Cyfoeth Naturiol Cymru
Natural Resources Wales

Natural Resources Wales Permitting Decisions

Kellogg Company of Great Britain Limited

Wrexham Breakfast Cereals

Decision Document

Application for a Normal Variation

The application number is: PAN-027445

The permit variation number is: EPRBV8016ID/V009

The operator is: Kellogg Company of Great Britain Limited

The Installation is located at: Wrexham Breakfast Cereals, Kellogg's, Bryn Lane Wrexham Industrial Estate, Wrexham, LL13 9UT

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the operator's proposals.

Contents

1. Executive summary

1.1. Application summary

This variation application proposes to make changes to emission points to air associated with changes to existing production processes, including a new coating line for rice products. The operator has applied for the installation of eleven new emission points to air and thirteen new pieces of equipment installed on the roof. Eleven of the current emission points to air will be removed. The annual capacity of the site will remain at 154,000 tonnes per year but daily maximum capacity will increase to 553 tonnes per day (from 408 tonnes per day). An application has also been made for a minor change to the site boundary, which will add a small portion of land to the site. Additional liquid malt raw materials will be required for the flavour system. These will be delivered in IBCs and stored inside the factory. No significant alterations are proposed to the waste water treatment plant (WWTP). The operator has also applied to reduce the frequency of monitoring for oxides of nitrogen (NOx) for the boilers at emission points A1 to A3 in accordance with the Medium Combustion Plant Directive (MCPD).

1.2. Our decision

We have decided to issue the variation for Wrexham Breakfast Cereals operated by Kellogg Company of Great Britain Limited. We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

2. Receipt of the application

The application was received on 11/11/2024**.** In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- An updated noise impact assessment following proposed repositioning of equipment.
- Confirmation that the site report will be updated
- An updated OPRA spreadsheet

A letter requesting this information was sent to the operator on 11/04/2025. Upon receipt of this information, on 30/04/2025, we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

3. Confidential information

The operator made no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

4. Legislation

The variation will be issued, under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an *installation* as described by the IED;
- a p*lant* as described in Schedule 25A covering the Medium Combustion Plant Directive (MCPD)
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation, a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.

As the EPR regulator for Part A1 installations in Wales, NRW are required to determine any duly made Part A1 permit applications. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals

against the detailed legal requirements of EPR. Our public participation statement[1] gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

5. Consultation

No consultation has been carried out on this application, as it is an application for a normal variation not subject to consultation requirements. This decision was made in accordance the Environment Permitting Regulations (EPR), our statutory Public Participation Statement[2] and our Regulatory Guidance.

6. Requests for information

Further information was requested during determination by way of a Schedule 5 Notice requiring the operator to provide further information relating to the air emissions risk assessment and the discharge to the effluent treatment plant. The Schedule 5 Notice was sent on 23/05/2025 and the operator's response to the Schedule 5 Notice was

[1] Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations

provided on 24/06/2025. The additional information supplied satisfied the requirements of the Schedule 5 Notice.

Informal information requests were also made via email. These related to the total thermal input of the installation and the operating hours of the boilers at A1 to A3.

A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received.

7. The Installation

7.1. The permitted activities

The regulated facility is currently an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- S6.8 A1(d)(ii) – Treatment and processing, other than exclusively packaging of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging) – only vegetable raw materials with a finished product production capacity greater than 300 tonnes per day
- S1.1 A1(a) – Burning any fuel in an appliance with a rated thermal input of 50 or more megawatts
- S5.4 A1 (a)(i) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving one or more of the following activities: (i) biological treatment.

An installation may also comprise “directly associated activities”, which at this Installation includes:

- Surface water drainage

Together, these listed and directly associated activities comprise the Installation.

7.2 Changes to the installation

The operator is proposing to make changes to and rename their existing manufacturing lines as detailed below:

Existing	Future
NBU	Process 1 – extrusion line
Bran / Corn	Process 2 – complex flakes
RDX	Process 3 – rice line
4th Process	Process 4 – corn line
Elevenses	Process 5 – coating line

This Variation will add eleven new emission points and remove eleven existing emission points to air. The new emission points to air and associated abatement are as follows:

- 125 (A35) Process 5 Wet dust collection system serving process and packing
- 126 (A36) Process 3 Wet dust collection system serving temperers
- 127(A37) Process 3 Wet dust collection system serving coating dryer
- 128 (A38) Process 3 Wet dust collection system serving transfer lines
- 129 (A39) Process 3 Wet dust collection system serving coating dryer
- 130 (A40) Process 3 Dry dust collector serving big bag area
- 131 (A41) Process 3 Dry dust collector serving flour transport
- 132 (A42) Process 3 Dry dust collector serving salt and flour receivers
- 133 (A43) Process 3 Cyclone serving jet zone cooler
- 134 (A44) Syrup Centre No 1 Bag filter
- 135 (A45) Syrup Centre No 2 Bag filter

There will be no new emission points to air associated with Process 1, 2 and 4. Following the changes Process 3 will produce rice products and will include a coating line. There will be eight new emission points to air associated with Process 3. For Process 5, this area will be fully refurbished and new wet dust extraction and air handling units will be installed. This will result in the addition of one new emission point to air. A second syrup system will be installed as part of these changes to serve processes 2, 3 & 5. This will be adjacent to the existing syrup centre. There will be a

new emission point to air associated with the new syrup system, A135. Emission point A134 is linked to the existing syrup centre. There will be thirteen new pieces of equipment installed on the roof. These are summarised in Section 10.6. below in the assessment of noise and vibration.

The installation has a Section 1.1 A(1)(a) activity for operating a combustion facility with a combined thermal input of 70.9 MW. The existing combustion plant listed in Schedule 1 of the permit includes four boilers, fuelled on natural gas, and a number of dryers and ovens. There will be no changes to the site's boilers, which are existing medium combustion plant (MCP).

There will be changes to some of the product dryers (which are excluded from MCPD) Kellogg's operate on site. These are as follows:

- The Cooked Product Dryer, the All Bran Plant Dryer, and the Coating Dryer will be removed
- The Bran Flakes Plant will be renamed Process 2 Jet Zone
- The RDX Plant will be renamed Process 3 Jet Zone
- The Base Dryer will be renamed Process 1 Base Dryer
- Process 5 Coating Dryer and Process 3 Coating Dryer will be added to the permit.

Following the variation the combined thermal input will decrease to 68MW (from 70.9 MW). The four existing gas fired boilers which are existing medium combustion plant (MCP) have a rated thermal input between 5 and <50 MW. As the compliance deadline for these four existing MCP's was 1 January 2025, we will incorporate the requirements of Schedule 25A for these MCP's by way of this variation application.

Additional liquid raw materials and new refrigerant room cooling systems will be required following the variation. No significant alterations are proposed to the waste water treatment plant (WWTP). Emissions to sewer will be within currently permitted and assessed limits.

An Improvement Condition was added to the permit in 2022 following the Food and Drink BREF review to confirm the site's maximum capacity in order to control capacity creep. During this determination the operator confirmed that the existing capacity is 553 tonnes/day. The previous permit did not set a limit on capacity in Schedule 1 of the permit, it made reference to Improvement Condition (IC) 10. Therefore, in line with information received as part of this application, we have set a limit of 553 tonnes/day. This permit variation also sets a limit of 154,000 tonnes per year, whereas the previous permit set no limit. IC10 has been completed.

8. Operation of the Installation

8.1. Operator competence

The operator is the sole operator of the Installation. We are satisfied that the operator is the person who will have control over the operation of the Installation after the variation is issued; and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator[3].

Relevant Convictions

The operator has declared they have no relevant convictions. NRW's COLINS Database has been checked to confirm there are no relevant convictions. No relevant convictions were found.

Financial Provision

The operator has declared they have no current or past bankruptcy or insolvency proceeding against them. There is no known reason to consider that the operator will not be financially able to comply with the permit. The decision was taken in accordance with RGN 5 on Operator Competence.

8.2. Environmental Management System

The operator has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our "How

[3] RGN 1 Understanding the meaning of 'operator' (naturalresources.wales)

to comply with your environmental permit" guidance[4] The site operates under an environmental management system which is their own management system.

The operator has confirmed that it is committed to managing and continually improving environmental performance and that the existing EMS, which covers all existing site operations and change management, will be updated to reflect the proposed changes on site.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

Accident management

The EMS includes an Accident Management Plan of which a summary has been submitted as part of this application. The operator has stated that the site's Accident Management Plan will be updated and implemented to ensure that risks associated with the revisions to existing process lines and replacement process lines is considered and mitigation measures applied to reduce the risk of accidents from operation of the production lines. We have requested by way of an Improvement Condition that the Accident Management Plan is to be updated and submitted to NRW for approval – see Section 12.3 and Annex I below.

In order to ensure that the management system proposed by the operator sufficiently manages the residual risk of accidents, permit condition 1.1.1a requires the implementation of a written management system which addresses the pollution risks associated with, amongst other things, accidents.

8.3. Operating techniques

Installation activities and assessment of Best Available Techniques

The operator has described the proposed equipment and operating techniques and compared these against the relevant guidance notes and Best Available Techniques conclusions (BATc) which for an installation of this type is:

[4] Natural Resources Wales / Guidance to help you comply with your environmental permit

- BAT Reference Document for Food, Drink and Milk Industries (December 2019);
- How to comply with your environmental permit. Additional guidance for The Food and Drink Sector (October 2014);
- Monitoring stack emissions: environmental permits (March 2024).

The Operator has confirmed it will comply with the appropriate Technical Guidance Notes and Best Available Techniques conclusions (BATc). We have reviewed the techniques proposed and consider them to represent BAT at this installation and meet the requirements outlined in the BATc .

We have specified that the operator must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques (Table S1.2) table in the permit and will include the following reports:

- Management and Operating Techniques
- Non Conformity, Corrective and Preventative Action Procedure
- Odour Procedure
- Noise Procedure
- Preventative Maintenance Schedule
- Site Spillage Procedure
- Site Sustainability Plan

We have also specified the operating techniques should include the updated Accident Management Plan and Noise Management Pan required by Improvement Condition 12 and 13.

The permit will specify that the four existing MCPs must adhere to operating techniques specific for MCP as detailed in Schedule 1, Table 1.2A.

Efficient use of raw materials, water and energy

The operator has confirmed it is committed to managing and continually improving environmental performance and energy efficiency across the Site. Energy efficiency is

considered regularly at the facility. The facility produces environmental reports in which energy usage is compared against targets and where there are any anomalies in relation to notable increases in energy use these will be investigated and measures put in place to improve energy consumption, as appropriate. Energy saving opportunity schemes are undertaken every 4 years; the assessments identify energy efficiency improvement opportunities which are considered by the facility for implementation. The new systems will be designed and optimized to minimise water consumption on site.

Having considered the information submitted in the application, we are satisfied that the operator will ensure that raw materials, water and energy is used as efficiently as possible.

The operator will be required to report energy usage under condition 4.2 and Schedule 4 of the permit. The following parameters are required to be reported: water and energy usage. This will enable us to monitor energy recovery efficiency at the Installation.

9.The site

9.1. Site Plan

The operator proposes a minor change to the boundary as part of this application. The operator has provided an updated plan which we consider is satisfactory, showing the new extent of the site of the facility and its new and existing emission points. The updated plan will be included in the permit (Schedule 7) and the operator will be required to carry on the permitted activities within the site boundary. In accordance with our Horizonal Guidance, H5 the operator does not intend to make a substantial change in their operations, and we have therefore not requested baseline data within an SCR as part of the application for a variation to their permit.

9.2. Site protection: potentially polluting substances and prevention measures.

The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14(1)(e) and 16(2) of the IED.

The additional liquid malt raw materials will be delivered in IBCs and stored inside the factory. Any spill would be contained within the enclosed factory where there are no surface water drains. The operator has confirmed that there are a number of control measures already in place on site to minimise the impact of an environmental accident on site – e.g. liquids stored in bunded areas, drains in the delivery areas being directed to the on-site effluent treatment plant not surface water, maintenance and regular site audits.

As stated in Section 8.2 above, the operator has confirmed that the site's Accident Management Plan will be updated following the variation and we have specified this must be provided and approved in accordance with improvement conditions imposed as part of this variations.

Based upon the information in the application, and by inclusion of conditions in the permit, we are satisfied appropriate measures will be in place to protect the site and its surroundings from polluting substances.

10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during are determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the operator has provided an environmental risk assessment with the application which identifies and the sources of key risks from the variation, possible pathways and receptors. This risk assessment and further assessments

provided by the operator and/or completed by NRW will be discussed in further detail below.

10.1. Assessment of impact on air quality

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the stack and its impact on local air quality.

The operator has assessed the changes in the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health in line with relevant guidance[5]. These assessments predict the potential effects on local air quality from the Installation's stack emission. The scope of the assessment is limited to consideration of pollutant releases of particulate matter (PM10 and PM2.5) The proposed changes will result in a reduction in the sites combustion activities and it is therefore considered unnecessary to assess emissions of other substances, such as nitrogen dioxide (NO_X).

The air impact assessments, and the dispersion modelling have been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e., the maximum permitted emission rate. We are in agreement with this approach.

The assumptions underpinning the model have been checked and are reasonably precautionary. The output from the model has then been used to inform further assessment of health impacts. The operator has calculated process contributions (PC) and predicted environmental concentrations (PEC) at locations within the immediate vicinity and all identified sensitive receptor locations. The modelling results for each pollutant will be discussed separately below

Predicted emissions of PM_{10} was assessed against a long-term critical level of 40µg/m^3 (annual) and short term critical level of 50µg/m^3(24-hour mean). At all sensitive receptor locations modelled, the air quality assessment level is not exceeded

[5] Air emissions risk assessment for your environmental permit - GOV.UK (www.gov.uk)

at any of the receptor locations. Therefore, in accordance with the relevant GOV.UK Guidance[6], the long-term and short term impacts from PM_{10} can be considered not significant.

Predicted emissions of $PM_{2.5}$ was assessed against a long-term critical level of 20µg/m^3 (annual). At all sensitive receptor locations the air quality assessment level is not exceeded at any of the receptor locations. Therefore, in accordance with the relevant GOV.UK Guidance the long-term impacts from $PM_{2.5}$ can be considered as not significant.

Emission limits

We have added new emission limits to emission points A1-A4, the existing MCP's. A limit of 200 mg/Nm^3 for oxides of nitrogen has been added to all of the MCPs in accordance with the limits set out in MCP for existing MCP between 5 – 50MWth which are 'other engines' (as defined in the directive). There are no ELV'S set for Carbon Monoxide (CO) however there is a requirement for CO to be monitored.

Based on the information in the application we have decided not to impose emission limits for particulate matter at emission points A35 to A45.

It is considered that the emission limit values or technical measures described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured.

Based upon the information in the application and the measures that will be imposed by the permit we are satisfied that the appropriate measures will be in place to protect air quality for the environment and human health.

10.2. Assessment of impact to surface and ground water

The proposal does not include a direct discharge to surface water. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

10.3. Emissions to sewer

Effluent from the cleaning processes is treated at the onsite effluent treatment plant, prior to discharge to the foul sewer under a Trade Effluent Consent from Welsh Water.

With the introduction of new coated products it is predicted that the concentration of the influent to the effluent treatment plant will be higher than existing. However, the existing WWTP has the capacity to deal with this as shown below:

	Trade Effluent Consent Limits	Average Result for 2024	Average Anticipated Result
COD	2500 mg/l	68 mg/l	1000 mg/l
SS	600 mg/l	33 mg/l	150 mg/l
Flow	1200 m^3 in 24 hours	468 m^3/ day	650 m3 / day

Emissions to sewer will be within currently permitted and assessed limits. There will be no changes to the existing site drainage systems as a result of the proposed changes.

10.4. Fugitive emissions

The operator has identified the following potential fugitive emissions in their environmental risk assessment:

- Dust
- Pests
- Mud and litter

The application details measures which will be in place for preventing and minimising fugitive emissions. The main sources of dust from activities at the site are from dry raw

material receipt and production activities. Raw materials are stored within silos, tanks, or within a building. Dust generated from these sources is captured, extracted and treated by bag filters prior to discharge to atmosphere. Regular, visual inspection of all areas of the site and site boundary are carried out by site personnel. The site has a policy of keeping all doors, windows and louvers closed at all times, this is facilitated by automatic closing mechanism whenever possible. Regular awareness training is also provided to all site personnel of such potential hazard.

The operator has confirmed that it has existing pest control arrangements on site which will be continued following the proposed changes to the process lines.
The risk of litter migrating outside the inner perimeter of the plant is controlled by means of a site inspection and cleaning regime and also monthly environmental site audits.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

10.5. Assessment of odour impact

There are sensitive receptors within the vicinity of the installation which include commercial, agricultural, residential, and recreational receptors. The operator has identified the following sources of odour in their environmental risk assessment:

- raw material receipt and storage
- conveying and preparation of raw materials

The operator details measures which will be in place for preventing and minimising odour pollution. The operator has confirmed that the factory buildings are completely enclosed with all manufacturing located within the confines of a building and all raw materials are stored within silos and tanks, or internally within bags in the factory.

The operator has also submitted an Odour Management Plan (OMP) ("Odour Procedure") which details various measures to minimize and mitigate odour issues. The Plan is subject to regular review and updates in accordance with the EMS and the permit.

We have compared the measures proposed to minimise odour at for the site to the relevant BAT standards and are satisfied the techniques represent appropriate measures for the installation.
The Odour Procedure will be incorporated into the operating techniques section of the permit. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of odour.

Condition 3.3.1 in the permit will also require that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the operator for minimising odour at the installation.

10.6. Noise and vibration assessment

There are sensitive receptors within the vicinity of the installation which include commercial, agricultural, residential, and recreational receptors. The operator has stated that there will be 13 new pieces of equipment installed on the roof, these are summarised below:

- 125 (N-125) Process 5 Wet dust collection system serving process and packing
- 126 (N-126) Process 3 Wet dust collection system serving temperers
- 127 (N-127) Process 3 Wet dust collection system serving coating dryer
- 128 (N-128) Process 3 Wet dust collection system serving transfer lines
- 129 Process 3 Wet dust collection system serving coating dryer
- 130 (N-129) Process 3 Dry dust collector serving big bag area
- 131 (N-130) Process 3 Dry dust collector serving flour transport
- 132 (N131) Process 3 Dry dust collector serving salt and flour receivers
- 133 (N132) Process 3 Cyclone serving jet zone cooler
- N-01 Process 5 New AHU Process

- N-02 Process 5 New AHU Packing
- N-03 Process 5 New AHU Locker Area
- N-04 Process 5 New AHU Coating Dryer
- N-05 Process 3 New AHU Coating Dryer

Due to the potential for the new plant to increase noise levels in the area a Noise Impact Assessment has been undertaken. The Noise Impact Assessment was carried out in accordance with the criteria and reporting requirements of the British Standard for noise assessment BS 4142 and the supporting method implementation document. The assessment concludes that it is considered unlikely that the proposed variation will cause a noise impact on the nearest noise sensitive receptors. The noise impact assessment has been reviewed by Natural Resources Wales modelling specialists to establish it's robustness and confirms there is no reason to conclude that impacts from noise originating from the site at identified noise sensitive receptors will be subject to change following implementation of the proposed variation. There is no history of noise complaints at the site.

The application details measures which will be in place for preventing and minimising noise and/or vibration and the operator has submitted a Noise Management Plan (NMP) which details various measures to minimize and mitigate noise issues.

The Noise Management Plan (NMP) is subject to regular review and updates in accordance with the EMS and the permit. The Plan incorporates noise control measures and requirements for noise monitoring. The Plan also identifies potential sources of noise at the facility, the current noise management measures in place, possible noise control measures should noise issues be identified, and details of timescales and/or review of the control measures in place. The operator has confirmed that the factory buildings are completely enclosed with all manufacturing located within the confines of the building and that the Noise Management Plan will be reviewed and updated to incorporate the change in equipment prior to when they are brought online. We have specified this must be provided and approved in accordance with improvement conditions imposed as part of this variation -see Annex I below.

The Noise Procedure will be incorporated into the operating techniques section of the permit. We have compared the measures proposed to minimise noise at for the site to the relevant BAT standards and the relevant guidance for noise and vibration management and are satisfied the techniques represent appropriate measures for the installation.

We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the activity means that there are no significant sources of vibration on site. Therefore, vibration does not need to be included in the management plan.

Conditions 3.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the operator for minimising noise at the installation.

11. Impact on National Site Network Sites, SSSIs and non-statutory sites

The operator has used the relevant screening distance criteria to identify relevant protected conservation sites which could be at risk from the proposal. The screening distances used are 10km for Special Areas of Conservation (SAC), Special Protection Areas and Ramsar sites, and 2km for Sites of Special Scientific Interest, National Nature Reserves, Local Wildlife Sites (LWS) and Ancient Woodland (AW) We are in agreement with the screening distances used.

A full assessment of the variation application and its potential to affect the identified sites has been carried out as part of the permit determination process. National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

11.1 The National Site Network

The following National Site Network sites are located within 10 km of the installation:

- River Dee and Bala Lake Special Area of Conservation (SAC) – 3km east;
- Midland Meres & Mosses Phase 2 Ramsar – 4km northwest; and
- Johnstown Newt Sites SAC – 8km southwest.

A Habitats Regulations Assessment (HRA) is not required because there is no conceivable impact pathway to any of the National Site Network sites identified by virtue of the scale or location or nature of the project.

As the nearest European site is approximately 3km from the installation, there is no impact pathway from dust emissions which are which typically impact receptors within close proximity to a site (less than 1km).

As discussed in section 10.1 following the variation the combined thermal input will decrease and therefore the proposed changes to the sites combustion arrangement are considered to represent a betterment and so there is no impact pathway from any emissions to air such as nitrogen dioxide (NO_X).

11.2 Sites of Special Scientific Interest (SSSI)

No SSSIs are located within 2 km of the installation. Therefore, no further assessment was required as there is no impact pathway to any SSSI due to the location of the installation.

11.3 Non-statutory conservation sites

The following relevant non-statutory sites re located within 2 km of the installation:

- Five areas of ancient woodland located within 2km of the Site. The closest of these is located approximately 1km to the southwest of the Site.

With regards to dust emissions, as above for the National Site Network, there is no impact pathway. There is no possibility that dust from the facility could negatively affect any non-statutory conservation site stated above due to distance from the installation to the sites.

Based upon the information in the application we are satisfied that there will be no adverse impact to the non-statutory conservation sites identified.

12 .The Permit Conditions

12.1 Incorporating the application / variation

We have specified that the operator must operate the permit in accordance with descriptions in the application, including additional information received as part of the determination process. These descriptions have been specified in the Operating Techniques table in the permit. We have specified that the operator must operate the permit in accordance with descriptions in the application.

12.2. Medium Combustion Plant Conditions, Limits, Monitoring and Reporting

We have incorporated a number of new conditions and operating techniques specific to MCPs into the permit. These conditions have been taken from our MCP permit template.

As discussed in section 10.1 we have set new limits on the existing MCP's in line with the MCPD.

The boiler at emission point A4 will be monitored every six months for oxides of nitrogen in line with the monitoring requirements of BS EN14792, as per the current permit.

The existing permit requires boilers at emission points A1 to A3 to be monitored every 6 months. The applicant has requested that this be reduced to every 3 years in accordance with the requirements of MCPD. This is in principle back sliding of permit

conditions. We have reviewed the reasoning behind the 6 month monitoring requirements and found the frequency was specified as a result of in-combination impacts of nitrogen and sulphur deposition on Midlands Meres and Mosses RAMSAR. However, the site was only found to be contributing 0.27% of the overall deposition at the site and the monitoring frequency was specified in order to ensure there was no increase in emissions over time. As discussed, the overall thermal input of the site will be decreasing as a result of changes to various driers on the site (excluded MCP). This is expected to result in lower emissions of nitrogen and sulphur, thereby reducing the overall environmental impact. The monitoring frequency of the main boiler (A4) will remain as 6 months and the permit will introduce emission limits for all boilers where there we previously none. For these reasons we consider the request to reduce to monitoring frequency of emission points A1 – A3 to 3 years in accordance with MCPD reasonable in this instance. Monitoring will need to be in accordance with BS EN14792 as per the current permit.

The variation will impose requirements to monitor CO in line with MCPD requirements. The permit will specify CO should be monitored every 3 years for emission points A1-4 in accordance with Monitoring stack emissions: low risk MCPs and specified generators - GOV.UK.

12.3. Improvement conditions

Based on the information on the application, we consider that we need to impose improvement conditions. Details of the improvement conditions used can be found at Annex 1. The inclusion of the improvement conditions has been discussed throughout the body of the text of this decision document.

13. OPRA

The OPRA score has not been changed as a result of this variation and remains as 98. This will form the basis for ongoing subsistence fee's.

ANNEX 1: Improvement Conditions

The following table for the improvement conditions has been included in the permit and the decision for their inclusion discussed in the body of the text of this document:

Table S1.3 Improvement programme requirements		
Reference	**Requirement**	**Date**
IC12	The operator shall update its accident management plan to incorporate all the activities covered by this permit. The operator shall submit the accident management plan to Natural Resources Wales for approval by the date specified.	Within 6 months of the issue of Variation V009 or otherwise agreed in writing with NRW.
IC13	The operator shall update its noise management plan and in accordance with Guidance: Noise and vibration management: environmental permits - GOV.UK	Within 6 months of the issue of Variation V009 or otherwise agreed in writing with NRW.