

Mr Tony Leggett
Stoke Ferry Feed Mill
The Hall
Stoke Ferry
PE33 9SE

Our ref: EPR/AP3337HF/V003

Your ref:

Date: 5th May 2017

Dear Mr Leggett,

Returning your permitting application

Application reference: EPR/AP3337HF/V003

Operator: 2 Agriculture Limited

Facility: Llay Feed Mill, Miners Road, Llay Industrial Estate, Wrexham, LL12 0PJ

Thank you for your application of 11th April 2017. Unfortunately we must return it to you because it is incomplete. The missing information and other relevant requirements are summarised below:

Application Form C2

Q2b – the application must include a non-technical summary which provides brief details of the proposed changes to current activities and the new activities you want to add to your permit.

Q3d3 – no response given. A summary of your Environmental Management System (EMS) must be included in your application and referenced in the answer to this question. The summary should clearly state the plan for including the new extrusion line in you EMS.

Q5a – site plan. If the inclusion of the new extrusion line in the permit will result in the addition of new emission points and / or new buildings then you must provide a

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

revised site plan that incorporates this information. The installation boundary must be clearly shown in green and should include some nearby features (e.g. adjacent roads) to show the installation in the context of its immediate surroundings. The location of all emission points to air, water and land also need to be marked on the site plan.

Q6 – Environmental Risk Assessment. An appropriate risk assessment must be provided. Please refer to the '[Risk assessments for your environmental permit](#)' page of the gov.uk website, in particular the guidance on completing risk assessments given under the heading 'Risks from your site' on this page. You will also need to use the Environment Agency's risk assessment tool (also known as the H1 assessment tool) to complete an environmental assessment of the risks from emissions from the new extrusion line. More information on the tool and how to obtain it is available on the gov.uk webpage referred to above. All **new** emission points to air, water, sewer and land must be included in this assessment. The assessment needs to be based on the emission limit values (ELVs) that you propose be set in the permit (i.e. BAT emission benchmarks set out in technical guidance note EPR 6.10 'The Food and Drink Sector' and must include all the relevant pollution parameters associated with the new line.

There are European Habitats Sites and other non-statutory wildlife sites within the relevant screening distance of the installation. Therefore the application must consider the impact of releases to air and water on these sites. An environmental risk assessment must be provided which includes a habitats impact assessment in line with the guidance contained in the relevant H1 annexes.

Application Form C3

Table 1a – the information in this table needs to accurately reflect the activity applied for and all sections need to be completed. Please ensure that the scope of the installation is fully defined. For example, the new extrusion line may be a Directly Associated Activity to the main Listed Activity.

Table 2 – the information in this Table suggests there will be point source emissions to air associated with the 'Grinder', 'Cooler' and 'Extruder', however, no information has been provided on:

- the location and design of these emission points;
- the expected pollution parameters that will be associated with these emission points;
- the abatement plant that will be used to control emissions (if abatement plant is required); and
- the monitoring methods that will be used to confirm compliance with the permit.

The application also does not indicate whether there will be any emissions to controlled water for surface water run-off or emissions to sewer associated with the activity.

Table 3a – you must provide details of the main measures you will use to control the main issues identified in the H1 assessment and assess the activity against the indicative Best Available Techniques (BAT) described in the technical guidance note EPR 6.10 'The Food and Drink Sector' and our 'How to Comply with Your Environmental Permit' must be provided.

Table 3b – you must consider whether the Environmental Risk Assessment or appropriate technical guidance show that emissions of substances not controlled by

emission limits, noise or vibration, odour, fire are important issues associated with the new extrusion plant. If any of these issues are deemed important you must provide updated management plans as appropriate.

Q4a – you need to describe in detail the monitoring regime you propose and justify your choice by referring to the relevant technical guidance.

Q4b – you need to describe the emission points and provide an assessment of the sampling locations used to measure point source emissions to air. The assessment must refer to Technical Guidance Note 'M1: Sampling Requirements for Stack Emissions Monitoring.' Please confirm whether or not any proposed emissions monitoring will meet the Environment Agency's Monitoring Certification Scheme (MCERTS) standard.

Q6d – no response given. Please assess the measures used to ensure the efficient use of raw materials against the indicative BAT measures listed in technical guidance note EPR 6.10 'The Food and Drink Sector' and 'How to Comply with Your Environmental Permit.' A comparison must be provided with the application.

Application Form F

Table 1 – as your installation is classed as a Tier 3 facility the charge for a normal variation will be your current OPRA score multiplied by the relevant charge multiplier, which for normal variations is 57. Please see our Charging Scheme for more information, which is available on the 'Our charges' page of our website.

OPRA profile – you need to submit an OPRA with your application using the current version of the OPRA profile spreadsheet. This is available to download from the 'Our charges' page of our website.

If you still want to carry out this activity you must submit a complete application with the full fee and appropriate supporting information. I recommend that you talk to your local Area Officer, Rhys Ellis, about your application before you complete it. Rhys's direct number is 03000 653543.

Guidance on preparing an Environmental Permit variation application is provided on our website at:

<http://www.naturalresources.wales/permits-and-permissions/installations/apply-to-vary-change-a-permit-for-installations/?lang=en>

We'll refund your fee separately.

If you have any questions about this letter please phone me on 03000 654588 or email victoria.seller@cyfoethnaturiolcymru.gov.uk.

Yours sincerely,



Victoria Seller
Senior Permitting Officer