Sarah Lovell
(Consultant working on behalf of Princes Limited)
Princes Limited
Bridge Road Food Factory
Long Sutton
Lincolnshire
PE12 9EQ

Our Ref: EPR/RP3534FP/V004
Date: 22 November 2019

Dear Sarah,

Pre application checks – Enhanced service

I am pleased to provide you with your enhanced level of pre application advice for the Bridge Road Food Factory operated by Princes Limited as requested. The advice has been provided within the number of hours agreed. I can provide additional advice if required, subject to an additional charge.

As discussed I have provided details of the scope of the documents that will need to be provided with your application based upon the changes as outlined in your email of 24/09/19. I have also summarised the key points from the odour telecon that was held on 18/10/19. These should be incorporated into your Odour Management Plan (OMP).

As part of our free basic pre-application advice we provide details of the forms that should be completed for your application, how much it will cost and supporting documents that need to be submitted. I have included this standard advice within your response, the time taken to provide this has not been charged for.

Application fees stated below are based on what has been included in your application and reflect the anticipated effort required to determine the permit. When your application is submitted, it will undergo a duly making check to make sure the correct documents and fee have been submitted. The permitting officer carrying out this check is within their rights to deem whether the level of application fee needs to be adjusted. Please include this letter with your variation application.

From the information you have provided there may be a change to the food and drink listed activity in the permit. The Section 6.8 A(1)(d)(ii) may change to Section 6.8 A(1) (d) (iii) depending on the proportion of animal raw material used as a percentage of finished product production capacity* following the proposed variation. We did not have all the information we needed to make this decision at this stage. Calculations will need to be provided with your application to demonstrate which listed activity the food and drink operations will fall under.

The percentage of animal raw material as a percentage weight of the finished product production capacity should be calculated for each line and then added together to work out the total, as summarised below:

$$A = \frac{Line\ 1\ capacity}{Total\ capacity} \times A1 + \frac{Line\ 2\ capacity}{Total\ capacity} \times A2 \ldots + \frac{Line\ n\ capacity}{Total\ capacity} \times An$$

where A1 = % animal raw material for Line 1 etc.

$A = A_1 + A_2 + A_3 + A_4 + A_5$

Once A has been calculated it will be possible to check to see if the changes following this variation will result in the installation falling under Section 6.8 A(1)(d)(iii) or whether it will remain under Section 6.8A(1)(ii) with products containing animal and vegetable raw materials captured as a Directly Associated Activity.

* Maximum level of production that could be achieved at the installation in tonnes per day.

Activity listed in Schedule 1 of the EP Regulations	**Description of specified activity and WFD Annex I and II operations**
Section 6.8 A(1)(d)(ii) OR Section 6.8 A(1)(d)(iii)	Treating and processing raw materials intended for the production of food products from vegetable raw materials at plant with a finished product production capacity of more than 300 tonnes per day (average value on a quarterly basis) OR Treating and processing animal and vegetable raw materials with a finished product production capacity greater than separate products, with a finished product production capacity in tonnes per day greater than – (aa) 75 if A is equal to 10 or more, or (bb) 300 – (22.5 x A) in any other case, Where 'A' is the portion of animal material in percent of weight of the finished product production capacity.
Section 5.3 A(1)(c)(i)	Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by biological treatment, not being treatment specified in any paragraph other than paragraph D8 of Annex IIA to Council Directive 75/442/EEC, which results in final compounds or mixtures which are discarded by means of any of the operations numbered D1 to D12 in that Annex (D8)

Forms required for submission

Provide fully completed versions of the following forms:

- Part A - https://www.gov.uk/government/publications/application-for-an-environmental-permitpart-a-about-you
- Part C2 - https://www.gov.uk/government/publications/application-for-an-environmental-permitpart-c2-varying-a-bespoke-permit
- Part C3 - https://www.gov.uk/government/publications/application-for-an-environmental-permitpart-c3-varying-a-bespoke-installation-permit
- Part F - https://www.gov.uk/government/publications/application-for-an-environmental-permit-partf1-opra-charges-declarations

If sections are not applicable to your permit please indicate this rather than leaving a section blank. Provide all supporting information requested in these forms.

Permit Application

You should provide the following documents for your bespoke permit application, comments have been included with regards to the scope and content of each of these documents as requested:

- **Non-Technical Summary**: You need to send us a simple explanation of what changes are being made to the application. This should include a summary of your operations, a summary of the key technical standards and control measures arising from your risk assessment. It should be possible for anyone to read this document and understand what is proposed in your application.

- **Technical Description**: You will need to provide a technical description of the changes you propose to make, detailing any changes to plant, equipment and infrastructure, including design capacities.

This should also include details of your operating techniques and the infrastructure you are using to minimise the risk of pollution, including any details of secondary containment (e.g. bunds) used and how this meets any relevant standards. This is likely to be particularly relevant for the new raw materials storage area and alterations to the AD facility. Further guidance on this can be found at https://www.gov.uk/guidance/pollution-prevention-for-businesses#storing-materialsproducts-and-waste

- **Process Flow Diagram**: This should show key stages of the production process and how they interlink with each other. This is to allow us to understand how the changes proposed within this variation link in with the existing process.

- **BAT Assessment:** You must demonstrate how you will meet any relevant Best Available Techniques. https://www.gov.uk/guidance/best-available-techniques-environmental-permits

-The Food and Drink BREF can be found through the following link. The adopted Food and Drink BREF document was adopted in August 2006. The document is currently being updated and is in draft form. The final draft (October 2018) is available. Although these don't take effect until publication they are the best reference point for BAT for installations that are replacing existing plant. Therefore, demonstrate how the pea processing plant, Canned Ready Meals (CRM) Line and new raw materials storage have had regard to this guidance, any deviation should be fully justified.
https://eippcb.jrc.ec.europa.eu/reference/fdm.html

-For the Anaerobic Digestion Plant – You should demonstrate compliance with the requirements of How to comply with your AD a copy of which is included with this response.

You will also need to consider
In addition, as this is new plant you will also need to comply with the requirements of the Waste Treatment BAT Conclusions document as published August 2018. This can be found through the following link: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.208.01.0038.01.ENG&toc=OJ:L:2018:208:TOC

Sector guidance note 5.06: recovery and disposal of hazardous and non-hazardous waste may also be useful when producing your submission.
https://www.gov.uk/government/publications/sector-guidance-note-s506-recovery-and-disposalof-hazardous-and-non-hazardous-waste

- A **summary of your Environment Management System:** Provide an updated summary of the EMS you have in place. The summary should cover all the points in 'Develop a management

system: environmental permits' at https://www.gov.uk/guidance/develop-a-management-system-environmental-permits

- **Environmental Risk Assessment**: You should describe the environmental risk posed by your proposals. This must take the form of an environmental risk assessment which should follow the methodology set out in 'Risk assessments for your environmental permit' at https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit.

If your environmental risk assessment indicates that any of the issues lead to an increase in risk then you may be required to submit management plans to address the risks (e.g. Odour, Noise Dust Management Plans) as discussed. Where management plans are already in place these should be revised and updated to reflect the changes proposed in this variation.

- **Odour Management Plan (OMP)**: An odour management plan is already in place for this installation, which has not yet been approved. The OMP has already been reviewed by the Environment Agency and comments were sent to the operator in an email dated 13/09/19. These comments should be addressed in a revised OMP. In addition, the comments outlined below which relate to the changes proposed through this variation should be addressed. The points were discussed in the telecon that was held on 18/10/19.

- Your OMP should be accompanied by risk assessment to address the odour potential of all changes proposed in this variation. Where there is the potential for incremental odour

then suitable control measures should be proposed. These proposals should consider BAT for the sector and be fully justified.

- Additional points were raised in the telecon regarding structure of the OMP which is outlined below:
  1. Structure of the OMP should follow our H4 guidance – Odour Management. https://www.gov.uk/government/publications/environmental-permitting-h4-odourmanagement
  2. Identify and breakdown all the odour sources.
  3. Identify the control measures for each odour source in relation to the risk
  4. Clear monitoring plan to ensure all sources are not resulting in odour with identified triggers to indicate when action is needed for each odour source. Optimal range of parameters that are monitored should be defined and actions taken when they are outside of this range. This should include process monitoring as well as emissions monitoring where appropriate.
  5. Contingency plan for each odour source to bring the site back into compliance.
  6. The operational parameters of the abatement equipment should be defined. The optimal operational conditions should be defined and the steps that are taken when the conditions are not optimal.

Considerations with regards to changes proposed in this variation

- Waste storage area – The production capacity at the installation is increasing, as a result there is expected to be greater waste material. Demonstrate that there is adequate storage provision and that the procedures in place remain suitable.
- Hydrostatic Steriliser on Canned Ready meals line – It is understood that there will be one additional emission point included through the introduction of this new line. This will be the emissions from the hydrostatic steriliser (cooker). This should be risk assessed. It is understood that the cooking process involves cooking the food in sealed cans. The risk of odours from the emission point is thus minimised.
- Abatement System associated with the effluent treatment plant – It is understood that where odour complaints have arisen in the past they have been associated with the Effluent Treatment Plant (ETP). Considering that the AD plant is to be replaced and that there is an increase throughput (increase in production capacity resulting in additional effluent) to the ETP you should demonstrate that the abatement system will be able to effectively control odours. Based on discussions during the telecom, the loading on the system is expected to remain the same/reduce, this should be fully explained in your application. If there is any additional loading on the system a report prepared by a suitably qualified odour abatement specialist should be provided to demonstrate that it will remain effective.
- New raw materials storage area – Provide details of how materials are stored in order to minimise generation of odours. Include details of any further odour control measures that are in place.
- Changes to floc pit, New cleaning in place system, New source kitchen for the flex line – These were additional changes to the site that were not set out in the pre-application request. The odour potential should be considered and suitable control measures put in place as necessary. Odour Modelling
- We would not consider odour modelling necessary for this application. Odour modelling is most appropriate in assessing odour emissions from point sources such as stacks and in justifying abatement systems.

- **Noise and Vibration Management Plan and Noise Impact Assessment**: If a one is required as a result of your risk assessment, you should follow the H3 guidance on our website as well as the requirements for a noise impact assessment: https://www.gov.uk/guidance/noise-impactassessments-involving-calculations-or-modelling

☐ **Water Discharge Assessments**

The production capacity is increasing at the installation, accompanied by an increase in the size of installation through the addition of new processing lines and a new raw materials storage area. It is expected that the amount of water used on site will also increase and in turn the flow rate to the onsite Effluent Treatment Plant. The following two assessments are/may be required.

-If there are hazardous pollutants in the discharge then you will need to complete a H1 assessment to assess these. To assess the **risk of hazardous pollutants to surface water**, you need to follow this guidance: https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your- environmental-permit

-You will need to assess the **risk from sanitary pollutants.** In order to complete this assessment you will need to get data from the Environment Agency. This should be made through a request for information to the Environment Agency. The following methodology should be followed when undertaking the assessment: https://www.gov.uk/government/publications/h1annex-d2-assessment-of-sanitary-and-other-pollutants-in-surface-water-discharges

-If based on the outcome on the above two assessments you need to undertake detailed modelling of the risk to surface water you should follow this methodology https://www.gov.uk/government/publications/modelling-surface-water-pollution-risk-assessment

We will review your water discharge assessment during the determination of your variation application, as part of this review we will also look at the current discharge limits in the permit to determine whether they are still appropriate.

- **Site Condition Report** -You should send us an updated site condition report which covers the additional land that is to be included in your permit. This should be in line with our guidance H5 Site condition report – guidance and templates which includes a template you can use: https://www.gov.uk/government/publications/environmental-permitting-h5-site-condition-report

  This needs to include a conceptual site model and identify any relevant hazardous substances that are present on the land to be included in the permit. Quantitative baseline soil and groundwater monitoring data on the condition of the new areas of the site should be included or you should provide a justification on why this is not required. You should also consider if you need to undertake soil gas monitoring.

- **Installation Boundary Plan and Emissions Points Plan** - Send us a plan that identifies all of the land on which your activities take place. The site plan should provide a date and a reference and must be drawn accurately to a defined scale and should show the direction of north. The outline of the site must be clearly marked. It will be helpful if local features are shown on the plan to help us place the site in its local environment.

  It should include the new raw materials storage building and all operational land associated with it (e.g. land for vehicle movements, outbuildings, external storage).

  The current permit shows the emission points on the installation boundary plan in Schedule 7. You can include the emission points on the revised installation boundary plan or provide these in a separate emission points plan.

- **Site Layout Plan**: Provide a plan showing the location of all key buildings and infrastructure located on the site. The plan should be clearly labelled. You should also show emission points to air and water on the plan.

  This should show where the pea processing plant is now located, location of root crop replacement, root crop equipment, the CRM line and the materials storage area.

- **Site Drainage Plan**: Provide a plan showing drainage arrangements on site. It should show the piping network and where surface water and foul water discharge to.

  Include all additional pipe work associated with infrastructure being included as part of this variation.

Additional Requirements

- **Root Crop equipment, boiler and M&P Hydrostat:** Explain how these are/will be decommissioned and how the equipment will be disposed of.

- **New Emissions Points to Air and Water:** Summarise what is being released from each emission point. Explain why each emission can be considered acceptable.

Baseline fee

This application will require a 'substantial variation' to each activity. The fee will still remain the same should it be necessary to change the food and drink listed activity. The charge for this is outlined below:

Activity ref.	**Charging table ref.**	**Activity**	**Fee**
S6.8 Part A(1) (d) (ii)	1.7.1	Section 6.8 – food and drink production.	£12,585
S5.3 A(1)(c)(i)	1.16.2.1	Section 5.4 (a)(i) and (b)(i) – non-hazardous waste installation – biological treatment	£12,586
		Sub-total	£25,171
		Baseline Fee - cost of assessing plans needs to be included as outlined below	**£20,976 ***

* The baseline fee for a variation should not exceed the cost of a new bespoke application for the activities listed in the permit, which would be £20,976. As the variation fee would cost more than a bespoke application then the baseline fee has been capped at the cost of a bespoke application.

Assessing plans fee

If we need to carry out additional assessments for a particular activity at a particular location, we will charge extra for this work. The odour management plan will require updating and as a result an assessment of this will be required as part of this variation. The plans and assessments are listed in table 1.19 in the tables of charges. The relevant charges for this application are:

- odour management plan - a fixed charge of £1,246
- noise and vibration management plan - a fixed charge of £1,246 (if required following the outcome of your risk assessment)

See the guide Control and monitor emissions for your environmental permit for more information about:

- odour management plans
- noise and vibration management plans (if required following the outcome of your risk assessment)

The advice given is based on the information you have provided, and does not constitute a formal response or decision of the Environment Agency with regard to future permit applications. Any views or opinions expressed are without prejudice to the Environment Agency's formal consideration of any application. Please note that any application is subject to a full technical check during duly making and determination, and additional information may be required based on your detailed submission and site specific requirements.

When you're ready to submit your application please quote the above reference number.

Your completed application can be sent via email to psc@environment-agency.gov.uk

Or by post to
Permitting Support Centre
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

A complete application must contain the following information;

Declaration	Please ensure the declaration section is completed by each relevant person. For a limited company, this must be a director/company secretary as listed on Companies House.
Site Plan	Site plan must be clearly marked with the full site boundary
Payment	Please note your application will not be processed until we receive the full payment.

We look forward to working with you on this project.

If you have any questions please find my contact details below.

Yours sincerely,

James Lidgett
Senior Permitting Officer - Installations
National Permitting Service - Part of National Services E&B

Trentside, Scarrington Road, West Bridgford, Nottingham, NG2 5FA