

Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2007

Wrexham Convenience Foods
(Rowan Foods)

Oscar Mayer Limited (trading as
Rowan Foods Limited)
Ash Road South
Wrexham Industrial Estate
Wrexham
LL13 9UG

Permit number
EPR/WP3534GX

Wrexham Convenience Foods (Rowan Foods)

Permit Number EPR/WP3534GX

Introductory note

This introductory note does not form a part of the permit

The main features of the facility are as follows. Rowan foods is a food processing factory situated on Wrexham Industrial Estate. The site produces a variety of ready meals from a wide range of fresh, frozen and chilled food ingredients. Food ingredients have all undergone prior processing. Activities on site comprise further preparation, cooking, meal assembly, cooling and packing. The majority of the site's production takes the form of chilled ready meals, the remainder are frozen. The activities produce waste food and waste packaging. Contaminated waste water is given simple treatment on site before discharge to sewer. The facility is within the Dee Water Protection Zone and holds a consent to operate from the Environment Agency under DWPZ order.

The status log of the permit sets out the permitting history, including any changes to the permit reference number

Status Log of the permit		
Detail	Date	Response Date
Application EPR/WP3534GX/A001	Duly made 11/03/2009	
Additional Information	19/03/2009	24/03/2009
Additional Information	13/05/2009	20/05/2009
Permit EPR/WP3534GX determined	10/09/09	

End of Introductory Note

Permit

Permit number

EPR/WP3534GX

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2007

Oscar Mayer Limited (trading as Rowan Foods Limited) ("the operator"),

whose registered office is

Hailey Road Business Park

Erith

Kent

DA18 4AR

company registration number 01239606

to operate a facility comprising an installation at

Ash Road South

Wrexham Industrial Estate

Wrexham

LL13 9UG

to the extent authorised by and subject to the conditions of this permit.

Name	Date
<i>M. A. Bischer</i>	10/09/09

M. Bischer – Team Leader, National Permitting Service

Authorised on behalf of the Agency

1 Management

1.1 General management

1.1.1 The activities shall be managed and operated:

- (a) in accordance with a management system, which identifies and minimises risks of pollution, including those arising from operations, maintenance, accidents, incidents, non-conformances and closure and those drawn to the attention of the operator as a result of complaints; and
- (b) by sufficient persons who are competent in respect of the responsibilities to be undertaken by them in connection with the operation of the activities.

1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.

1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

1.2 Accident management plan

1.2.1 The operator shall:

- (a) maintain and implement an accident management plan;
- (b) review and record at least every 4 years or as soon as practicable after an accident, (whichever is the earlier) whether changes to the plan should be made;
- (c) make any appropriate changes to the plan identified by a review.

1.3 Energy efficiency

1.3.1 For the following activities referenced in schedule 1, table S1.1 (A1 to A4) The operator shall:

- (a) take appropriate measures to ensure that energy is used efficiently in the activities;
- (b) review and record at least every 4 years whether there are suitable opportunities to improve the energy efficiency of the activities; and
- (c) take any further appropriate measures identified by a review.

1.4 Efficient use of raw materials

1.4.1 For the following activities referenced in schedule 1, table S1.1 (A1 to A4) The operator shall:

- (a) take appropriate measures to ensure that raw materials and water are used efficiently in the activities;
- (b) maintain records of raw materials and water used in the activities;
- (c) review and record at least every 4 years whether there are suitable alternative materials that could reduce environmental impact or opportunities to improve the efficiency of raw material and water use; and
- (d) take any appropriate further measures identified by a review.

1.5 Avoidance, recovery and disposal of wastes produced by the activities

1.5.1. For the following activities referenced in schedule 1, table S1.1 (A1 to A4) The operator shall:

- (a) take appropriate measures to ensure that waste produced by the activities is avoided or reduced, or where waste is produced it is recovered wherever practicable or otherwise disposed of in a manner which minimises its impact on the environment;
- (b) review and record at least every 4 years whether changes to those measures should be made; and
- (c) take any further appropriate measures identified by a review.

2 Operations

2.1 Permitted activities

2.1.1 The operator is authorised to carry out the activities specified in schedule 1 table S1.1 (the "activities").

2.2 The site

2.2.1 The activities shall not extend beyond the site, being the land shown edged in green on the site plan at schedule 2 to this permit.

2.3 Operating techniques

- 2.3.1 (a) The activities shall, subject to the conditions of this permit, be operated using the techniques and in the manner described in the documentation specified in schedule 1, table S1.2, unless otherwise agreed in writing by the Agency.
- (b) If notified by the Agency that the activities are giving rise to pollution, the operator shall submit to the Agency for approval within the period specified, a revision of any plan specified in schedule 1, table S1.2 or otherwise required under this permit, and shall implement the approved revised plan in place of the original from the date of approval, unless otherwise agreed in writing by the Agency.

2.4 Improvement programme

- 2.4.1 The operator shall complete the improvements specified in schedule 1 table S1.3 by the date specified in that table unless otherwise agreed in writing by the Agency.
- 2.4.2 Except in the case of an improvement which consists only of a submission to the Agency, the operator shall notify the Agency within 14 days of completion of each improvement.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to water, air or land except from the sources and emission points listed in schedule 4 tables S4.1 and S4.8.
- 3.1.2 The limits given in schedule 4 shall not be exceeded.

3.2 Fugitive emissions of substances

- 3.2.1 Fugitive emissions of substances (excluding odour, noise and vibration) shall not cause pollution. The operator shall not be taken to have breached this condition if appropriate measures, including, but not limited to, those specified in any approved fugitive emissions management plan, have been taken to prevent or where that is not practicable, to minimise, those emissions.
- 3.2.2 The operator shall:
 - (a) if notified by the Agency that the activities are giving rise to pollution, submit to the Agency for approval within the period specified, a fugitive emissions management plan;
 - (b) implement the approved fugitive emissions management plan, from the date of approval, unless otherwise agreed in writing by the Agency.
- 3.2.3 All liquids, whose emission to water or land could cause pollution, shall be provided with secondary containment, unless the operator has used other appropriate measures to prevent or where that is not practicable, to minimise, leakage and spillage from the primary container.

3.3 Odour

- 3.3.1 Emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved odour management plan, to prevent or where that is not practicable to minimise the odour

- 3.3.2 The operator shall:
- (a) if notified by the Agency that the activities are giving rise to pollution outside the site due to odour, submit to the Agency for approval within the period specified, an odour management plan;
 - (b) implement the approved odour management plan, from the date of approval, unless otherwise agreed in writing by the Agency.

3.4 Noise and vibration

- 3.4.1 Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan to prevent or where that is not practicable to minimise the noise and vibration.

- 3.4.2 The operator shall:
- (a) if notified by the Agency that the activities are giving rise to pollution outside the site due to noise and vibration, submit to the Agency for approval within the period specified, a noise and vibration management plan;
 - (b) implement the approved noise and vibration management plan, from the date of approval, unless otherwise agreed in writing by the Agency.

3.5 Monitoring

- 3.5.1 The operator shall, unless otherwise agreed in writing by the Agency, undertake the monitoring specified in the following tables in schedule 4 to this permit:
- (a) point source emissions specified in tables S4.1 and S4.8;
- 3.5.2 The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.
- 3.5.3 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme and the environmental or other monitoring specified in condition 3.5.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate) unless otherwise agreed in writing by the Agency.

4 Information

4.1 Records

4.1.1 All records required to be made by this permit shall:

- (a) be legible;
- (b) be made as soon as reasonably practicable;
- (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
- (d) be retained, unless otherwise agreed in writing by the Agency, for at least 6 years from the date when the records were made, or in the case of the following records until permit surrender:
 - (i) off-site environmental effects; and
 - (ii) matters which affect the condition of the land and groundwater.

4.1.2 All records, plans and the management system required to be maintained by this permit shall be held on the site where practicable or other location agreed in writing and controlled by the operator.

4.2 Reporting

4.2.1 All reports and notifications required by the permit shall be sent to the Agency using the contact details supplied in writing by the Agency

4.2.2 *For the following activities referenced in schedule 1, table S1.1 (A1 to A4)* A report or reports on the performance of the activities over the previous year shall be submitted to the Agency by 31 January (or other date agreed in writing by the Agency) each year. The report(s) shall include as a minimum:

- (a) a review of the results of the monitoring and assessment carried out in accordance with the permit including an interpretive review of that data;
- (b) the annual production /treatment data set out in schedule 5 table S5.2; and
- (c) the performance parameters set out in schedule 5 table S5.3 using the forms specified in table S5.4 of that schedule.

4.2.3 The operator shall, unless notice under this condition has been served within the preceding 4 years, submit to the Agency, within 6 months of receipt of a written notice, a report assessing whether there are other appropriate measures that could be taken to prevent, or where that is not practicable, to minimise pollution.

4.3 Notifications

4.3.1 The Agency shall be notified without delay following the detection of:

- (a) any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution;
 - (b) the breach of a limit specified in the permit; or
 - (c) any significant adverse environmental effects.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 6 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Agency when the relevant monitoring is to take place. The operator shall provide this information to the Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:

Where the operator is a registered company:

 - (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.

Where the operator is a corporate body other than a registered company:

 - (a) any change in the operator's name or address; and
 - (b) any steps taken with a view to the dissolution of the operator.

In any other case:

 - (a) the death of any of the named operators (where the operator consists of more than one named individual);
 - (b) any change in the operator's name(s) or address(es); and
 - (c) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.
- 4.3.5 Where the operator proposes to make a change in the nature or functioning, or an extension of the activities, which may have consequences for the environment and the change is not otherwise the subject of an application for approval under the Regulations or this permit:
 - (a) the Agency shall be notified at least 14 days before making the change; and
 - (b) the notification shall contain a description of the proposed change in operation.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 7 shall have the meaning given in that schedule.

- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made “without delay”, in which case it may be provided by telephone.

Schedule 1 - Operations

Table S1.1 activities			
Activity reference	Activity listed in Schedule 1 of the EP Regulations	Description of specified activity	Limits of specified activity
A1	S6.8 A1 (d) (i)	Manufacture of chilled and frozen food products derived from raw materials with a finished product production capacity of more than 75 tonnes per day	From receipt of raw materials to despatch of finished product
A2	S5.3 A1 (c) (ii)	Treatment of process effluent by settlement and the removal of sludge produced	Collection of untreated effluent through site drainage system to discharge of effluent to sewer
Directly Associated Activity			
A3	Operation of steam boilers	2 x 3MWth gas/gas-oil boilers	Receipt of fuels to emissions of combustion gases
A4	Waste handling and storage	Storage and handling of waste product, effluent sludge and other wastes	Receipt of raw materials to disposal of waste products

Table S1.2 Operating techniques

Description	Parts	Date Received
Application	The response to section B2 to B9 in the application	02/01/2009
Additional Information	Supplementary Stack and Emission Information	24/03/2009
Additional Information	Response to Questions regarding Drains, Hardstanding & Bunds	20/05/2009

Table S1.3 Improvement programme requirements

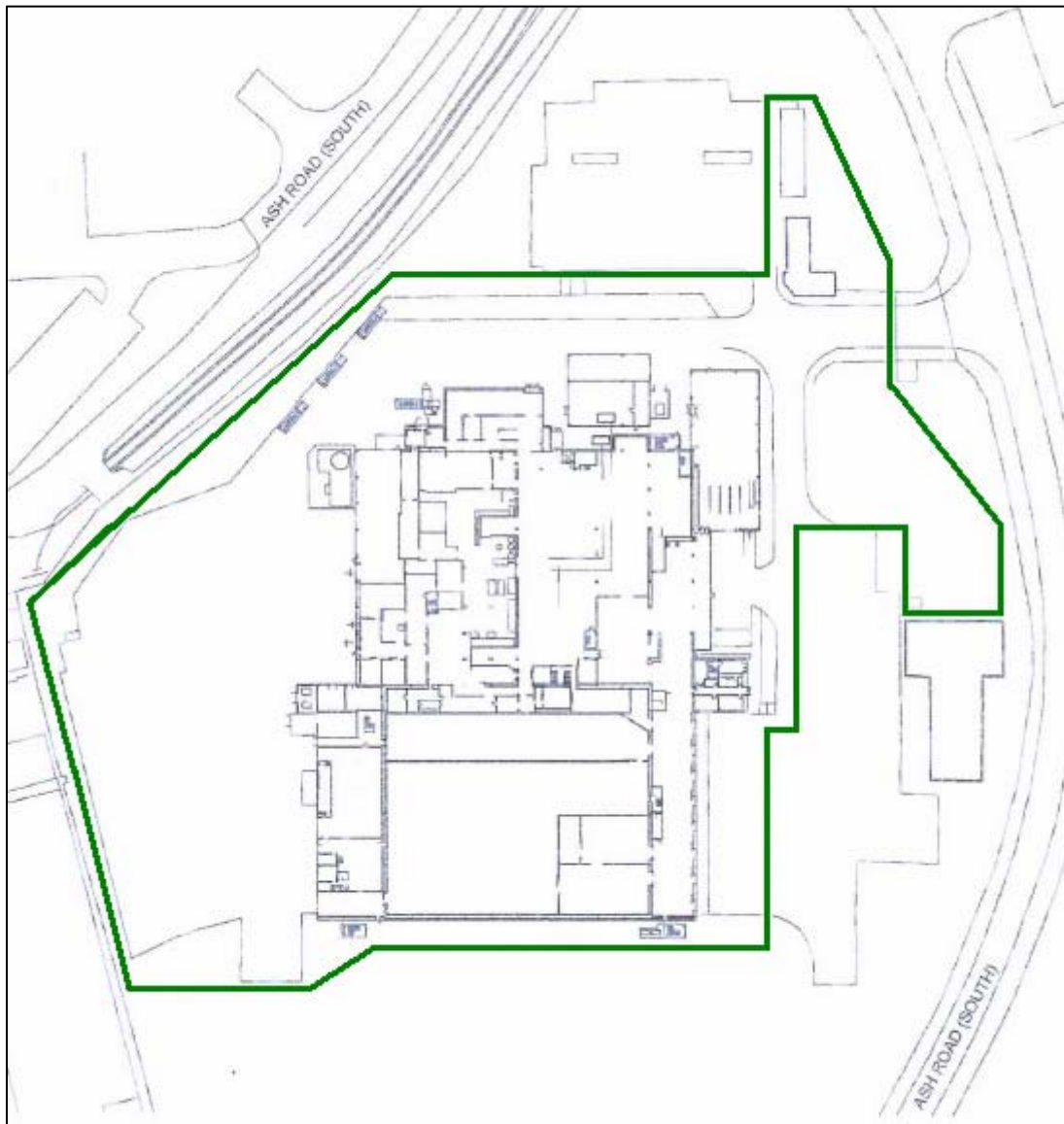
Reference	Requirement	Date
IP1	A written report shall be submitted to the Agency for approval detailing the results of a survey to determine the integrity, adequacy and suitability of existing hardstanding, kerbing and secondary containment and bunding for above and below ground structures as well as waste storage areas and the measures to comply with the requirements of How to comply with your environmental permit – Getting the basics right (EPR 1.00) and How to comply with your environmental permit The food and drink sector (EPR 6.10). This shall include but not be limited to an inspection and maintenance program for all relative equipment identified. Where appropriate the report shall contain timetabled dates for the implementation of individual measures. You must implement the plan from the date of approval in writing by the Environment Agency The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.	01/04/2010
IP2	The Operator shall submit a written report to the Environment Agency for approval. The report shall assess the condition and integrity of the Diesel storage tank in line with PPG2 Above ground oil storage tanks. The report will include an action plan with timescales for implementing improvements identified. You must implement the plan from the date of approval in writing by the Environment Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.	01/04/2010
IP3	The Operator shall submit a written report to the Environment Agency for approval. The report shall assess storage and containment measures of all chemicals and raw materials stored within buildings to ensure that all process drains are protected in line with How to comply with your environmental permit – Getting the basics right and PPG26 storage & handling of drums & intermediate bulk containers. The report will include an action plan with timescales for implementing improvements identified. You must implement the plan from the date of approval in writing by the Environment Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.	01/04/2010
IP4	The Operator shall undertake a survey to assess the adequacy of the construction and condition of the site drainage system with the purpose of preventing fugitive emissions to surface water, ground water and land. A written report summarising the survey and proposals for improvements shall be submitted to the Agency. A timescale for implementation of any improvements shall be approved by the Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.	01/12/2010
IP5	The Operator shall submit a written Fugitive Emissions plan to the Environment Agency for approval. The plan will identify the possible fugitive emissions from the site, the preventive measures in place, maintenance of the preventive measures and periodic review of the measures in place. You must implement the plan from the date of approval in writing by	01/12/2010
Permit Number EPR/WP3534GX		10/09/2009/09/2009

the Environment Agency.

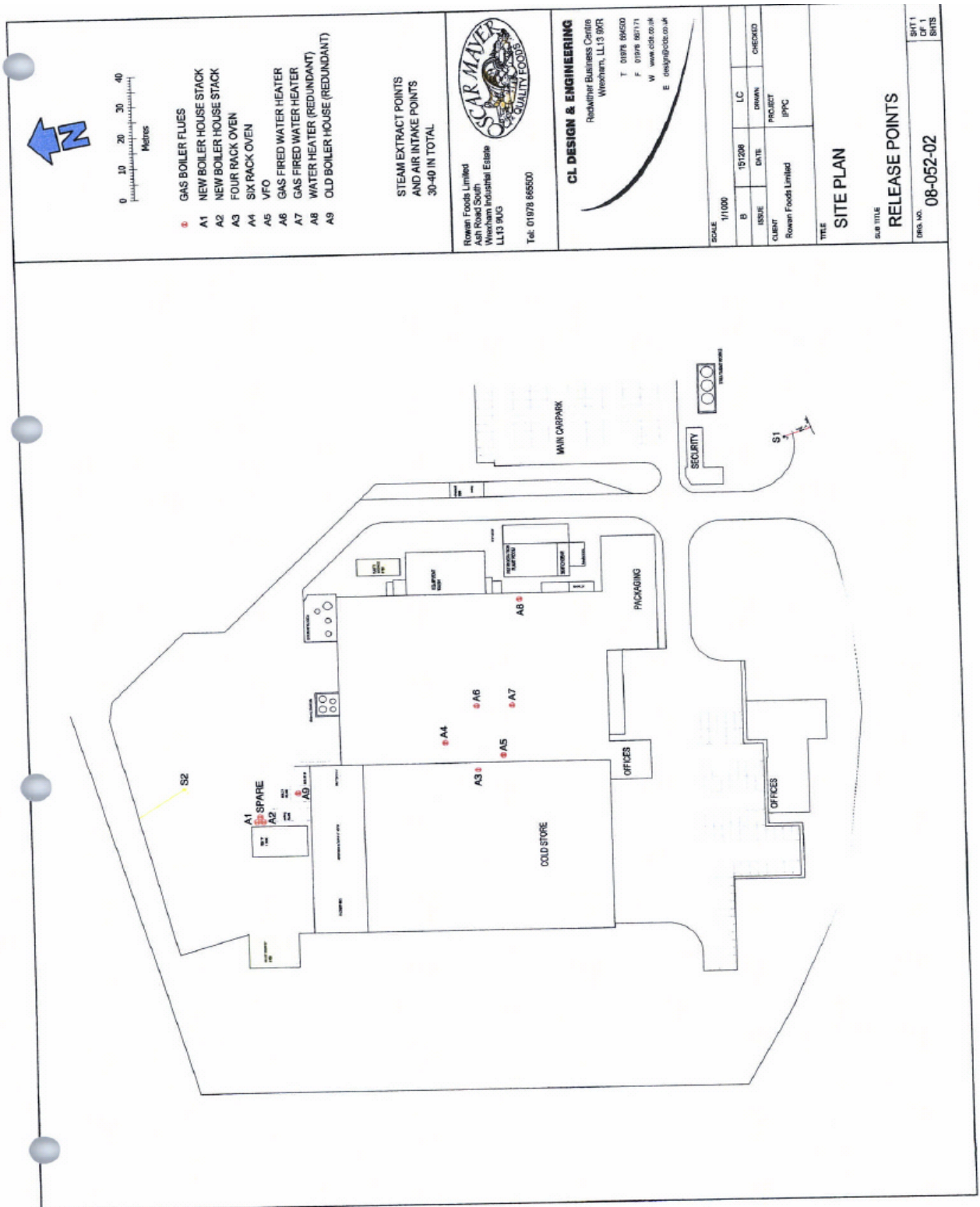
The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.

IP6	The operator shall revise the accident management plan and implement changes to procedures taking into account the permit requirements. A written report shall be provided to the Agency detailing any deficiencies identified, the improvements proposed and the time scale for implementation. You must implement the plan from the date of approval in writing by the Environment Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the report.	01/06/2010
IP7	The operator shall submit a written energy audit to the Environment Agency for approval. The audit must contain the results of a review of energy usage and the measures to comply with the requirements of How to comply with your environmental permit – Getting the basics right (EPR 1.00) and How to comply with your environmental permit The food and drink sector (EPR 6.10). Proposals for reduction in energy usage and the implementation of individual measures with timescales will be detailed in an Energy Efficiency plan. The Energy Efficiency plan shall be based on the guidance provided in the Horizontal Guidance note H2 - IPPC Energy Efficiency. You must implement the plan from the date of approval in writing by the Environment Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.	01/12/2010
IP8	The operator shall submit a written water audit to the Environment Agency for approval. The audit must contain the results of a review of water usage and the measures to comply with the requirements of How to comply with your environmental permit – Getting the basics right (EPR 1.00) and How to comply with your environmental permit The food and drink sector (EPR 6.10). Proposals for reduction in water usage and the implementation of individual measures with timescales will be detailed in a Water Efficiency plan. You must implement the plan from the date of approval in writing by the Environment Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.	01/12/2010
IP9	The Operator shall submit a written report to the Environment Agency for approval. The report shall Identify and provide justification for actions to be implemented to improve the performance of the Effluent treatment plant (ETP), taking into consideration indicative BAT requirements detailed in How to comply with your environmental permit The food and drink sector (EPR 6.10). The report will include assessment of the capacity and performance of the settlement tanks with focus on BAT and the requirement to meet the trade effluent discharge consent (DCWW consent reference 705207). Included in the report will be a plan for the implementation and timescales for the actions to be carried out. You must implement the plan from the date of approval in writing by the Environment Agency. The notification requirements of condition 2.4.2 will be deemed to have been complied with on submission of the plan.	01/06/2010

Schedule 2 - Site plan



Site Plan – Emission Release Points



Schedule 3 - Waste types, raw materials and fuels

Table S3.1 Raw materials and fuels

Raw materials and fuel description	Specification
Sodium Hydroxide (Caustic Soda) Solution	The maximum concentration of Mercury content in the Sodium Hydroxide (Caustic Soda) Solution is 0.03mg/l

Schedule 4 – Emissions and monitoring

Table S4.1 Point source emissions to air – emission limits and monitoring requirements

Emission point ref. & location	Parameter	Source	Limit (including unit)	Referen ce period	Monitorin g frequenc y	Monitoring standard or method
A1 (Site Plan Release Points – Schedule 2)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	Boiler Stack 1	No limit set	–	Annual	BS EN 14792
A2 (Site Plan Release Points – Schedule 2)	Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂)	Boiler Stack 2	No limit set	–	Annual	BS EN 14792
A3 (Site Plan Release Points – Schedule 2)	None	Oven 1 exhaust (4 rack oven)	No limit set	–	–	–
A4 (Site Plan Release Points – Schedule 2)	None	Oven 2 exhaust (6 rack oven)	No limit set	–	–	–
A5 (Site Plan Release Points – Schedule 2)	None	Oven exhaust (mobile oven)	No limit set	–	–	–

Table S4.8 Process monitoring requirements				
Emission point reference or source or description of point of measurement	Parameter	Monitoring frequency	Monitoring standard or method	Other specifications
S1 (Site Plan Release Points – Schedule 2)	COD	Monthly	BS 6068 2.34:1988 or SCA Blue Book 215	-
S1 (Site Plan Release Points – Schedule 2)	Suspended solids	Monthly	BS EN 872:2005 or SCA Blue Book 105 ISBN 011751957X	-
S1 (Site Plan Release Points – Schedule 2)	pH	Monthly	BS 6068-250:1995, ISO 10523:1994 or SCA Blue Book 14 ISBN 0117514284	-
S1 (Site Plan Release Points – Schedule 2)	Volume	Daily	Flow meter	-

Schedule 5 - Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

Table S5.1 Reporting of monitoring data			
Parameter	Emission or monitoring point/reference	Reporting period	Period begins
Emissions to air Parameters as required by condition 3.5.1.	A1, A2	Every 12 months	10/09/2009
Emissions to Sewer Parameters as required by condition 3.5.1	S1	Every 12 months	10/09/2009

Table S5.2: Annual production/treatment	
Parameter	Units
Ready Meal Production	tonnes

Table S5.3 Performance parameters

Parameter	Frequency of assessment	Units
Water usage	Annually	m ³
Energy usage	Annually	MWh
Waste produced	Annually	tonnes

Table S5.4 Reporting forms

Media/parameter	Reporting format	Date of form
Air	Form air 1 or other form as agreed in writing by the Agency	10/09/09
Sewer	Form sewer 1 or other form as agreed in writing by the Agency	10/09/09
Water usage	Form water usage1 or other form as agreed in writing by the Agency	10/09/09
Energy usage	Form energy 1 or other form as agreed in writing by the Agency	10/09/09

Schedule 6 - Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

Permit Number	EPR/WP3534GX
Name of operator	Oscar Mayer Limited (Trading as Rowan Foods)
Location of Facility	Wrexham Convenience foods (Rowan Foods), Ash Road South, Wrexham Industrial Estate, Wrexham, LL13 9UG.
Time and date of the detection	

(a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or fugitive emission which has caused, is causing or may cause significant pollution

To be notified within 24 hours of detection	
Date and time of the event	
Reference or description of the location of the event	
Description of where any release into the environment took place	
Substances(s) potentially released	
Best estimate of the quantity or rate of release of substances	
Measures taken, or intended to be taken, to stop any emission	
Description of the failure or accident.	

(b) Notification requirements for the breach of a limit

To be notified within 24 hours of detection unless otherwise specified below	
Emission point reference/ source	
Parameter(s)	
Limit	
Measured value and uncertainty	
Date and time of monitoring	
Measures taken, or intended to be taken, to stop the emission	

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period

(c) Notification requirements for the detection of any significant adverse environmental effect	
To be notified within 24 hours of detection	
Description of where the effect on the environment was detected	
Substances(s) detected	
Concentrations of substances detected	
Date of monitoring/sampling	

Part B - to be submitted as soon as practicable

Any more accurate information on the matters for notification under Part A.	
Measures taken, or intended to be taken, to prevent a recurrence of the incident	
Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission	
The dates of any unauthorised emissions from the facility in the preceding 24 months.	

Name*	
Post	
Signature	
Date	

* authorised to sign on behalf of **Oscar Mayer Limited (Trading as Rowan Foods Limited)**

Schedule 7 - Interpretation

"*accident*" means an accident that may result in pollution.

"*annually*" means once every year.

"*application*" means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

"*authorised officer*" means any person authorised by the Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

"*emissions to land*", includes emissions to groundwater.

"*EP Regulations*" means The Environmental Permitting (England and Wales) Regulations SI 2007 No.3538 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

"*fugitive emission*" means an emission to air, water or land from the activities from a localised or diffuse source which is not controlled by an emission or background concentration limit.

"*groundwater*" means all water, which is below the surface of the ground in the saturation zone and in direct contact with the ground or subsoil.

"*MCERTS*" means the Environment Agency's Monitoring Certification Scheme.

"*quarter*" means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

"*year*" means calendar year ending 31 December.

END OF PERMIT