

Non-Technical Summary

AB World Foods Leigh, part of the ABF grocery group, produces hot filled and pasteurised sauces, pastes, pickles and chutneys that are ambient and stable and pappadums that are fried in oil. Various packaging mediums are used including: - glass jars, plastic jars, pots and thermoformed plastic cartons. Finished goods are transported from site and distributed by a third-party logistics company.

Further to completion of an Environment Agency sector focussed questionnaire, a visit by Alex Wilson of the Environment Agency to the site and further investigation by EHS Projects of the site's potential regulatory obligation, AB World Foods (the operator) considers the production of pastes and sauces at the site is obligated under the Environmental Permitting (England and Wales) Regulations (EPR) 2016, as amended, in relation to the following activities:

Section 6.8 A(1) (d)(iii)

Treatment and processing of animal and vegetable raw materials (other than milk only), both in combined and separate products, with a finished product production capacity in tonnes per day greater than—

(aa)75 if A is equal to 10 or more.

There are a number of directly associated activities on the site which support the obligated activity, including:

- Storage of raw materials in bulk tanks (oils and acetic acid);
- IBC and drum storage;
- 2 x steam raising boilers;
- 2 x thermal oil boilers;
- 3 x cooling towers;
- Odour abatement plant
- Storage of waste prior to disposal off-site;
- Treatment of effluent prior to discharge.

The effluent treatment is considered a permissible activity under the following schedule reference:

Section 5.4 A (1) (a) (ii)

Disposal, recovery or a mix of disposal and recovery of non-hazardous waste

(a) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day (or 100 tonnes per day if the only waste treatment is anaerobic digestion) involving one or more of the following activities and excluding activities covered by Council directive 91/271/EEC concerning urban waste water treatment -

(ii) physico-chemical treatment;

The operator is therefore now making an application for an Environmental Permit to cover its current operations.

Emissions to air from the site are from the two steam raising boilers, two thermal oil boilers serving the fryers, and the odour abatement plant which treats exhaust air from the fryers. These have been assessed and found to have an insignificant impact on surrounding ecological and human receptors.

Emissions from the effluent plant are transferred to Leigh Wastewater Treatment Works for further treatment prior to release back into the environment. If there is a known issue with effluent being out of consent, it can be held back in the effluent reception pit or balancing tank until compliance can be achieved. Surface water run-off from the site is routed via the surface water drainage system to Westleigh Brook. The site has a programme of planned improvements to the drainage system in place, to ensure that the final outfalls to surface water drains can be blocked off to prevent a release off-site in the event of a major spillage.

The operator has measures in place to protect drainage systems from spills of raw materials or wastes, including secondary containment of bulk tanks, level sensors for tanks, spill procedures and spill kits, and the ability to contain spills within the effluent reception pit. All potential accident scenarios, mitigation measures and response actions are included in the Accident Management Plan within this application. A full tank inventory and containment measures are provided within the application.

There is considered to be no significant risk of fugitive emissions to air, odour or noise and vibration from the site. An Odour Management Plan has been submitted as part of this application.

The process is operated in accordance with the site Hazard Analysis and Critical Control Point (HACCP) plan, with operating procedures and risk assessments in place for all manufacturing operations. The process is operated in such a way as to maximise yield and minimise wastage. The operator has a rolling Continuous Improvement (CI) plan in place with opportunities regularly identified and tracked on the CI tracker.

The operator is currently developing a Health, Safety and Environmental Management System which will incorporate all the requirements of the forthcoming Environmental Permit.

Raw materials are delivered in drums, IBC's, sacks, bags and smaller containers and stored internally within the warehouse. A full raw materials inventory is provided within the application.

Energy use, water use, raw materials use and waste arisings are all measured and monitored. The operator is part of the underlying Climate Change Agreement for the food and drink sector, Agreement Identifier: FDF1/T00447v2, Facility Identifier FDF1/F00499.

Sensitive ecological and human receptors around the site have been identified and a risk assessment carried out on the potential for the site to impact upon these receptors. Air emissions modelling was carried out to assess the impact of emissions to air from the boilers and odour abatement plant. This

concluded that emissions are within guideline levels and will not have a significant impact on human or ecological receptors.

The risk assessment concludes that while there is a risk of pollution of the surface water drainage system, containment and mitigation measures in place and planned improvements are sufficient to manage the risk to an acceptable level.