

Duly Making Information Request

Application reference: EPR/NP3127SX/A001

Applicant: PATTEMORE'S TRANSPORT (CREWKERNE) LIMITED

Facility: Pattermores Dairy, Mosterton Road, Crewkerne, TA18 8NT

The following documents were referenced in the application but were not provided, these must be provided:

- PAT-OD-04 - Accident Management Plan
- PAT-OD-03 - Odour Management Plan
- Air Quality Assessment - the modelling files relating to the AQA should also be provided.

In reply:

The above the documents have been added to the SharePoint file [EPRNP3127SXP001 Pattermore's Transport \(Crewkerne\) Limited](#) within the folder named 'Duly Making Information Request'.

Please also see the following updated application documents also within the SharePoint file:

- Site Layout Plan
- Non-technical Summary
- Environmental Management System (updated to include a reference to the Waste Handling Procedure (PAT-SOP-17)).
- Permitted Activities Document (ETL886_Pattermores_PermittedActivities_V1.0_Jan 25)
- H1
- Combustion Plant List (ETL886_Pattermores_Combustion Plant_V1.0_Jan 25) with updated grid references

1. Form B2 - Q6 - Environmental Risk Assessment -

Provide further detail relating to the noise risk of the site. As the site is close to a sensitive receptor we need further information to confirm if a Noise Impact Assessment should be complete in support of the permit application not. We require further detail including:

- When is the site operational? i.e. 24/7 365 days a year or less, provide detail on operational hours.

[The Site is operational 24 hours per day, 365 days out of the year.](#)

- Does the site operate a night, if yes then provide detail on what activities are carried out at night?

[The dairy operates throughout the night, which would include all equipment. There are also deliveries and product dispatches through the night.](#)

- Will there be any new noise sources related to the new production lines being installed (goat and plant milk) which will increase the production capacity over the regulator threshold?

Pasteurisation and packaging of both goat and plant milk lines will be added. These activities will take place within the existing production space inside the Dairy Building itself along with existing milk processing and pasteurisation activities. There should be no increase in noise emissions or impact at receptor locations.

- Please provide monitoring data for the current discharge to surface water.

Please see the last 9 months of the Certified Laboratory, Eurofins monthly analysis reports included with SharePoint file (dated March 2024-November 2024). The analyses to date have not included Total Nitrogen or COD. A sample will be sent to Eurofins week commencing 13th January 2025 which will include both Total Nitrogen and COD for reference and we will forward these results as soon as they are available.

- Will the composition of the effluent change due to the new process being installed on the site e.g. the goat and plant line?

The composition of the effluent will remain unchanged, given the effluent from both additional production processes will be similar in composition to existing effluent.

2. Form B3 - Q3a - Technical Standards and Infrastructure

- Provide further detailed on the containment on site i.e. any chemical storage, effluent treatment plant, see the following guidance on leaks from containers for more information [https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#leaks-from-containers:~:text=to%20do%20this\)-,Leaks%20from%20containers,-You%20must%20prevent](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit#leaks-from-containers:~:text=to%20do%20this)-,Leaks%20from%20containers,-You%20must%20prevent)

There is currently no conventional bunding in place surrounding the Chemical Storage Area and limited bunding serving the Effluent Treatment Plant (ETP) with the 6 No. Back Tanks and 2 No Stainless Steel tanks the only tanks housed within a bund. Bunding arrangements for the ETP tanks that are proposed to be relocated to the east of the Site (Bio DAF, Screw Press and Sludge Tank) are to be designed and implemented.

Current drainage and containment arrangements and site procedures ensure that potential spillages from the ETP or Chemical Storage Area can be contained on Site. The whole Site benefits from impermeable surfacing and drainage containment in the case of a spillage. The Site is not within either a Groundwater Source Protection Zone or a Drinking Water Safeguard Zones (Groundwater) (England).

There is a daily check for spillages and on the integrity of all chemical, fuel and oil storage, ETP tanks and any associated bunding. Drainage sumps are captured within the maintenance and service planner and are checked periodically in accordance with this.

The maximum quantities of all raw materials and storage locations are detailed within the application document Raw Material Inventory (Document reference: ETL886_Pattemores_RawMaterials_V1.0_Nov 24). The storage locations of Raw Materials can be seen on the Raw Materials Plan (Document reference: ETL886_Raw Material Locations_V1.0_Nov 24).

There is one section of underground pipework conveying Kerosine from the bunded Kerosine tank (located by the re-fuelling station within the Top Yard) to Boiler 3. Any leaks would be identified through excessive Kerosine consumption by Boiler 3. All other underground pipework and associated sumps are limited to drainage conveying pipework and intermediary sumps (including the emergency pit 10m³ at the south of the site) which are identified on the Site's Drainage Plan.

Chemical Storage Area

Chemicals are stored within a designated Chemical Storage Area, both within barrels housed on bunded pallets and within intermediate bulk container (IBCs). The Chemical Storage Area is located on concrete impermeable surfacing; adjacent to the Vehicle Cleaning Station and positioned within the Top Yard Area, away from the watercourse located south of the Site. The Vehicle Cleaning Station is served by CIP set 3, with all drainage directed to the ETP. Any chemical spillages would be captured within the CIP 3 drainage system and would enter the ETP.

The Top Yard Area has a separate clean water drainage system with rainwater falling here entering a concrete settlement (60m³) tank prior to discharge to the watercourse via Emission Point W2 (emission point A2 under the current discharge consent). Following any spillages on the Top Yard, the valve on the concrete settlement tank would be manually closed to prevent any spillages entering the watercourse.

Effluent Treatment Plant

The 6 No. Back Tanks and 2 No Stainless Steel tanks are housed within a bund comprised of breeze block walls measuring 32m (L) x 6m (W) x 0.5m (H) with a capacity of 96m³. Although there is currently no conventional bunding in place for the remaining ETP tanks, any spillages would be captured within the Top Yard concrete settlement (60m³) tank and contained here before being routed back for treatment within the ETP.

High level sensors are in place within the following ETP tanks; Balance Tank, MBR, Activated Sludge and Aerobic Tank and 2 No. Stainless Steel Tank). The ETP process is typically operated in automatic mode; any high level triggered will automatically disable the DAF Plant, stopping the process. The process can also be transferred manually if required.

Storage of Fuel and Oil

There are three main bunded areas for the storage of Kerosene, Diesel, AdBlue, Oil and Waste Oil. These areas are located at the west of the top yard adjacent to the re-fuelling station,

immediately to the north of the Maintenance Workshop and a third new bunded store has recently been constructed to the east of the new Workshop.

The Fuel Tanks within the historic fuel bunds benefit from high- and low-level sensors which trigger a flashing beacon and siren when activated, alerting staff to a potential issue. The bunds are constructed of breeze block walls and concrete base and each are appropriately sized to contain either 25% of the combined tank volumes or 110% of the largest tank volume, whichever is greater in each case.

There is an Oil Separator and Soakaway within the Top Yard which serves the fuel tank bund adjacent to the re-fuelling station. Rainwater collecting here is positively released to the interceptor following a visual check to confirm the absence of any spillages.

The newly constructed additional bunded store has a capacity of 11,000L (11m³) and has been constructed adjacent to the new workshop for the storage of Kerosene Heating Oil, Engine Oil and Waste Oil. The bund houses 3 No. new tanks, each one is double skinned with a 2,500L capacity and all tanks have electronic level gauges.

The bund has an impermeable coating which is oil resistant. A pump is in place to remove any rainwater which has a self-closing valve and must be manually operated. All associated pipework feeding into these tanks is above ground and of stainless steel construction. The delivery and collection drivers are required to report to Workshop reception before loading/unloading can commence as this is controlled via a sluice valve. The area on which delivery and collection vehicles are parked is kerbed and can contain a volume of 7,000L. This provides emergency containment in case of a split hose or spillage from the tanker.

- Provide further detail on the waste handling procedures on site including storage and segregation.

There is a Waste Handling Procedure (PAT-SOP-17) which has been included with this submission. Typical waste types generated, and storage arrangements are outlined below:

- Recyclables are stored within 1,100L roll top Wheelie Bins located across the Site. Waste within the Wheelie bins is then removed and further sorted and segregated by Veolia.
- Non-recyclable general rubbish (non-hazardous industrial waste) is stored within a 35 yard roll-on roll-off (RORO) container and this is then collected ad hoc and taken to an energy from waste facility by Veolia.
- Waste batteries from the Site's Transport Department are stored and collected by Newbury metals who also collect any scrap metal such as old pipework.
- Waste tyre storage is segregated and tyres are collected by Tructyre.
- Waste oil is held in a designated double skinned tank adjacent to the workshop with a 2,500L capacity. The tank has an electronic level gauge and is located within a bund which has an oil-resistant impermeable coating. Waste oil is collected by Slicker Recycling.

- Provide further detail on the reedbed which is in place.

The 'reedbed' although termed as such is in fact not an actively maintained reed bed treatment system, the reeds are naturally occurring within the pond. Whilst it may provide some natural water filtration, it was not designed to operate as a reedbed wastewater treatment system.

3. Form B3 - Q3c - Raw Materials and Water Usage

- Provide further details on water usage at the site, is there any data around water use and any procedures in place to ensure water usage is as efficiency as possible?

There are three available sources for clean water:

- Mains water which is used in the process.
- Borehole water which can be abstracted under a permit (50- 55 m³ per day maximum).
- Recovered water (condensate) from the Evaporators.

Pattemore's track the usage of cooling tower and borehole water and also record quantities of mains water used. This data is recorded daily onto a spreadsheet – a sample of this data is included in this submission (Document references: Pattemore's Water Usage Records & Pattemore's Cooling Tower Water Records). Please note the mains water usage provided is the daily average for each month.

Pattemore's are improving their submetering with flow meters installed on Process Line Nos. 1 and 2 and also on Evaporator 1. Water usage is recorded weekly. Pattemore's are working towards metering additional Process Lines in the future.

Pattemore's aim to ensure water is used as efficiently as possible, reusing water from the dairy processing where possible. Condensate water produced from the 2 No. Evaporators on site is used within the process where possible. The condensate from Evaporator 1 is reused as header water for the boiler. Condensate from Evaporator 2 is reused to wash Evaporator 2 and following treatment is then used around site for general cleaning through power washers and mixing with polymers for the Dissolved Air Flotation (DAF) Plant.

4. It is noted in the application that the from our brief call you clarified that there are no changes proposed to the ETP or the existing discharge. However, relocation and increased storage and treatment capacity is discussed in the application non tech summary. Please remove reference to the changes to the ETP from the application in to avoid confusion. If relocation or changes are proposed in the application, we will require a full risk assessment on the discharge to surface water.

There are no proposed changes to the existing discharge at this time. The existing discharge (A1 under the current discharge consent, proposed to be renamed emission point W1 under the consolidated Installation permit) comprises a number of flows including; trade effluent

comprising dairy effluent (treated within the Effluent Treatment Plant), dairy evaporator condensate water, boiler blowdown water, and the lower yard site drainage.

With regard to the proposed changes to the Effluent Treatment Plant (ETP), the proposed effluent storage will allow additional buffer storage for wastewater prior to treatment within the ETP. This will offer significant operational and environmental benefits, providing contingency storage should there be issues or breakdowns within the ETP. The existing Balance Tank is proposed to be repurposed as an Activated Sludge Tank which will improve the ETP treatment efficiency.

The treatment capacity of the ETP is estimated to be approximately 182,500 m³/ year (500m³/day). Anticipated waste inputs into the ETP, including waste arising from the new production lines is expected to be approximately 95,000m³/year (260m³/day). This remains within the designed treatment capacity.

Both the volume and flow rate of effluent discharged under the existing discharge consent will remain within the current consented limits. The location of the emission point through which this is discharged (A1 under the current discharge consent, proposed to be renamed emission point W1 under the consolidated Installation permit) will also remain the same.

As discussed, Pattermore's will confirm exactly which elements of the ETP are to be relocated prior to the permit being determined if this information is available in time. Construction details of any new tanks (buffer storage) will ideally be provided prior to determination, although we would request that there may be some provision for a pre-operational condition in this regard. It is understood that should we not be able to provide sufficient information, any changes to the ETP would need to be managed via an additional permit variation.

5. Separate to this application you have also noted that you have a new effluent discharge which meets the GBR - although this is not covered under the installations permit I have noted that the [General binding rules: small sewage discharge to the ground - GOV.UK](#) states that the maximum discharge volume is 2m³/day, in the application it is stated a discharge volume of 4.25m³/day. We would advise reviewing the guidance and regulations to determine if a separate permit should be applied for.

There has been a miscommunication here. The new Klargester will discharge to surface water not to ground. The GBR in this case allows a maximum of 5 cubic metres (5,000 litres) a day to surface water (<https://www.gov.uk/guidance/general-binding-rules-small-sewage-discharge-to-a-surface-water>) and the discharge volume of 4.25m³/day is below this threshold.