Site Protection and Monitoring Programme

l'Anson Bros Ltd

Dalton Mill

Version 1

Contents

Executive Summary

This document represents the Site Protection and Monitoring Programme (SPMP) for I'Anson Bros Ltd, Dalton submitted to the Environment Agency (EA) in pursuance of Condition 4.6 of Permit No (TBC) (the "Permit") authorizing "the treating and processing of 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)".

This document is Version 1

The testing, inspection and maintenance programme for pollution prevention infrastructure at the site (the Infrastructure Monitoring Programme) has been designed as detailed in Schedule 3. The results of the routine monitoring will be collated into a Monitoring Report and sent to the EA on the 31st of January each year. The Monitoring Report will also contain recommendations for changes to the SPMP (if any) to be formally agreed, in writing, by the EA.

An intrusive investigation for benchmarking purposes is not required in this case as no sources were identified in the Site Condition Report (at the time of PPC application submission) as having a 'reasonable likelihood of pollution'. The measures in place will ensure that no pollution occurs. For the same reason an ongoing Environmental Monitoring Programme is not proposed.

The potential sources of contamination identified in the Site Condition Report included the vegetable oil and molasses delivery points; the minerals and salt delivery points and the lubricating oils storage area which have containment measures installed thus removing the need for collecting reference data in these locations. The site drainage system was not identified as an area requiring the collection of reference because the site run-off only consists of surface water drainage. Foul water associated with the site welfare facilities and a small volume of boiler blow down water is discharged to the public sewer.

1. INTRODUCTION

1.1 Introduction

I'Anson Bros Ltd is required to maintain a Site Protection and Monitoring Programme (SPMP) for their installation Dalton Mill in Dalton. This SPMP has been produced by I'Anson Bros Ltd & AV Consultants, in accordance with the conditions of the Permit to be issued under Regulation 10 of the Pollution Prevention and Control Regulations.

This document is intended to be read in conjunction with the following supporting documents:

- Site Condition Report, dated 2022
- Permit when issued

1.2 Installation Location

The installation is located at:

Dalton Mill
Waterloo House
Wellington Way
Dalton Airfield Industrial Estate
Dalton
Thirsk
North Yorkshire
YO7 3SS

The centre of the site is at Grid Reference 441810 476290.

The site covers an area of approximately 4.5 hectares and can be seen in the site location plan Figure 1.3a and site plans 1.3b – d.

1.3 Details of Installation

The site is located within an area of approximately 4.5 hectares, with the site boundary comprising secure fencing and a lockable gate.

The Dalton installation manufactures compound and dry blend animal feeds i.e. feeds which are suitable for consumption by an animal without further processing.

The compound and dry blend feeds are based upon core formulations of cereals (such as wheat and barley), soya, rape seed and sugar beet, plus specific additives, such as mineral supplements. The processing is undertaken to a specific formulation on a batch basis, with the key stages being weighing, grinding, mixing, conditioning, pressing, cooling and coating.

Depending upon the specific formulation, the required cereals are weighed out prior to grinding to a uniform grist size. The ground materials are then transferred to the mixing stage of the process, where they are mixed with pre weighed supplements and feed additives. Following this, the mix is conditioned through the addition of steam to eliminate any bacteria present and to improve the workability of the mix.

After conditioning the hot mix is conveyed to press lines, where it is extruded through dies to produce pellets. The hot pellets are then passed through a counter flow air cooler to reduce their temperature, causing them to harden and become durable. All of the pellets are subsequently coated in fat to produce the finished product. Pellet, cob and nut products as well as some meal products are used as feed for ruminants. The finished product is then stored in silos prior to being automatically loaded to bulk vehicles for delivery or collection on an as required basis.

External areas comprise car parking areas, and fully metalled roadways, rough ground and trees.

2. OBJECTIVES

2.1 Report Objectives

The objectives of this report are:

2.1.1 To audit the monitoring programme for the installation to:

- Review and if necessary amend the inspection, testing and maintenance programme for pollution prevention of the infrastructure at the installation to ensure their continued integrity.

2.1.2 There is no requirement for a site investigation to collect reference data as there were no sources identified as having a 'reasonable likelihood of pollution'.

The potential sources of contamination identified in the Site Condition Report included the following:

- **Vegetable oil and molasses delivery points.** The fill points outside of the bunded areas are protected by catch trays under each fill point which would contain any spills and leaks. There are procedures in place for the regular inspection and emptying of these catch trays. Pneumatic control valves are fitted on each fill line inside the bund. Filling lines are also closed on completion of the delivery and the fill lines have sealed screw caps fitted to the lines when not in use. Kerbing provided around the liquid intake area contains any spillages and spill kits are available in the case of an emergency.
- **Minerals and salt delivery points.** Pneumatic control valves are fitted on each fill line. Any material spilled during filling would be cleaned up immediately as outlined in the procedure.
- **Storage of lubricating oils (205 & 25 litre drums).** The drums have secondary containment consisting of bunded trays that are designed to hold the capacity of the liquid stored. There is no requirement to collect reference data in this location.
- **Site drainage system.** The site drainage system was not identified as an area requiring the collection of reference data because the site run-off only consists of surface water drainage & a small quantity of blowdown water. Foul water only consists of discharge associated with the site welfare facilities and wash water associated with vehicle wash. The foul water discharge is to the water course via a private Klargester sewer. Therefore, it is very unlikely that I'Anson Bros Ltd installation could cause ground contamination thus eliminating the requirement for the collection of reference data.

3. MONITORING PROGRAMME

3.1 Objectives of the Monitoring Programme

3.1.1 Objectives of Infrastructure Monitoring Programme

To test the integrity of the pollution prevention infrastructure currently in place and evaluate the monitoring, inspection and testing programme in place to maintain the infrastructure as detailed in sections 2.2.2 (emissions to water and sewer) and 2.2.5 (Fugitive emissions to surface water and groundwater) of the IPPC application.

3.1.2 Infrastructure Monitoring Programme

In general, infrastructure will be monitored as part of the maintenance systems on site.

Maintenance of plant and equipment as far as is practicable is essential to minimise environmental impact, ensure safe working of plant and equipment and sustain the production of product to the required quality.

The maintenance activity is split between planned work and emergent work and coordinated by the Production Manager and Operations Manager using both an internal site services team and external resource for specialist testing / inspections.

Routine work includes examination and testing due to appropriate statutory requirements, regulations, manufacturers and suppliers' recommendations and as part of the company planned maintenance system. Frequency of testing depends upon these criteria.

Planned (preventative) maintenance is undertaken to ensure the integrity and function of critical equipment for production as well as equipment essential for environmental health and safety. This is to maintain identified equipment in a safe, efficient and reliable manner.

The Operations Manager and the Production Manager co-ordinate staff and relevant sub contractors. Competency of external specialists and contractors is reviewed by the Operations Team.

Planned maintenance tasks carried out by maintenance personnel may be subject to a permit to work. Sub contractors are required to submit a work method statement and in some cases are issued with a permit to work. Any records of equipment inspected and tested are kept and maintained in the Engineering Department.

Emergency work is classed as breakdown work and is reviewed on an immediate and daily basis. Upon discovery of a fault with plant or equipment, parties with an interest, e.g., Production Manager, will liaise with the Operations Manager (or Engineering Department) to discuss details of the work needed.

Any waste generated by maintenance activities is disposed of appropriately. Hazardous Waste will be contained and labeled and disposed of via an approved contractor.

The infrastructure monitoring programme is summarized in OP07 & SP08 from the Environmental Management System and comprises the following inspection programmes:

Surfacing

All of the operational areas are covered with concrete hard standing. However, outside the installation operations area there is a small, vegetated area, these are subject to a care and maintenance package. Beyond the installation boundary there are also a number of vegetated areas.

To ensure the integrity of impermeable hardstanding a programme of visual inspections will be conducted:

All areas – once every year

In addition, informal inspection is almost continuous by the mill staff. The mill staff are all fully briefed in the various aspects of the EMS and in the event of a fault of any description to the integrity of the hard standing, the details will be reported to the appropriate person. The fault will then be addressed whether an incident under the accident management plan or routine maintenance.

Subsurface Structures

There are two underground storage tanks;
A large storm water attenuation tank which is purpose designed to regulate the flow of storm water into Cod Beck in times of unusually high rain fall.
A waste waster accumulation tank associated with the vehicle wash, this is discharged in a controlled manner into the public sewage system according to the discharge consent.

The only other subsurface structures on site are the effluent drains. The drainage system is designed to discharge condensate from trace heating which cannot be returned to the boiler hot well tank. The receiving gully in the liquids pump house is inspected on a daily basis to ensure there is no contamination, the manhole and discharge chamber comprising the drainage system are inspected on a monthly basis to ensure there is no solids build up. The pump area containment has a sump where any leaks or spillage accumulates this also facilitates contaminant removal. This sump and the pump containment is inspected on a daily basis to ensure potential leaks are detected at the earliest opportunity.

Secondary Containment

All of the permanent above ground storage tanks have secondary containment. There is a procedure in place for the inspection of main containment infrastructure which is linked to the preventative maintenance programme to maintain integrity.

Visual inspection (for leaks and cracks) – weekly

Tanks and Associated Pipe Work

There is a procedure in place for the inspection of main containment infrastructure which is linked to the preventative maintenance programme to maintain integrity. This covers the inspection of tanks and associated pipe work.

Visual inspection - weekly

3.2.1 Personnel responsibilities

The following personnel are responsible for undertaking the infrastructure monitoring programme:

Inspection	Type	Frequency	Responsibility
AdBlue tank & pump house sump and containment system	Visual	Daily	Production supervisor
Liquid raw material tanks & bunds, blow down system, compressor auto drains & waste storage areas	Visual	Weekly	Production Supervisor
Storage tanks, bunds, pipework	Visual	Monthly	Production Manager
Outlet to water course W1	Visual	Monthly	Production Manager
Infrastructure and site oversite condition	Visual	Annually	Production Manager / Operations Manager

Personnel responsible for the inspection, testing and maintenance of pollution prevention infrastructure are trained to an appropriate level to ensure compliance with the Infrastructure Monitoring Programme. The site operates an Environmental Management System (EMS) and all such activities are covered by 'Work Instructions'. These are recorded in Section 3 of the EMS.

3.3 Assessment and Reporting Procedures

The assessment and reporting procedure will be carried out within the remit of the site management systems.

3.3.1 Assessment Procedure

For infrastructure an assessment of the potential for containment infrastructure to fail will be undertaken. The assessment will be carried out by responsible persons with suitable technical and operational experience.

A summary of infrastructure monitoring data indicating any noted dysfunction of pollution control measures and corrective actions will be forwarded to the EA.

3.3.2 Reporting Procedure

Infrastructure monitoring will be recorded as will summaries of any pollution incidents and failure of containment measures resulting in emissions.

Summaries of the monitoring data and results of the data assessment will be submitted to the EA on 31st January each year following the initiation of the SPMP together with recommendations for any amendments to the SPMP.

3.3.3 Recording and Data Management

All assessment sheets used for the infrastructure assessment are stored in a secure location.

4. REFERENCES

4.1 References

Site Report

Permit

Revisions

The SPMP was modified on the following dates as follows; (first issue 2023)

5.0 Environmental setting

This section provides an assessment of the site sensitivity in terms of the underlying geology, the groundwater resources and the hydrological context of the site.

5.1 Topography

The site lies at an elevation of approximately 20m above Ordnance Datum (aOD) and is generally flat.

5.2.1 Geology

The site is shown to be underlain by solid geology of Mercia Mudstone Group Formation consisting of reddish-brown mudstone with subordinate siltstone and sandstone. BGS mapping indicates that there are three possible types of superficial deposits located beneath the site. The majority of the site is expected to consist of Breighton Sand Formation which is made up of silty sand and gravel. However, the northeast of the site is mapped as the Alne Glaciolacustrine Formation consisting of clay and silt. An area of alluvium associated with Cod Beck is mapped immediately north of the site.

5.2.2 Hydrogeology

The solid geology beneath the site is classified as a Secondary Aquifer The overlying drift is classified as an Unproductive Strata.

5.2.3 Ecology

There are no sensitive habitats designated by English Nature, such as Sites of Special Scientific Interest, Special Protection areas or Special Areas of Conservation within 1km of the site.

5.2.4 Surface water

The nearest surface water feature is Cod Beck, located 142m north-west of the site. The Envirocheck Report states there are six Licensed Discharge Consents entries within 500m of the site. The nearest of these is located 17m north of the site with Trade Discharge – Process Water being discharged into a freshwater stream, which is an unnamed tributary of Cod Beck.

5.2.5 Ecological Receptors & environmental receptors & pathways

Geology, Hydrogeology & Surface water	
Aspect	Details
Geology	The site is shown to be underlain by solid geology of Mercia Mudstone Group Formation consisting of reddish-brown mudstone with subordinate siltstone and sandstone. The majority of the site is expected to consist of Breighton Sand Formation which is made up of silty sand and gravel. The northeast of the site is mapped as the Alne Glaciolacustrine Formation consisting of clay and silt. An area of alluvium associated with Cod Beck is mapped immediately north of the site.
Hydrogeology	The solid geology beneath the site is classified as a Secondary Aquifer The overlying drift is classified as an Unproductive Strata
Surface Water Features	The nearest surface water feature is Cod Beck, located 142m north-west of the site.
Ecological Receptors	None identified within 1km
Ecological Receptors & Environmental receptors & pathways	
Summary of Receptors (pathways)	Land (spills and leaks to the ground) Minor aquifer (leaching from soils and percolation through permeable ground) Cod Beck (site drainage, shallow groundwater flow)
Activities identified with a reasonable possibility of future pollution occurring	Delivery & bulk storage of molasses Delivery and bulk storage of vegetable fat Storage of lubricating, hydraulic oil and waste oil
Land pollution history and main pollution incidents	Treating and processing of vegetable raw materials for animal food products with associated bulk oil storage No specific historical pollution incidents recorded relating to site
Contamination identified in previous investigations	No previous investigations undertaken.

5.3 Review of Activities with potential for release to ground

This section provides a review of activities operated under the permit with potential for release to ground.

5.6 Vulnerability of site to contamination

The sensitivity of receptors in the vicinity of the site to contamination is summarised in the Table below;

Sensitivity of Receptors in the Vicinity of the Site.

Receptor Type	Receptor(s)	Sensitivity	Reasoning
Ground water	Minor Aquifer	Low	Solid geology of Mercia Mudstone Group Formation consisting of reddish-brown mudstone with subordinate siltstone and sandstone. The majority of the site is expected to consist of Breighton Sand Formation which is made up of silty sand and gravel. The northeast of the site is mapped as the Alne Glaciolacustrine Formation consisting of clay and silt. An area of alluvium associated with Cod Beck is mapped immediately north of the site.
Surface water	Cod Beck	Low	As Cod Beck flows towards the river Swale through agricultural land the greatest concern is nitrates run off. The minor controlled emission from the mill is well distributed as the particulate modelling confirms. The actual pollutant is organic residue from crops and as such does not pose an environmental hazard.
Receptor Type	**Receptor(s)**	**Sensitivity**	**Reasoning**
Ecological		Very low	No recorded SSSIs
Farming and forestry	Sensitive farming catchment & woodland.	Very low	The operations at the installation will have no impact on these areas indeed the installation supports agriculture. The particulate emissions are organic residue from crops and as such do not pose a hazard.

6.0 Assessment of land pollution potential

6.1 Identification of Potentially Polluting Substances

A list of the major substances used, manufactured and stored within the installation (or waste by-products from the manufacturing process) is contained in the table of polluting substances. An assessment of their pollution potential has been made based upon their properties, toxicity and the volume stored. This information is recoded in detail in the Aspects Register of the Environmental

Management System (EMS). The materials and substances used within the installation are also assessed in the environmental risk assessments in the original permit application.

7.0 Table of Polluting Substances

The tables below are taken from the Site Condition Report written for the original permit application in support of the PPC application in 2022.

Assessment of Pollution Potential for Substances Associated with the Installation

Substance (contaminants)	Liquid or Solid	Volumes Stored	Toxicity/ Fate/ Mobility	Pollute land if released? Pollute land if released?	Considered Further?
Raw Materials					
Cereal grains, legumes, oil seed products & minerals	Solid (grains)	Various silos & bins totaling 3280 m3	Solid materials so limited mobility. 100% of material ends up in product. Large quantities used on site but biodegradable.	Unlikely	x
Vegetable oil	Liquid	2 x 60 m3 tanks	Biodegradable but mobile in the water environment. Used in relatively large quantities.	Possibly	✓
Liquids - Molasses	Liquid	2 x 60 m3 tanks	Conversion to organic acids via oxidation. High BOD would cause severe oxygen depletion in surface waters. Limited mobility due to high viscosity.	Possibly	✓
Vitamins & mineral additives	Powder	20 or 25kg bags	No persisting environmental effects; large volumes stored and potential suspended solids and high BOD levels in surface waters.	Possibly	✓
Packaged materials	Solid	Various materials: plastics, cardboard, paper bags	Non-toxic, non-pollutant. Not mobile.	Possibly	✓
Chemicals					
Salt (water softener)	Granular	Stored in 25kg bags	Corrosive effect on concrete. Nontoxic but groundwater contaminant.	Possibly	✓
Boiler treatment chemicals (scale and corrosion inhibitors, biocides)	Liquid	Stored in 25 litre drums	Small quantities used. Low likelihood of impact. Stable under ambient conditions. No bioaccumulation. Depletes oxygen in watercourses.	Possibly	✓
Fuels, Oils and Greases					
Lubricating oils	Liquid	In 205 and 25 litre drums	Slight health hazard, not an irritant, stable in storage. Moderate to high biodegradability.	Yes	✓
Products & Waste Materials					
General wastes	Solids	Stored in skips	Limited mobility, solids, biodegradable.	Unlikely	x
Surface and foul drainage (organic matter, chemical residues, hydrocarbons)	Liquid	Not known, drainage in pipework	Biodegradable but could impact groundwater quality locally.	Yes	✓
Scrap Metal	Solid	Stored in skips	Limited mobility, solids, low Degradability	Unlikely	x

Waste pallets	Solid	Stored outside, small quantities	Limited mobility, solids, moderate degradability	Unlikely	x

Assessment of the Effectiveness of Pollution Prevention Measures

Potentially Polluting Substance	Relevant System	Relevant Activity	Records Of Pollution	Containment Measures	Planned Testing & Inspection Regime*	Likelihood Of Pollution?
Vegetable Oil	Production and processing	Delivery	New site all required containment measures in place	Primary: Tanker Secondary: Fill point Above small bund Tertiary: Concrete hard standing and drainage system	Delivery is Supervised, material would quickly solidify if spilt.	Little Likelihood
		Storage	New site all required containment measures in place	Primary: Bulk storage tank Secondary: Concrete bund Tertiary: Concrete hard standing and drainage system	Visual checks as part of normal operations	Little Likelihood
		Transfer	New site all required containment measures in place	Primary: Above ground pipework Secondary: None Tertiary: Indoor flooring		Little Likelihood
Molasses	Production and processing	Delivery	New site all required containment measures in place	Primary: Tanker Secondary: Fill point Above small bund Tertiary: Concrete hard standing and drainage system	Delivery is supervised	**Slight possibility**
		Storage	New site all required containment measures in place	Primary: Bulk storage tank Secondary: Concrete bund Tertiary: Concrete hard standing and drainage system	Visual checks as part of normal operations	Little Likelihood
		Transfer	New site all required containment measures in place	Primary: Above ground pipework Secondary: None Tertiary: Indoor flooring		Little Likelihood
Minerals (bulk tanker delivery)	Production & processing	Delivery	New site all required containment measures in place	Primary: Tanker Secondary: None Tertiary: Concrete hard standing and drainage system	Delivery is supervised	**Slight possibility**
		Storage	New site all required containment measures in place	Primary: Bulk storage tank Secondary: None Tertiary: Indoor flooring	Visual checks as part of normal operations	Little Likelihood
		Transfer	New site all required containment measures in place	Primary: Above ground pipework Secondary: None Tertiary: Indoor flooring		Little Likelihood
Vitamins & mineral	Production &	Delivery	New site all required containment measures	Primary: Flatbed lorry Secondary: None	Delivery is supervised	Little Likelihood

additives (pallet delivery)	processing		in place	Tertiary: Indoor flooring		
		Storage	New site all required containment measures in place New site all required containment measures in place	Primary: Plastic/paper bags Secondary: Pallets Tertiary: Indoor flooring	Visual checks as part of normal operations	Little Likelihood
		Use	New site all required containment measures in place	Primary: Carousel bins Secondary: None Tertiary: Indoor flooring	Added to process by trained personnel	Little Likelihood
Salt	Production and processing	Delivery	New site all required containment measures in place	Primary: Tanker Secondary: none Tertiary: Concrete hard standing and drainage system	Delivery is supervised	**Slight possibility**
		Storage	New site all required containment measures in place	Primary: Bulk bin Secondary: None Tertiary: Indoor flooring	Visual checks as part of normal operations	Little Likelihood
		Use	New site all required containment measures in place	Primary: Bulk bin Secondary: Weighing machines Tertiary: Indoor flooring		Little Likelihood
Salt water softener	Water treatment	Delivery	New site all required containment measures in place	Primary: Flatbed lorry Secondary: 25kg bags Tertiary: Pallets	Delivery is supervised	Little Likelihood
		Storage/ Use	New site all required containment measures in place	Primary: 25kg bags Secondary: Pallets Tertiary: Concrete hard standing and drainage system	Visual checks as part of normal operations	Little Likelihood
Boiler treatment chemicals	Corrosion and scale inhibitors and biocides	Delivery	New site all required containment measures in place	Primary: Flatbed lorry Secondary: None Tertiary: Indoor flooring	Delivery is supervised	Little Likelihood
		Storage	New site all required containment measures in place	Primary: Plastic drums Secondary: None Tertiary: Indoor flooring	Visual checks as part of normal operations	Little Likelihood
		Use/ transfer	New site all required containment measures in place	Primary: Above ground pipework Secondary: Stainless steel tank Tertiary: Indoor flooring		Little Likelihood
Natural Gas	No on-site storage	Delivery	Metered delivery	Metered delivery	Permanent above ground pipework	Little Likelihood
		Storage	Metered delivery	Metered delivery	Visual checks as part of normal operations	Little Likelihood
		Transfer/ Use	Metered delivery	Primary: Above ground pipework Tertiary: Indoor flooring		Little Likelihood
Lubricating oil	Plant maintenance	Storage	New site all required containment measures in place	Primary: 205 litre drum (2) and 25litre containers Secondary: Catch tray Tertiary: Concrete hard standing and storm drainage system	Visual checks as part of normal operations	**Reasonable Possibility**
Waste oil	Oils arising from plant maintenance	Storage	New site all required containment measures in place	Primary:1,100 Litre Bulk storage tank Secondary: Bunded tank	Visual checks as part of normal	Little Likelihood

				Tertiary: Concrete hard standing and storm drainage system	operations	
Surface and foul drainage system	Site drainage	Site drainage	New site all required containment measures in place	Primary: Underground drainage network Secondary: **None** Tertiary: **None**	No CCTV or integrity testing of network to date	**Reasonable Possibility**

Figure 1.1.1 Site Plan

Appendix 2 – Plant Overview

The Dalton Mill installation manufactures compound animal feeds i.e., feeds which are suitable for consumption by an animal without further processing. It is intended to commission the installation in 2023. A wide range of mainly ruminant and poultry products to meet specific customer demands will be produced. Products are to be manufactured on four process lines. Typical production from the installation will total up to approximately 250,000 tonnes per year eventually (when the site is fully developed). The installation will typically operate 24 hours a day, 5 or 6 days a week and for 52 weeks a year. Directly associated activities include steam generation and storage and handling of raw materials and waste.

The products manufactured are based upon core formulations of cereals, vegetable proteins, oilseed extraction products, vegetable oils etc, plus specific additives, such as mineral and vitamin supplements. The processing is undertaken to a specific formulation on a batch basis, with the key stages including weighing, grinding, mixing, conditioning, pressing, cooling and coating.

Depending upon the specific formulation, the required cereals etc. are put in enclosed weighers prior to grinding to a uniform grist size. The ground materials are then transferred in enclosed conveyors to the mixing stage of the process, where they can be mixed with vegetable oils and water. Following this, the mix is conditioned by the addition of steam to improve the workability of the mix. After conditioning the hot mix is conveyed to specific press lines. At each press the mix is extruded through a die to produce pellets of a specific size. The hot pellets are then passed through an associated counter flow air cooler, where ambient air is used to cool the pellets in order to reduce pellet temperature and improve the pellet durability prior to subsequent storage and dispatch. Some products are then subsequently coated with vegetable oil to produce the finished product. The finished products are then conveyed to storage silos prior to dispatch to customers. Products are automatically loaded into bulk vehicles for delivery to customers on an as required basis.

Suitable controls are in place for handling of raw materials, wastes and products such that the potential for emissions for these activities is minimised. Where appropriate, a range of abatement systems are employed throughout the process to remove particulate matter. The main discharges to air are emissions from 4 product coolers. These pass through cyclones before discharging to atmosphere. There will also be two grinding systems which are abated by reverse jet bag filters.

The installation has an attenuation tank for surface water, to collect the water from roofs and hardstanding areas. Surface water is then discharged to a nearby beck to the west of the site.

I'Anson Bros Ltd operations at the installation will be party to the negotiated Climate Change Levy Agreement (CCLA) through the Agricultural Industries Confederation (AIC) trade body in place ahead of commission.

Appendix 3 - Infrastructure Monitoring Protocols

Infrastructure	Protocol	Monitoring Frequency	Assessment Personnel
Roadways & hardstanding	Visual inspection in accordance with developed 'operating procedures'	All areas (& roadways) – annually	Appropriately trained personnel / managed by the Production Manager
Sub surface structures	Visual inspection in accordance with developed 'operating procedures'	Visual inspection of drains annually & of interceptors quarterly	Appropriately trained personnel / managed by the Production Manager
Secondary containment (bunding arrangements)	Visual inspection for leaks or cracks	All bunds – once/month	Appropriately trained personnel / managed by the Production Manager
Pipe work and bulk tanks	Visual inspection for a loss of integrity Specialist statutory work (pressure systems etc)	All bulk tanks and associated pipe work annually As per relevant regulations or manufacturers recommendations	Appropriately trained personnel / managed by the Production Manager
Operation of abatement systems	Visual inspection of cooler cyclones and bag filters and the continuous monitoring system	Annual isokinetic test and daily inspections	Production Manager & EMS coordinator
Waste handling and storage	Visual inspection of waste areas	Weekly	EMS coordinator
Boiler plant	Arranging daily and weekly checks and annual service to boiler and burner steam and condensate checks TDS, Excess O^2 & hotwell tank temp	Various as per form EMS F2	Production Manager

Forms

EMS MONITORING FORM NO. 1												
DAILY CHECKS FOR EMISSIONS TO AIR, GROUND & WATER AND CORRECT OPERATION OF ABATEMENT EQUIPMENT AND EMERGENCY EQUIPMENT												
EMISSIONS TO AIR (DUST, NOISE & Smell) Yes - Y No - N continuous - C Intermittent - I	MON		TUE		WED		THU		FRI		SAT	
COOLER STACKS												
FUGITIVE EMISSIONS INTAKE												
FUGTIVE EMISSIONS BULK LOADING												
VISIBLE SMOKE BOILER CHIMNEY												
NOISE LEVEL AT BOUNDARY DOWNWIND 0 - Zero 1 - Detectable 2 - Offensive												
ODOUR AT BOUNDARY DOWN WIND 0 - Zero 1 - Detectable 2 - Offensive												
PLANT & EQUIPMENT CONDITION CHECKS Initial to indicate OK or A Action needed												
CHECK LEVs FOR LEAKS												
CHECK CYCLONE DUST DISCHARGE IS CLEAR												
CHECK LIQUIDS AREA DRIP TRAY & BUCKETS IN PLACE & EMPTY												
CHECK INTEGRITY OF TANKS, BUND & PIPEWORK												
CHECK SPILL KIT CONTENTS												
CHECK WATER BEING DISCHARGED TO BECK AT W1 IS CLEAN & CLEAR OF OIL & GREASE												
COMMENTS / ACTIONS TAKEN												

ENVIRONMENTAL INSPECTIONS

RESPONSIBILITY:	MAINTENANCE ENGINEER							EMS Form 2							WEEK No.								YEAR:					
EQUIPMENT	**CHECKS**	**Wk 1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**	**18**	**19**	**20**	**21**	**22**	**23**	**24**	**25**	**26**
Liquids handling	pipes, pumps, meters &valves																										
Tanks	EH levels & alarms. Pipework sound																										
Bag filters	replacement programme																										
Cooler cyclones	iso kinetic & probe inspection																										
Interceptors	structurally sound																										
Interceptors	empty and disposal																										
Bunds	empty and disposal																										
Drains	structurally sound																										
Hardstanding	structurally sound																										
Waste	correct storage in designated containers & area. No leaks																										
Boiler	service																										
Boiler	steam & cond leaks trap checks																										
Boiler	TDS, excess O2 & hotwell temp																										
LEV	service																										
EQUIPMENT	**CHECKS**	**27**	**28**	**29**	**30**	**31**	**32**	**33**	**34**	**35**	**36**	**37**	**38**	**39**	**40**	**41**	**42**	**43**	**44**	**45**	**46**	**47**	**48**	**49**	**50**	**51**	**52**
Liquids handling	pipes, pumps, meters &valves																										
Tanks	EH levels & alarms. Pipework sound																										
Bag filters	replacement programme																										
Cooler cyclones	iso kinetic & probe inspection																										
Interceptors	structurally sound																										
Interceptors	empty and disposal																										
Bunds	empty and disposal																										
Drains	structurally sound																										
Hardstanding	structurally sound																										
Waste	correct storage in designated containers & area. No leaks																										
Boiler	service																										
Boiler	steam & cond leaks trap checks																										
Boiler	TDS, excess O2 & hotwell temp																										

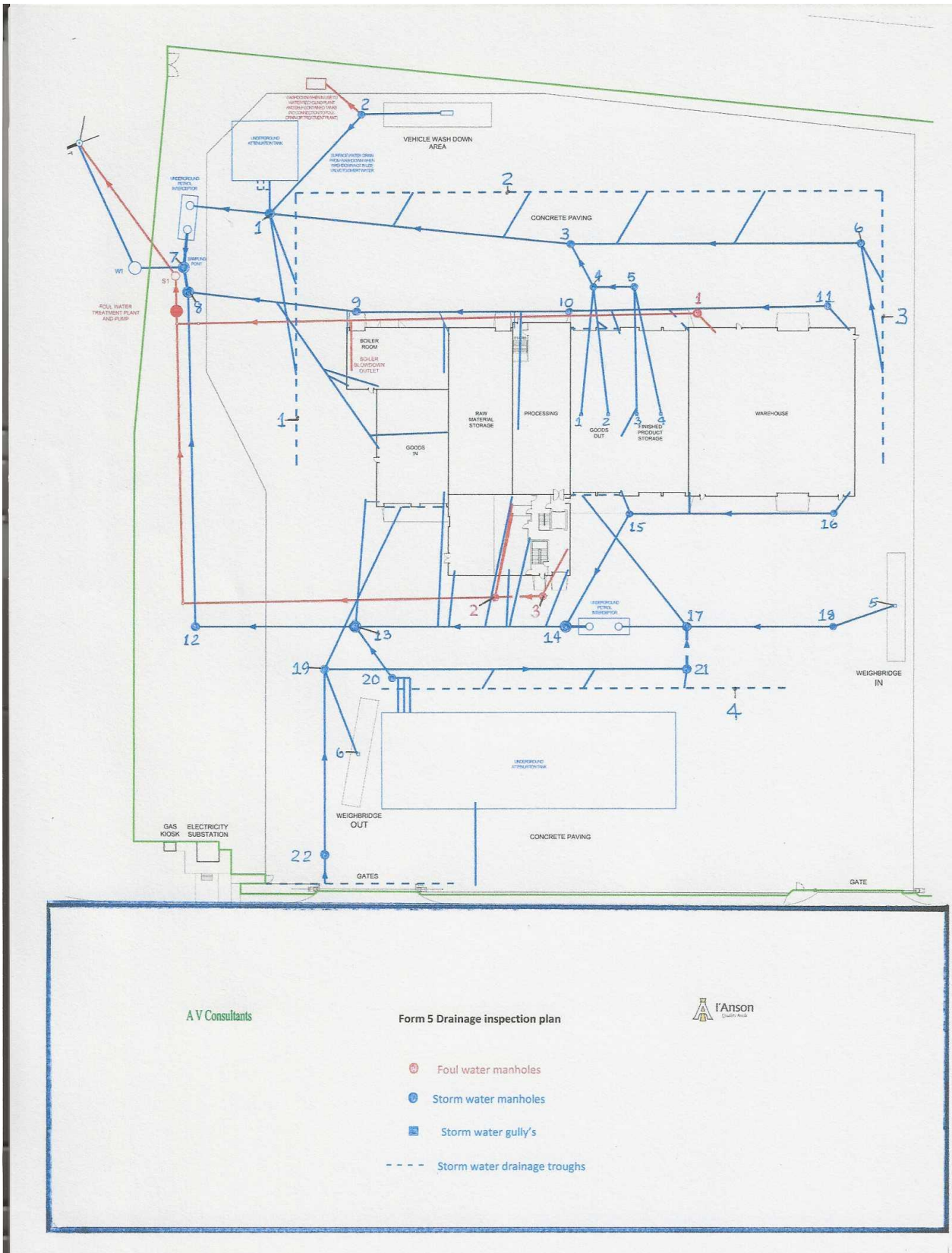
Inspection Actions

EMS Form 3

Servicing details are maintained in the Engineers Maintenance log for the following items of plant:-
Liquids Handling - Pumps and Meters **Boiler -** TDS, O2 and Hotwell temp
Bag Filters - Replacements
Cyclones - Iso kinetic measurements
Boiler - Inspection and service

Actions required as a result of the remaining inspections are recorded below:-	
Pipe replacemnts/repairs	Bund and Interceptor repairs
Probe replacement	Drain repairs
Interceptor empty	Waste containment
Bund empty	Annual drainage and hard-standing inspection

Date	Action taken	Initial

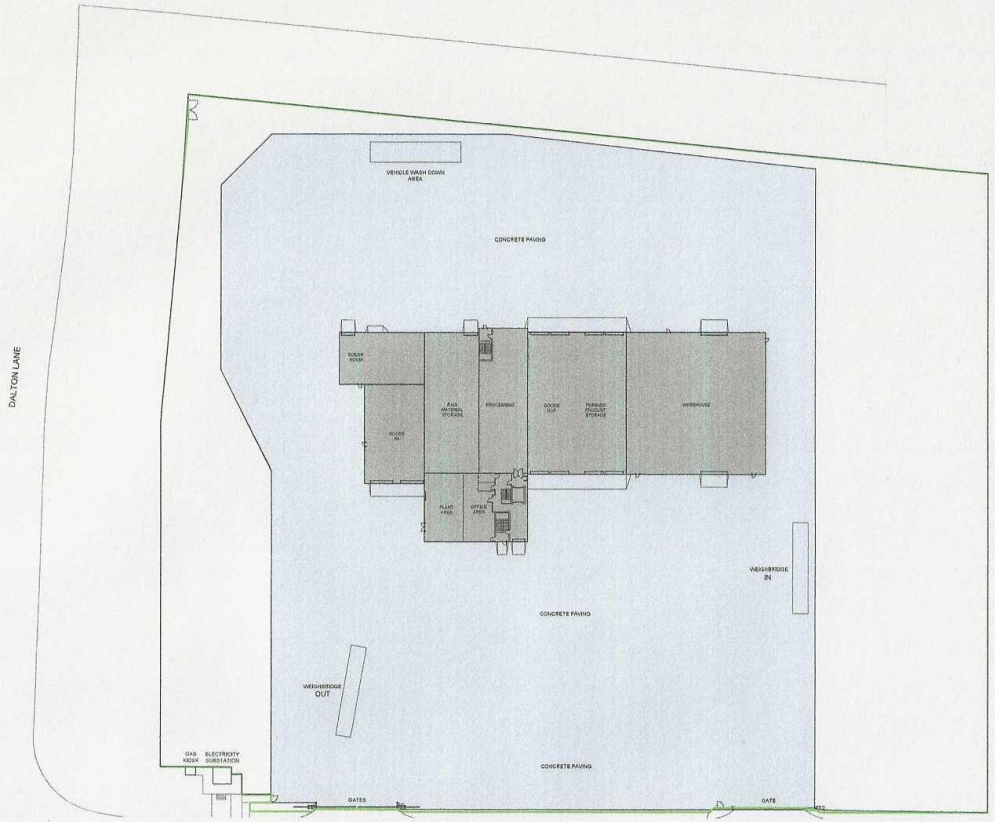


A V Consultants

Form 5 Drainage inspection plan

l'Anson

- Foul water manholes
- Storm water manholes
- Storm water gully's
- Storm water drainage troughs



A V Consultants

Form 5A Hardstanding inspection plan

l'Anson

K Baker Design&Development

INTEGRATED DESIGNBUILD-DEVELOPMENT

SITE SURFACING

DRAWING No. IANSON EA04 SCALE 1:400 @ A1 JAN 2022

Record defects on form 5B

SITE SURFACING

A V Consultants

Annual Drains & hard standing inspection

l'Anson Quality Feeds

Form 5B	Refer to forms 5 & 5A	
Item / Area	Condition / Work required	Work completed
Inspection		
Foul water drains		
S1. Sampling point		
1. Foul water manhole		
2. Foul water manhole		
3. Foul water manhole		
Storm water drains		
W1. Sampling point		
1. Storm water manhole		
2. Storm water manhole		
3. Storm water manhole		
4. Storm water manhole		
5. Storm water manhole		
6. Storm water manhole		
7. Storm water manhole		
8. Storm water manhole		
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16. Storm water manhole		
17. Storm water manhole		
18. Storm water manhole		
19. Storm water manhole		
20. Storm water manhole		
21. Storm water manhole		
22. Storm water manhole		
1. Storm water gully		
1. Storm water gully		
1. Storm water gully		
1. Storm water gully		
1. Storm water gully		
1. Storm water gully		
1. Storm drainage trough N		
2. Storm drainage trough E		
3. Storm drainage trough S		
4. Storm drainage trough W		
Hard standing inspection		
Indicate position of fault on form 5A		

l'Anson Quality Feeds

l'Anson Bros Ltd Environmental Management System

ENVIRONMENTAL EXTERNAL COMMUNICATION / COMPLAINT FORM (EECF)

Version No:	1	Issued Date:	28 February 2022	Issued By:	Operations Manager

Complaint / Comment Ref No.							
Comment / Complaint received by: ..... **Date:** ..... **Passed to:** ..... **Date:** ..... **Mill Manager informed?** ..... **Date:**							
Type of Communication	Complaint		Request for Information		Incident		

DETAILS OF COMPLAINANT / 3RD PARTY REQUESTING INFORMATION

Name:	
Address:	
Contact Telephone No.:	
Contact e-mail:	

ABOUT THE COMMUNICATION / COMPLAINT

How was the communication received (tick appropriate box)?	**Customer Feedback Form**	
	Written statement (letter / e-mail / fax etc)	
	Verbal feedback (phone call / face to face etc)	
Brief description of comment / complaint **(Attach copy of written communication if applicable)**		

Does the complaint / communication impact on our PPC Permit Conditions?	**Yes**	**No**
If Yes - has the Environment Agency been informed?	**Yes**	**No**

Follow-up **or** **Corrective Action Plan (as applicable):**	

Signed Mill Manager:	**Date:**	
Signed EMS Co-ordinator:	**Date:**	

VERIFICATION OF CLOSE-OUT / CORRECTIVE ACTION

Closed Out Verification of Corrective Action	**Comments:**	
	Signed:	**Completion Date:**

Note: For all Complaints a copy must be sent to the Chairman & Operations Manager

NON-CONFORMANCE AND INCIDENT REPORTING FORM (NCIR)

Version No:	1	Issue Date:	28 February 2022	Issued By:	Operations Manager

Report Number:	
Date and Time of Non-conformance/Incident:	
Area where Non-conformance/Incident occurred:	
Is Incident reportable under Site PPC Permit Schedule 5?	**Yes* / No**
Description/Nature of Non-conformance/Incident:	
Effects:	
Immediate (Corrective) action taken:	
Preventative Action proposed/taken (where appropriate):	

Signed:	**Name:**	**Date:**
Copy To: Operations Manager	**Ref EMS Procedures: SP05 and SP08**	

Site plan Location of spill kits

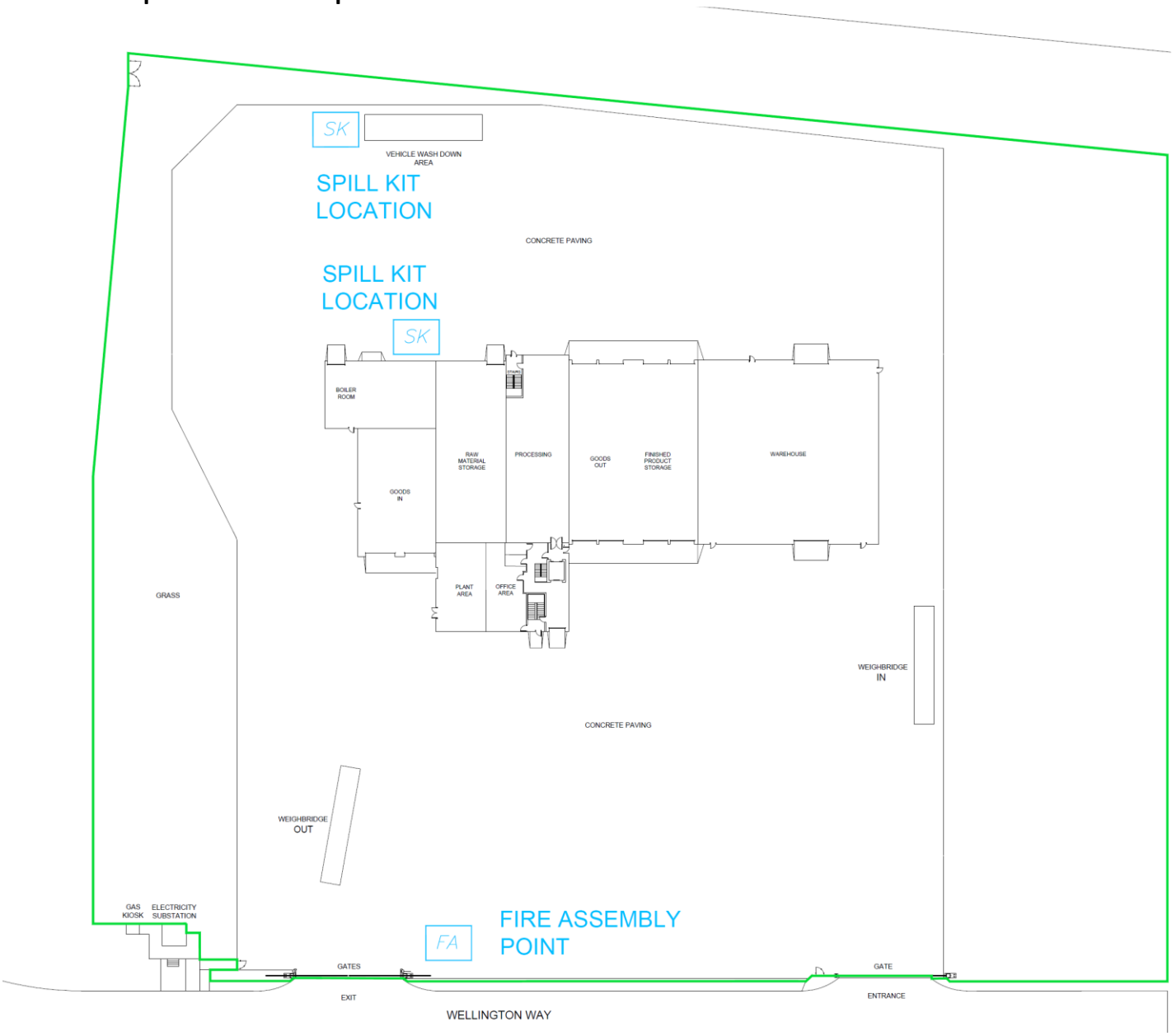

Figure 1.1.3 Site Drainage plan

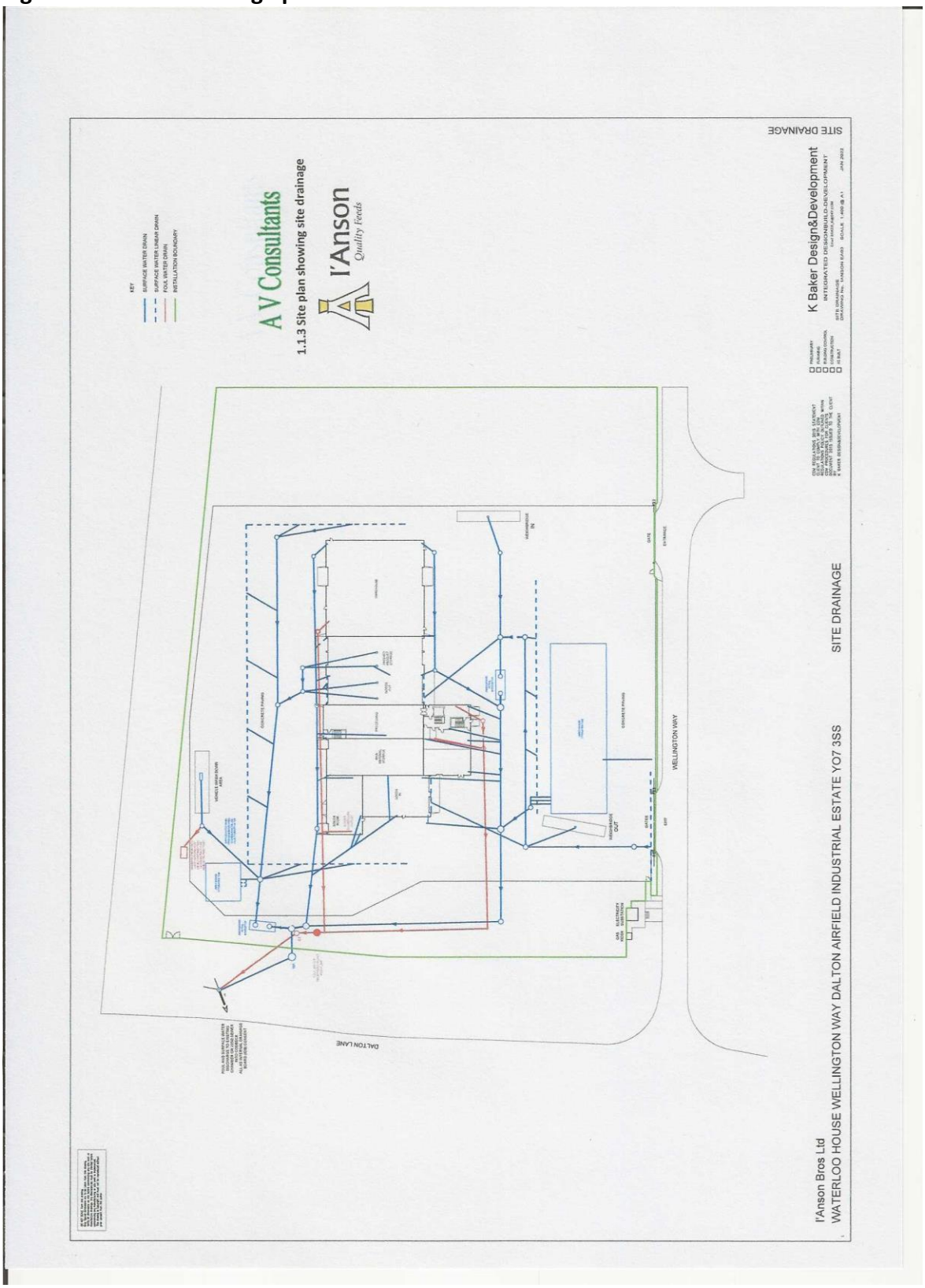

Figure 1.1.2 Releases to atmosphere