests. If any pests are identified, the appointed pest contractor will take measures to remove these from site, and the cause of the infestation will be investigated. Any repairs to storage areas or processing buildings which are identified as allowing pests to enter buildings will be completed as soon as possible. The Site Manager is responsible for ensuring the monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).	Medium	Nuisance, Harm to human health	Low

Litter from operations Litter from site personnel and waste storage	Sensitive Receptors in Table 2	Land	Confectionary production activities are undertaken within the confines of the production, warehousing and packaging buildings. Raw materials (excluding bulk tanker deliveries) will arrive in suitable packaging and stored in dedicated storage areas. Waste materials are stored in close-lidded containers in dedicated storage areas and regularly removed off-site by an appointed licensed waste management contractor. Production activities are undertaken within the confines of the production, warehousing and packaging buildings. Thorntons has a cleaning schedule in place for daily and weekly cleaning (document reference TPM HYGIENECLEAN SCH JAN 15 CCH 0653). This includes cleaning for production/operational areas, tanks and associated pumps and pipework, drains and waste bins. Good housekeeping procedures will be implemented at the site to minimise the risk of litter build-up. All operational areas will be swept where necessary. Housekeeping procedures will be implemented at the Installation to minimise the risk of litter build-up. The Site boundary will also be regularly inspected for litter by Site personnel. The Site Manager is responsible for monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).	Low	Nuisance, Amenity	Low
Mud	Potentially sensitive receptors including local commercial properties and residential properties.	Land	Vehicular access areas of the site are hard surfaced. Areas of hardstanding will be maintained free of significant quantities of mud and debris. Good housekeeping procedures are implemented at the site to minimise the risk of mud build-up and the risk of mud leaving the site on vehicles. All operational areas and roads will be swept where necessary.	Low	Nuisance, Amenity	Low

			The Site Manager is responsible for monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).			
Runoff from site surfaces	Sensitive Receptors in Table 2	Land, surface water and groundwater	Raw materials, waste materials and fuel (diesel) are stored in suitable sealed containers and provided with adequate containment; these are stored atop hard surfacing either inside buildings or designated external areas. Drip trays are provided at container fill points to contain minor spillages. Run-off from external areas is directed via the surface water drainage system which drains via interceptors prior to off-site discharge to surface water. Internal run off from the Production Building is directed via foul water drains fitted with fat traps, which are emptied, cleaned and visually inspected at least every three months by an appointed third-party specialist, and drain baskets designed to capture solids which are emptied regularly. This drainage is then directed to the on-site effluent treatment plant which comprises fat and grease screens, a settlement chamber and automatic pH adjustment, prior to consented discharge to municipal sewer (Severn Trent Water Limited consent number 006594V). Drain covers are colour coded to distinguish foul from surface water. The Site Manager is responsible for monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).	Medium	Pollution of land and controlled water.	Low
Percolation of Materials	Sensitive Receptors in Table 2	Land, surface water and groundwater	All liquids are stored in sealed containers and tanks and are provided with suitable containment. Liquid containers when in use benefit from drip trays below fill points. Operational areas of the site are surfaced with hard surfacing to prevent the percolation of potentially contaminating materials into the underlying soil and groundwater.	Low	Pollution	Low

			The site surfacing is regularly inspected (daily visual inspection and completion of a weekly inspection checklist record) to ensure it is in good condition. Any weaknesses will be repaired immediately using temporary solutions, with permanent measures implemented as soon as practicable. External run-off is directed to a surface water drainage system which will collect the liquid and pass it through an interceptor prior to its off-site discharge to surface water. Internal run off from the Production Building is directed via foul water drains fitted with fat traps, which are emptied, cleaned and visually inspected at least every three months by an appointed third-party specialist, and drain baskets designed to capture solids which are emptied regularly. This drainage is then directed to the on-site effluent treatment plant which comprises fat and grease screens, a settlement chamber and automatic pH adjustment, prior to consented discharge to municipal sewer (Severn Trent Water Limited consent number 006594V). The Site Manager is responsible for ensuring the monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).			

Table 5 Accidents Risk Assessment and Management Plan

What do you do that can harm and what could be harmed?			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Fire	Sensitive Receptors in Table 2	-	Potentially combustible materials are stored in suitable containers in designated storage areas. A water sprinkler system and fire detection system are in place and is tested regularly. Fire extinguishers are located at key positions around site. Gas shut off valves present in Restaurant and on the steam boilers. There is a dedicated Thorntons Fire Team who receive fire marshal training, this includes all engineers. All Line managers receive fire awareness training. All staff receive induction training which includes fire safety. A Standard Operating Procedure (SOP) for Fire Safety (document ref. SHESOPF01) is in place which details the type fire extinguishers in place, fire safety responsibilities of key staff, actions to be taken in the event of a fire, the need to reduce the risk of fire damage to hazardous substances and flammable liquids are stored, requirement for the completion	Medium	Injury/death. Harm to environment, Harm to human health	Low

			of a fire risk assessment for all storage areas by a competent person and review of these every 3 years. A Fire Risk Assessment is in the process of being completed for the site. In the event of an uncontainable or large fire, the Site manager or a designated deputy will contact the fire service. The EA will be notified as soon as practicable.			
Security and Vandalism	Sensitive Receptors in Table 2	Land, air, surface water	The site is manned during operational hours and benefits from security fencing around the perimeter and manned security gates. Security is also provided out of hours. Visitors are required to report to the manned security gate to gain authorised access to the site. The perimeter fencing will be regularly inspected; weaknesses will be repaired as soon as possible. Tank fill/dispensing point and valves are locked when not in use. A CCTV camera system is in place. Security Guards will report any incidents to the Manager on shift. All buildings will be inspected daily by the operations staff to identify deterioration and damage and the need for any repairs. The buildings will be maintained and repaired to ensure continued integrity. In the event that damage is sustained repairs will be made as soon as possible. The Site Manager is responsible for ensuring the monitoring emissions and implementing remedial action in accordance with the BATOT document (ref. 416.08504.00001/BATOT).	Low	Harm to environment, Harm to human health.	Low
Flooding	Sensitive Receptors in Table 2	Land, Surface Water	The site lies within a Flood Zone 1 which is defined as having a low probability of flooding. Although flooding potential is low, the site benefits from a drainage system capable of handling high water levels.	Low	Nuisance, Harm to environment, Harm to human health.	Low

			The Site Manager is responsible for ensuring the monitoring emissions and implementing remedial action in accordance with the BATOT document (ref. 416.08504.00001/BATOT).			
Spillage or Leakage	Sensitive Receptors in Table 2	Land, Surface Water	All materials on site are stored on hard surfaced areas on the site to help to contain any unplanned releases. Potentially hazardous materials are stored in suitable sealed containers in designated storage areas designed to contain any leaks or spilt materials. When in use storage containers are provided with secondary containment by way of a bunded stillage. Raw food materials delivered to site in bulk are stored in above ground stainless-steel tanks. The tanks benefit from level gauges and the majority with high-level alarms and delivery pipe work with a pipe-in-pipe arrangement and leak detection. Any spillages/leaks from the Ferrero chocolate tank farm will drain via a floor gully to the on-site foul water drainage system. Other raw food grade materials delivered in individual containers are stored in dedicated storage rooms located internally. Material storage areas are inspected visually on a daily basis by site staff to ensure continued integrity. The surface water drainage system is provided with interceptors. The effluent pumping station, which pumps treated effluent to municipal foul sewer, in the event of an unplanned release can be switched off to prevent an unconsented discharge to sewer. The foul water drains serving the Production Building are fitted with fat traps, which are emptied, cleaned and visually inspected at least every three months by an appointed third-party specialist, and drain baskets designed to capture solids which are emptied regularly. Waste materials are stored in skips located on hard surfaced areas in designated areas of the site. Thorntons ensure that	Medium	Harm to environment, Harm to human health.	Low

			the delivered skips are in good condition and are suitable for the containment of the waste. <u>Diesel Tanks</u> Red and white diesel is stored in integrally bunded tanks above ground atop a hard surfaced area. The fill points for the tanks and the dispensing pipework are located within a lockable cabinet which is designed to contain any minor spills/drips from the fill points. These tanks are owned by Thorntons but the refuelling operation and maintenance of these tanks is the responsibility of the appointed third party haulage firm. Risk assessments and method statements for refuelling and tank filling activities are provided by this haulage company to Thorntons. <u>Vehicles and Vehicle Refuelling</u> All delivery vehicles and plant will be supervised by site personnel and monitored for leakages. The refuelling area is located adjacent to the diesel storage tanks to the east of the Packaging Building. The refuelling area benefits from hard surfacing which is cambered to direct runoff from this refuelling area to a drainage gully which drains via an oil interceptor prior into the on-site surface water drainage system and then off-site discharge into the Severn Trent municipal surface water drainage system (via discharge point SW5). <u>Transformers</u> On-site electricity transformers, which are owned by Thorntons, are regularly maintained and serviced by an appointed specialist contractor. Storage areas and plant, including refrigerators and chilling units, are inspected daily for continued integrity.			

			Spill kits are maintained on site. Site personnel are trained in the use of spill kits. Minor spillages will be cleaned up immediately, using proprietary absorbents contained in spill kits to clean up liquids and other spilt materials and placed in alternative containers prior to disposal. In the event of a major spillage immediate action will be taken to contain the spillage and prevent liquid from entering on-site drains and any unsurfaced ground. The spillage will be cleared immediately and placed in containers for off-site disposal and the EA will be notified A detailed description of spill prevention measures in place is provided in the BATOT document in Section 3 of this application. The Site Manager is responsible for monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).			
Ammonia leaks (from refrigeration system)	Sensitive Receptors in Table 2	Air	The ammonia chilling plant is subject to regular maintenance which is undertaken by the equipment supplier. The ammonia system has leak detection which alarms directly to the equipment supplier; the supplier will immediately undertake the required remedial action. The Site Manager is responsible for monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).	Medium	Air pollution, Harm to human health.	Low
Release of gases such as Hydrochlorofluorocarbons from refrigeration plant	Sensitive Receptors in Table 2	Air	Refrigeration plant is subject to regular maintenance by an appointed specialist contractor. The Site Manager is responsible for monitoring emissions and implementing remedial actions, in accordance with the BATOT document (ref. 416.08504.00001/BATOT).	Medium	Air pollution, Harm to human health.	Low

Table 6 Global Warming Potential (GWP)

What do you do that can harm and what could be harmed?			Managing the Risk	Assessing the Risk		
Hazard	Receptor	Pathway	Risk Management	Probability of Exposure	Consequence	What is the overall risk
What has the potential to cause harm?	What is at risk what do I wish to protect?	How can the hazard get to the receptor?	What measures will you take to reduce the risk? Who is responsible for what?	How likely is this contact?	What is the harm that can be caused?	What is the risk that still remains? The balance of probability and consequence
Generation of CO2 emissions	National and global air quality and climate change	Air	The manufacturing activities involve the use of electricity and gas which results in the generation of CO2 emissions (i.e. direct emissions produced as a result of the use of natural gas supplied from the National Grid and indirect emissions as a result of the use of electricity supplied by the National Grid). Thorntons has a Climate Change Agreement (CAA) agreement (agreement reference FDF1/F000211), which has a number of variable targets based on production output. Energy management techniques have been implemented to monitor, record and track energy consumption of the various activities undertaken at the Installation. Thorntons is developing an energy management system and will be seeking ISO5001 certification of this management system in 2020/2021. As part of the Energy Management System, Thorntons has establish energy objectives and targets, monitors energy use, has identified and is implementing energy use reduction/optimisation opportunities. Thorntons	Medium	Harm to environment, Harm to human health	Low

			also purchases for the facility 100% renewable electricity and gas evidenced by Renewable Energy Guarantees of Origin (REGO) and Renewable Gas Guarantees of Origin (RGGO) renewable energy certificates. Submetering (electricity and gas) is undertaken for some elements of the processes at the facility; this enables the monitoring of key energy consuming plant/activities to aid identification of measures to optimise/reduce energy usage. An inventory of energy consumption is maintained via the Carbon Desktop system which is subject to regular review. Energy consumption and the generation of carbon dioxide emissions has been considered in the BATOT document (ref. 416.08504.00001/BATOT).			

4.0 CONCLUSION

To conclude, it is considered that the Installation will not pose a significant risk of harm to sensitive receptors in the vicinity of the Site due to the strict management measures in place.

It is considered that all potential risks and suitable management techniques have been identified.

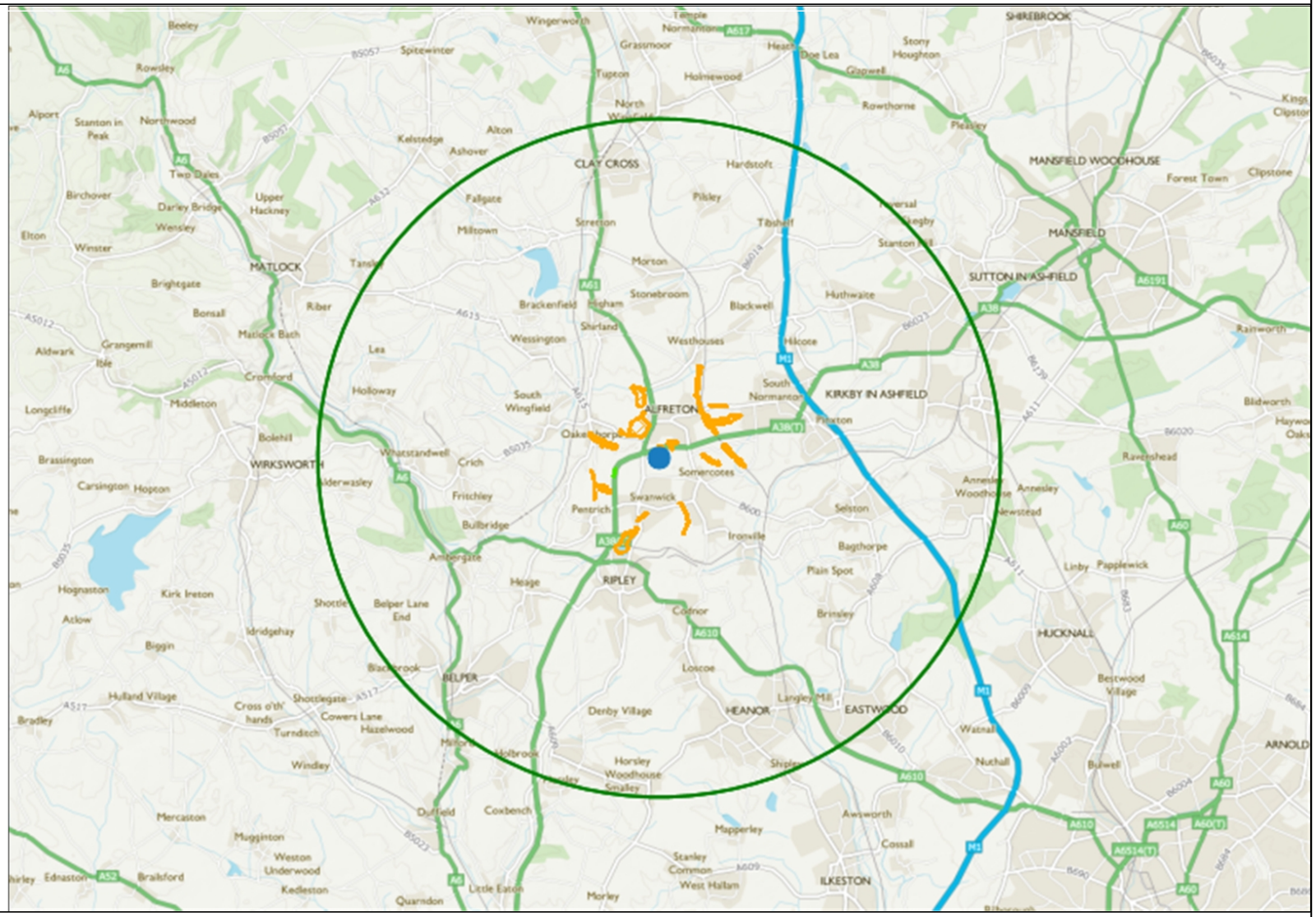
APPENDIX A: ENVIRONMENT AGENCY CULTURAL AND NATURAL HERITAGE SCREENING REPORT

Screening Results for:	IR EPR discharges to air	**Date Produced:**	25/06/2018
Reference number:	WP3639QM	**NGR of search:**	SK 41096 54519
Notes:		**Site centre distance (m):**	240

Environment Agency

Legend

- Search area
- Local Wildlife Sites
- Ancient Woodland (England)
- Ancient Woodland (Wales)
- LNR (England)
- LNR (Wales)



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Screening Results for:	IR EPR discharges to air
Reference number:	WP3639QM
Notes:	

Date produced:	25/06/2018
NGR of search:	SK 41096 54519
Site centre distance (m):	240

Data	Details	Within	Search Direction	Action
Local Nature Reserves - England	Name: Pennytown Ponds (LNR)	1275m	Radial	Consultation with relevant owner may be required
	Name: Oakerthorpe (LNR)	1789m	Radial	
Local Wildlife Sites	Name: Oakerthorpe Local Nature Reserve	1789m	Radial	Take account of the requirements of this site. If there is no data available consult Area
	Name: Oakerthorpe extension to site	1294m	Radial	
	Name: Alfreton Park	810m	Radial	
	Name: Pond Wood, Alfreton	1637m	Radial	
	Name: Nix's Wood	470m	Radial	
	Name: Alfreton Parkway Railway Land	1977m	Radial	
	Name: Alfreton Tunnels Cuttings North	1749m	Radial	
	Name: Carnfield Wood and Outseats	1860m	Radial	
	Name: Carnfield Hill	2167m	Radial	
	Name: Alfreton Tunnels	1802m	Radial	
	Name: Alfreton Tunnels Railway Cutting	1987m	Radial	
	Name: Millstone Lane Road Verge	2039m	Radial	
	Name: Broadoak Plantation Willow Scrub	1794m	Radial	
	Name: Broadoak Plantation	1766m	Radial	
	Name: Butterley Reservoir	2150m	Radial	
	Name: Hickton Road Wood, Swanwick	1670m	Radial	
	Name: Colliery Plantation, Swanwick	128m	Radial	
	Name: Leabrooks Disused Railway	1440m	Radial	
	Name: Pennytown Ponds LNR	1284m	Radial	
	Name: Alfreton Tunnels Cutting South	1913m	Radial	
Ancient Woodland - England	Woodland name: BROADOAK PLANTATION	1765m	Radial	Permit to take account of requirements of this habitat
	Woodland name:	1325m	Radial	
	Woodland name: CARNFIELD WOOD	1847m	Radial	

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NGR of search:	SK 41096 54519
Site centre distance (m):	240

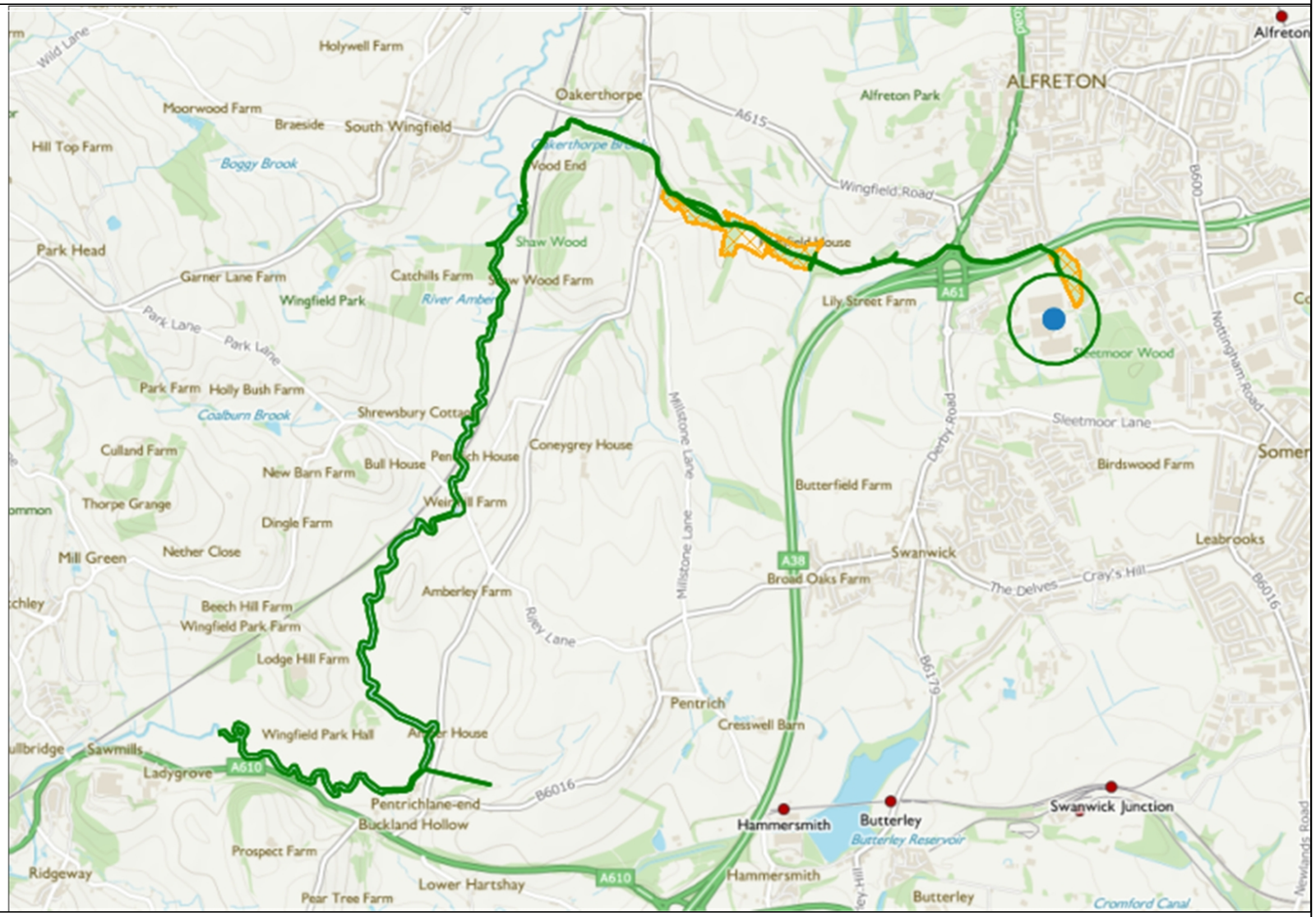
Data	Details	Within	Search Direction	Action
EPR Installation Team	EPR Team: Installations Derbyshire, Derwent and Erewash	0m	Radial	
EPR Waste Team	EPR Team: Waste Derbyshire, Derwent and Erewash	0m	Radial	
EPR Land and Water Team	EPR Team: Land and Water Derbyshire, Derwent and Erewash	0m	Radial	
Counties	County name: Derbyshire County	0m	Radial	
Local Authorities	Name: Amber Valley	0m	Radial	
EA Water Management Areas	Area name: Derbyshire Nottinghamshire and Leicestershire	0m	Radial	
Ancient Woodland - Wales	None present	2000m		
Local Nature Reserves - Wales	None present	2000m		
National Nature Reserves - England	None present	2000m		
National Nature Reserves - Wales	None present	2000m		
Protected Habitats - Reedbeds	None present	500m		
Ramsar Sites - England	None present	10000m		
Ramsar Sites - Wales	None present	10000m		
Special Areas of Conservation - England	None present	10000m		
Special Areas of Conservation - Wales	None present	10000m		
Special Protection Areas - England	None present	10000m		
Special Protection Areas - Wales	None present	10000m		
Sites of Special Scientific Interest - England	None present	2000m		
Sites of Special Scientific Interest - Wales	None present	2000m		

Screening Results for:	IR EPR discharges to water	**Date Produced:**	25/06/2018
Reference number:	WP3639QM	**NGR of search:**	SK 41096 54519
Notes:		**Site centre distance (m):**	240

Environment Agency

Legend

- Search area
- Local Wildlife Sites



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Screening Results for:	IR EPR discharges to water
Reference number:	WP3639QM
Notes:	

Date produced:	25/06/2018
NGR of search:	SK 41096 54519
Site centre distance (m):	240

Data	Details	Within	Search Direction	Action
Local Wildlife Sites	Name: Colliery Plantation, Swanwick	128m	Radial	Take account of the requirements of this site. If there is no data available consult Area
	Name: Oakerthorpe extension to site	1706m	Downstream in the nearest watercourse	
	Name: Colliery Plantation, Swanwick	10m	Downstream in the nearest watercourse	
EPR Installation Team	EPR Team: Installations Derbyshire, Derwent and Erewash	0m	Radial	
EPR Waste Team	EPR Team: Waste Derbyshire, Derwent and Erewash	0m	Radial	
EPR Land and Water Team	EPR Team: Land and Water Derbyshire, Derwent and Erewash	0m	Radial	
Counties	County name: Derbyshire County	0m	Radial	
Local Authorities	Name: Amber Valley	0m	Radial	
EA Water Management Areas	Area name: Derbyshire Nottinghamshire and Leicestershire	0m	Radial	
Local Nature Reserves - England	None present	2000m		
Local Nature Reserves - Wales	None present	2000m		
National Nature Reserves - England	None present	2000m		
National Nature Reserves - Wales	None present	2000m		
Protected Habitats - Wet Woodland	None present	500m		
Protected Habitats - Coastal Saltmarsh	None present	500m		
Protected Habitats - Intertidal mudflats	None present	500m		
Protected Habitats - Aquifer fed water bodies	None present	500m		
Protected Habitats - Chalk rivers	None present	500m		
Protected Habitats - Saline lagoons	None present	500m		
Protected Habitats - Fens	None present	500m		
Protected Habitats - Coastal vegetated shingle	None present	500m		
Protected Habitats - Mudflats	None present	500m		
Protected Habitats - Coastal and Floodplain Grazing Marsh	None present	500m		

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Reference number:	WP3639QM
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Date produced:	25/06/2018
NGR of search:	SK 41096 54519
Site centre distance (m):	240

Data	Details	Within	Search Direction	Action
Protected Habitats - Reedbeds	None present	500m		
Protected Species - Brown trout Salmo trutta	None present	500m		
Protected Species - Sea trout Salmo trutta migratory route	None present	500m		
Protected Species - Smelt Osmerus eperlanus	None present	2000m		
Protected Species - Smelt Osmerus eperlanus migratory route	None present	2000m		
Protected Species - European eel Anguilla anguilla	None present	500m		
Protected Species - European eel Anguilla anguilla migratory route	None present	500m		
Protected Species - Vendace Coregonus albula	None present	2000m		
Protected Species - Whitefish (Powan, Gwyniad, Schelly) Coregonus lavaretus	None present	2000m		
Protected Species - Bullhead Cottus gobio	None present	500m		
Protected Species - Spined loach Cobitis taenia	None present	500m		
Protected Species - Atlantic salmon Salmo salar	None present	500m		
Protected Species - Atlantic salmon Salmo salar migratory route	None present	500m		
Protected Species - Unidentified shad Alosa	None present	2000m		
Protected Species - Twaite shad Alosa fallax	None present	2000m		
Protected Species - Twaite shad Alosa fallax migratory route	None present	2000m		
Protected Species - Allis shad Alosa alosa	None present	2000m		
Protected Species - Allis shad Alosa alosa migratory route	None present	2000m		
Protected Species - Unidentified shad Alosa migratory route	None present	2000m		
Protected Species - River lamprey Lampetra fluviatilis	None present	500m		
Protected species - Unidentified lamprey Petromyzontidae	None present	500m		

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Date produced:	25/06/2018
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Site centre distance (m):	240

Data	Details	Within	Search Direction	Action
Protected Species - River lamprey Lampetra fluviatilis migratory route	None present	500m		
Protected Species - Brook lamprey Lampetra planeri	None present	500m		
Protected Species - Sea lamprey Petromyzon marinus	None present	500m		
Protected Species - Sea lamprey Petromyzon marinus migratory route	None present	500m		
Protected Species - Arctic charr Salvelinus alpinus	None present	2000m		
Protected Species - A diving beetle Agabus brunneus	None present	200m		
Protected Species - A river shingle beetle Bembidion testaceum	None present	200m		
Protected Species - A river shingle beetle Hydrochus nitidicollis	None present	200m		
Protected Species - A river shingle beetle Meotica anglica	None present	200m		
Protected Species - A river shingle beetle Thinobius newberyi	None present	200m		
Protected Species - Depressed river mussel Pseudanodonta complanata	None present	200m		
Protected Species - Fine-lined pea mussel Pisidium tenuilineatum	None present	200m		
Protected Species - Greater water parsnip Sium latifolium	None present	200m		
Protected Species - Hairy click beetle Synaptus filiformis	None present	200m		
Protected Species - Lagoon spire snail Heleobia stagnorum	None present	200m		
Protected Species - Shining rams horn snail Segmentina nitida	None present	200m		
Protected Species - Slender stonewort Nitella gracilis	None present	200m		
Protected Species - Stary stonewort Nitellopsis obtusa	None present	200m		
Protected Species - Southern silver stiletto fly Cliorismia rustica	None present	200m		
Protected Species - Tassel stonewort Tolypella intricata	None present	200m		
Protected Species - Fen raft spider	None present	200m		

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Data	Details	Within	Search Direction	Action
Dolomedes plantarius				
Protected Species - Glutinous snail Myxas glutinosa	None present	200m		
Protected Species - Medicinal Leech Hirudo medicinalis	None present	200m		
Protected Species - Multi-Fruited River-Moss Cryphaea lamyana	None present	200m		
Protected Species - Ribbon-Leaved Water Plantain Alisma gramineum	None present	200m		
Protected Species - River Jelly Lichen Collema dichotomum	None present	200m		
Protected Species - Triangular club-rush Schoenoplectus triqueter	None present	200m		
Protected Species - Triangular club-rush hybrid Schoenoplectus kuekenthalianus	None present	200m		
Protected Species - Water Germander Teucrium scordium	None present	200m		
Protected Species - Water Vole Arvicola amphibius	None present	200m		
Protected Species - Sand Lizard Lacerta agilis	None present	200m		
Protected Species - Natterjack toad Bufo calamita	None present	200m		
Protected Species - Code 4	None present	200m		
Protected Species - Creeping Marshwort	None present	500m		
Protected Species - Code 2	None present	250m		
Protected Species - Marsh Fritillary Butterfly Euphydryas	None present	500m		
Protected Species - White-Clawed Crayfish	None present	500m		
Protected Species - Southern Damselfly	None present	500m		
Protected Species - Desmoulins Whorl Snail	None present	500m		
Protected Species - Narrow-mouthed Whorl Snail	None present	500m		
Protected Species - Geyers Whorl Snail	None present	500m		
Protected Species - Little Whirlpool Rams Horn Snail	None present	500m		

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Data	Details	Within	Search Direction	Action
Protected Species - Floating-leaved Water Plantain	None present	2000m		
Protected Species - Code 3	None present	2000m		
Protected Species - Yellow Marsh Saxifrage	None present	500m		
Protected Species - Code 1	None present	500m		
Protected Species - Petalwort	None present	500m		
Protected Species - Shore dock	None present	2000m		
Protected Species - Slender Green Feather-Moss	None present	2000m		
Ramsar Sites - England	None present	10000m		
Ramsar Sites - Wales	None present	10000m		
Special Areas of Conservation - England	None present	10000m		
Special Areas of Conservation - Wales	None present	10000m		
Source Protection Zone 1	None present	5m		
Source Protection Zone 2	None present	5m		
Source Protection Zone 3	None present	5m		
Special Protection Areas - England	None present	10000m		
Special Protection Areas - Wales	None present	10000m		
Sites of Special Scientific Interest - England	None present	2000m		
Sites of Special Scientific Interest - Wales	None present	2000m		

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