

**SUPPORTING INFORMATION IN RESPECT OF
APPLICATION TO VARY
ENVIRONMENTAL PERMIT REF UP3237CP**

**R F BROOKES LTD,ROGERSTONE PARK
(SOLWAY FOODS LTD)**

June 2015

**SUPPORTING INFORMATION IN RESPECT TO VARY
ENVIRONMENTAL PERMIT REFERENCE UP3237CP**

R F BROOKES LTD, ROGERSTONE PARK (SOLWAY FOODS LTD)

TABLE OF CONTENTS

Section	Page
NON-TECHNICAL SUMMARY	i
1. INTRODUCTION	1
2. DESCRIPTION OF PROPOSED CHANGES	3
3. MANAGEMENT ARRANGEMENTS	4
4. APPLICATION SITE CONDITION REPORT	5
5. EMISSIONS TO THE ENVIRONMENT	6
6. OPERATIONS	9
7. MONITORING ARRANGEMENTS	13
8. RESOURCE EFFICIENCY AND CLIMATE CHANGE	14
9. MEASURES TO IDENTIFY, ASSESS AND MINIMISE THE ENVIRONMENTAL RISKS AND HAZARDS OF ACCIDENTS AND THEIR CONSEQUENCES	15
10. CESSATION OF ACTIVITIES AT THE INSTALLATION	16
11. INCREASE BOUNDARY OF THE INSTALLATION	16
APPENDICES	
APPENDIX 1	Installation Location Maps
APPENDIX 2	Plan Indicating Installation Boundary
APPENDIX 3	Site Plan Indicating Location of Additional Activities
APPENDIX 5	Process Flow Diagram for Additional Activities
APPENDIX 6	H1 Assessment of Additional Releases to Air
APPENDIX 7	H1 Annex A Assessment
APPENDIX 8	Copy of Climate Change Levy Agreement (Underlying: Showing Targets)
APPENDIX 9	ISO14001 First stage audit confirmation
APPENDIX 10	Land Registry Document.

SUPPORTING INFORMATION IN RESPECT TO VARY ENVIRONMENTAL PERMIT REFERENCE UP3237CP

R F BROOKES LTD, ROGERSTONE PARK (SOLWAY FOODS LTD)

0. NON-TECHNICAL SUMMARY

A Permit variation is being submitted to cover an additional production area that is being added to the factory at Rogerstone Park. Currently, the Installation produces and supplies approximately 24,500 tonnes of chilled and frozen foods annually. The total site production capacity is approximately 120 tonnes per day and is therefore listed under Section 6.8 Part A(1)(d)(i) "Treating and processing material intended for the production of food products from animal raw materials (other than milk) at plant with finished production capacity of more than 75 tonnes per day".

The new area will house and produce our customer category specific products. The processes will involve battered chicken products and condiments. The buildings are set within an existing area (built with the original factory and named 'the expansion zone') with just small extension to the original footprint of 450m². The production areas will contain two thermal oil boilers to fire two fryers. There will be one rice cooking process, three impingement chilling lines, two packing lines, and five supplementary fridges.

The production capacity of this area will be 1000kgs/hour (500kg each line); 16 tonnes per day. The production time is limited as an 8 hour window must be given in accordance with relevant food and customer requirements. Therefore the maximum capacity of the new line will be 5,840 tonnes per year (assuming unlikely scenario of 365 working).

It is considered that all new activities are within the existing installation boundary. The area upon which the new production area will be located is already developed; in that the ground was covered with paving and/or hardcore.

There will be 2 emission points to air; directly from the thermal oil boilers; discharging thermal oil emissions through a stack. The stack is 12 metres in height, but less than 3 metres above the nearest roof level. The only parameters expected from these additional emissions are associated with the combustion of thermal oil gas; low levels of Nitrogen Dioxide and Carbon Monoxide.

The new area will be serviced by the existing effluent drainage system which is a closed system leading directly to our onsite effluent treatment plant ("ETP"). No additional effluent treatment capacity is required. The site point source release to sewer (S1 existing Permit) will remain unchanged. All site emissions via S1 are covered by the Trade Effluent Discharge Consent provided by Welsh Water. Welsh Water have recently agreed to increase the discharge volume from the site, so the planned increase in production is serviced by this increase.

There will be no emissions to surface water drains from the new area (closed buildings, no surface water drainage). Roof rainwater will be discharged to the current system. The existing surface water drainage system within the general area will remain unchanged.

The new area will have chilled capabilities. No additional ammonia plant capacity is required to facilitate this; the existing refrigeration plant will remain unchanged. There will not be any additional charging of ammonia within the existing plant.

Some additional water (ingredient water and production of waste effluent in cleaning) and food safe cleaning chemicals will be utilised within the new area. A calculation of additional chemicals and their subsequent loading within the effluent stream has been undertaken. The additional levels have been calculated as insignificant on the current S1 site discharge.

To accord with the current waste arrangements of the rest of factory; designated internal recycling areas will be provided within the new areas. These will be waste collection points and not waste areas. Waste prevention measures currently in place will be applied foremost. Where waste is produced, food waste will be segregated at source (lines) to feed directly into the offsite Anaerobic Digestion Plant ("AD") arrangements – Note there is future plans to reinstate the previous on site AD facility. There will be no additional external waste storage or handling areas associated with the new area. All waste movements will remain through the existing system – through loading bays (Recycling Centre – located externally).

There will not be a significant increase to site vehicle activity due to the proposed activities. There is a relatively small overall increase in raw materials to the site (ingredients will be largely as utilised in other food lines in the factory. Additional packaging materials will be used). It is estimated the outward existing vehicle fleet owned by the customer(s) will remain unchanged.

The thermal oil boiler will sit outside the current building; this is due to safety concerns in mounting the boiler within the factory fabric.

There will be some external waste food oil storage associated with the fryers. The size of the tank will be in excess of 1000 litres and will be appropriately bunded.

No other relevant raw materials will be stored externally. They will be brought into the building via the existing goods in system (through the delivery plinth).

**SUPPORTING INFORMATION IN RESPECT OF APPLICATION TO
VARY
ENVIRONMENTAL PERMIT REFERENCE UP3237CP**

R F BROOKES LTD, ROGERSTONE (SOLWAY FOODS LTD)

1. INTRODUCTION

1.1. Overview

This Application is made in support of an additional purpose built area that is being added to the RF Brookes site in Rogerstone Park, Newport, South Wales. The area will house a product specific new production line. The building housing is largely within the site existing 'expansion zone', a purpose built shell that was created with the original building to allow for increase to production such as this. Some additional building works are required to increase footprint by 450m².

This application will just cover the new areas and the proposed additional activities. All further relevant information was submitted with the original Permit Application. No changes to current Installation boundaries are proposed at this stage.

Throughout the document, these activities and the buildings, will be referred to as the "new area" or "proposed activities".

1.2. Installation Location

Please refer to Appendix 1 of this document for a plan indicating the Installation Location. A further plan is included in Appendix 2 indicating the Installation Boundary (green) and Land Boundary (blue). The new area is located to the south of the existing building.

1.3. Purpose and Scope of Application for Variation

1.3.1. Existing Arrangements

Currently the site is listed under Section 6.8 Part A(1)(d)(i) "Treating and processing material intended for the production of food products from animal raw materials (other than milk) at plant with finished production capacity of more than 75 tonnes per day".

In addition; the site has an Effluent Treatment Plant ("ETP") which is listed under Section 5.3 Part A(1) (c) (ii) "Disposal of non-hazardous waste in a facility with a capacity of more than 50 tonnes per day by physio-chemical treatment".

There are seven point source emissions to air from the thermal oxidisers and natural gas boilers and combustion plant on site which provide steam and primary heat to process. The combined thermal capacity of boilers and combustion plant is ca. 28 MW. Nitrogen oxides, carbon monoxide and carbon dioxide are all released to air. In 2013 an additional release point (A7) was added which does not have thermal capacity but is required for periodic monitoring within the existing schedule. These existing releases have been assessed as insignificant following the use of the Agency's H1 screening tool.

The Installation is within 10 km of the River Usk / Afon Wysg SAC Severn Estuary SPA. There are residential properties to the east and southeast of the Installation.

1.3.2. Proposed Changes

A plan is provided (Appendix 3) which indicates the part of the Installation where additional activities will be undertaken. Note – the additional area is annotated as "Project Infill" on the plan and is coloured yellow.

The additional activities will not affect the current categorisation or listing under the Pollution Prevention and Control (England and Wales) Regulations 2000. The following application information is intended to provide Natural Resources Wales with enough information to assess whether proposed activities require additional conditions within existing Permit.

2. DESCRIPTION OF PROPOSED CHANGES

2.1. Overview

A process flow diagram is included in Appendix 5. This illustrates the stages of the proposed new activities. Please note that all activities will be undertaken within the area discussed in the overview.

2.2. Choice of Technology

The equipment is specified for the customer for whom the product is made. The fryers are state of the art within the food industry. The rice cooking process will mirror an existing successful process in our inline kitchens (Low Risk).

The fryers will be fired by thermal oil boilers. The emissions from the fryers will be discharged to atmosphere via two odour abatement units (UV-C). These units are energy efficient and proven within the industry – project engineers from RF Brookes visited other similar processes to assess the effectiveness of the odour abatement for this type of cooking.

The equipment and associated activities (storing, mixing, cooking, product transfer, chilling and packing) is undertaken in accordance with customer requirements.

The final commissioning of all equipment/lines must pass strict customer protocols prior to operation.

2.3. Relevant BAT Requirements

All sections laid out within Sector Technical Guidance Note EPR 6.10; The Food and Drink Sector – have been addressed within this document. Where relevant, the relevant sections of “How to Comply with Your Environmental Permit” that are addressed are cross referenced also within this document.

3. MANAGEMENT ARRANGEMENTS

3.1. Overview of Management System Arrangements

The site has an externally certified written Environmental Management System. The system is given appropriate financial resource and environmental considerations are foremost in site business decisions. An example of this is area specific environmental KPIs for Senior Management.

The EMS reflects the existing Permit requirement to identify and minimise risk of pollution, have a system for addressing non-conformances and incidents, and addressing complaints.

In addition to the externally certified and audited EMS, specific stringent management systems are in place across the site. These are often customer driven and are externally audited. Examples of this are technical control, health and safety, and hygiene written systems. These systems control composition of food products and the types of cleaning chemicals and frequency for example.

3.2. Environmental Policy

There is in place a site specific Environmental Policy. This is in accordance with the externally certified Management System. The policy contains a commitment to pollution prevention, specific improvement objectives and a commitment to continuous improvement.

3.3. Environmental Management System

The EMS in place at the site is ISO14001 – at current stage of Permit application, the site had passed first stage and was awaiting second stage audit. All processes and management practices within the new area will be measured and monitored and controlled through the procedures outlined within the existing EMS.

Training of staff for the new area will be in accordance with current environmental training. Evidence of staff training is retained and updated annually, or sooner if a new process or activity is introduced.

The site has an existing system of recording, investigating and reporting any incidents relevant to environmental risks. The new area and processes will be added to the system and additional risk assessments undertaken where relevant.

The current EMS scores Band 'A' on the OPRA scoring system, and is therefore considered BAT. An annual summary of the site EMS is included in Appendix 9. This is provided in evidence that the system is appropriate to the scale and nature (risks) of activities.

4. APPLICATION SITE CONDITION REPORT

A Site Condition Report was submitted with the original Permit Application. The proposed additional activities will take place within an area of land that was developed at the time of the SCR. The ground was developed, concreted and or/covered in hardstanding, and a sealed drainage system was installed into the area.

No further additions have been made to ground. The original SCR is still relevant; therefore, no additional information is supplied.

5. EMISSIONS TO THE ENVIRONMENT

5.1. Emissions to Air

5.1.1. Additional Foreseeable Emissions to Air

Point source emissions to air shall be expected from (newly designated) stack A8. The stack will contain the products of natural gas combustion. These products meet the benchmark values for point source emissions to air listed in Annex 1 of PGN EPR6.10.

5.1.2. Assessment of Additional Foreseeable Emissions to Air

In accordance with Agency Horizontal Guidance, A H1 assessment has been undertaken to assess the releases from the above emission points. The H1 assessment is very strict in its criteria. To undertake the assessment some assumptions had to be made due to lack of exact data (precise data a problem due to age of machinery). Therefore, some worst case scenarios have been applied throughout the assessment from manufacturers specifications. In addition, the effective stack height is registering as '0' due to the shape of the roof (stack is below height of adjacent elevated roof area). The stack is actually 1.5m above roof height within the area. The 0 factor registers as if the emissions are being dispersed at ground level (certainly not the case). Note – at the time of Permit application, the final stack height is yet to be decided. It is certain that the effective stack height will be 0 however.

The fryers are a low energy unit at – approx 38 kWh per hour, per fryer.

There are no Air Quality Standards related to substances released from the activities. The H1 has determined that the results exceed the short term PC for NO_x, but the environmental predicted concentration does not breach any local AQS in place.

Based on the results of the assessment, detailed modelling is not proposed due to the above known factors. A copy of the assessment is provided in Appendix 6.

5.1.3. Potential additional Fugitive Emissions to Air

There will be extra chilling facilities within the new area. Management of refrigerants (mostly ammonia) will be undertaken in accordance with current controls (as submitted in original application). All plant is subject to an electronic planned preventative maintenance ("PPM") system to inspect joints, shaft seals and gaskets. The ammonia plant has a sophisticated leak detection system.

Odour – The proposed additional activities will be undertaken in a closed food production area. Appropriate measures will be undertaken with current site controls, relating to the receipt, storage and handling of materials. The assessment of odour from the new activities has been carefully considered as it is recognised that frying is potentially an odorous activity. The project has identified a low carbon solution to the abatement challenge.

All relevant fugitive emissions to air are addressed in Annex A of the H1 Screening tool. A copy of this is included in Appendix 7 of this document.

5.1.4. Compliance with Relevant BAT Requirements

It is considered emissions to air (both source and fugitive) meet relevant BAT requirements laid out in Section 3 of Guidance Note *"How to Comply"* and PGN EPR6.10.

5.2. Emissions to Water

5.2.1. Additional Foreseeable Emissions to Water

5.2.1.1. Additional Emissions to Sewer

Additional releases to sewer will be through a purpose built sealed drainage system; joined up to the main existing waste water effluent system. Site treatment arrangements are not discussed further as the new area will not require any changes to existing arrangements.

Compliance of total site releases to sewer is currently measured against limits set out within the site Trade Effluent Discharge agreement. It is expected that a small increase in effluent discharge amounts will be experienced. An assessment of the composition of the wastewater has been predicted, and the site will be comfortably within the Discharge Consent limits (currently set at 4000 mg/l COD, 2000 mg/l SS). Conversely, a 'dilution' effect is expected on the total site waste water effluent through S1 – due to the large amounts of water used for clean down operations.

Raw materials will be kept out of the wastewater system as the products used within the new area are likely to have a high COD content (batter, rice). Waste product discharging to drains is something that is controlled successfully throughout the factory currently (monitoring and auditing).

Within the existing site Permit, emission limits relating to cadmium and mercury in waste water are set. Compliance is demonstrated through an annual mass balance calculation. Additional cleaning chemicals will be used within the new area, therefore it is expected that levels of mercury and cadmium within the waste water effluent will increase. The cleaning chemicals used in the new area will be the identical type as those currently used in other parts of the site. A forecast of increased usage has been used to produce an accurate addition to the current site mass balance calculation. This calculation for an approx increase of 10% (very much a worst case scenario) the calculations still put the site comfortably under the annual limits – see section 6.2.1. for further discussion.

5.2.1.2. Additional Emissions to Surface Water (Including Stormwater)

There will be no emissions to surface water from the new area. Existing roof rainwater collection will remain unchanged. Current site surface water drainage arrangements will remain unchanged. Exit via W1 is via several site interceptors. These interceptors, and their proximity to the new area, are annotated on the Plan included in Appendix 2.

5.2.1.3. Additional Emissions to Groundwater

There will be no emissions to groundwater from the new area.

5.2.2. **Additional Potential Fugitive Emissions to Surface Water**

All activities within the new area will be undertaken internally, which is serviced by the wastewater effluent drainage system. There will be no external cleaning or storage of food or liquid raw materials within the area.

There will be external waste food oil storage at the new area. The fryers will be emptied to the storage tank. It will be above 1000 litres and will be bunded. The oil will be transferred to the tank via pumped pipework. All decanting (into IBCs for onward sale as biofuel) will be undertaken within the bunded skin.

5.2.3. **Additional Potential Fugitive Emissions to Groundwater**

There is no potential for fugitive releases to groundwater.

5.2.4. **Compliance with Relevant BAT Requirements**

It is agreed that the above factors comply with the relevant BAT requirements laid out in Section 3 of Guidance Note *"How to Comply"* and PGN EPR6.10.

5.3. **Emissions to Land**

There are no proposed emissions to land from the new area and activities.

5.4. **Noise and Vibration Emissions**

5.4.1. **Main Additional Sources of Noise and Vibration**

All mechanical equipment will be housed internally (moving conveyers for chilling and packing lines) It is considered that all activities from the new area will be free from noise and vibration at levels likely to be detected outside the site.

There will not be any additional noise control measures proposed within this Application.

5.4.2. **Compliance with Relevant BAT Requirements**

It is considered emissions to air (both source and fugitive) meet relevant BAT requirements laid out in Section 3 of Guidance Note *"How to Comply"* and PGN EPR6.10. Proposed activities have also been referenced against Horizontal Guidance Note H3.

6. OPERATIONS

6.1. Operating Techniques/ Technical Standards

The following information has been cross referenced with the BAT requirements in PGN EPR6.10 – Section 2: Operations.

Process Monitoring and Control Equipment.

- The whole area is temperature controlled. Temperature measurement is undertaken in all various parts (differences for chilling, operating, packing). Any failures are alerted to engineers immediately. These controls reduce the deterioration of products; which could have a significant risk to human health upon consumption.
 - Level measurement is applied to all aspects of batch control. No product mixing/decanting is left to operator control thereby minimising error and importantly, preventing overflow from storage and mixing tanks.
 - Flow control is used to regulate process water and ingredients within the mix.
-

6.2. Nature of Raw and Auxiliary Materials

6.2.1. Additional Raw Materials

Raw materials proposed for use within the new area will be food, packaging and additional cleaning chemicals.

Food raw materials will not be stored within the proposed new area. During production, batter mixing will be undertaken manually operated but electronically controlled. Any spillages from this activity would be captured by the waste water drainage system.

Additional cleaning chemicals will be used to clean and sanitise the new area after each production. There are no new types of chemicals being used, just more of the same food safe standard, customer approved products. Note. There will be no chemical storage areas within the new area – chemicals will be dosed through portable dosing units.

Raw materials and additional water used within the relevant processes are recorded and monitored to ensure efficiency.

The estimated annual increase in chemicals and their overall heavy metal composition of final waste water discharge has been calculated through a mass balance. In summary, an increase in 10% of existing chemicals against predicted effluent discharge has been applied. The site is currently comfortable under the existing Permit conditions of – 2800 g/year annual release of cadmium (2014 result 13.49 g/year) and an annual release limit of 330 g/year of mercury (2014 result of 37.98 g/year).

6.2.2. Additional Auxiliary Materials

It is assumed that there will be an increase in mains water used within the new area. Water will be used in small amounts for the actual product (batter mix) but mostly for cleaning and sanitation purposes. A water efficiency audit is undertaken in compliance with current Permit every 4 years. The new area will be incorporated into this.

Site water is monitored daily and tracked against production tonnage. This information is reviewed weekly by Senior Management to track for obvious leaks or inefficient product mix. All activities within the new area will be included in these site measures. Water sub metering will be set up with the new area, so greater control will be available.

6.2.3. Compliance with Relevant BAT Requirements

It is considered that the use of raw materials and water meets the BAT requirements laid out in Section 3 of Guidance Note *"How to Comply"*.

6.3. Cleaning and Sanitation

- 6.3.1. A significant amount of current site water is utilised in cleaning and sanitation. The site is continually addressing ways of water saving whilst meeting strict hygiene controls and customer technical control requirements.

A summary of site measures is listed below – the nomenclature follows the format listed under indicative BAT in PGN EPR6.10.

- Raw materials and product are kept out of the drainage system. This is called in the industry 'chase the pea' and training in this issue is provided at induction and annually through a refresher. Monthly monitoring of areas is undertaken to monitor operator control with regard to water usage. These audits are numerically scored and results disseminated site wide.
- Dry cleaning is utilised as much as possible before water is applied. This cleaning is undertaken by production staff before handover to the hygiene shift. Any areas found not in an unsatisfactory state are reported through the morning production meeting.
- Trigger hoses will be used in the new area to optimise operator water control.
- Hygiene operatives are thoroughly trained in manual operation of cleaning chemicals and equipment used – this will control over dosing.

6.4. Waste Minimisation (Minimising the Use of Raw Materials)

6.4.1. Measures to Minimise the Use of Raw Materials (Including Water)

Within the new area, the process design is limited to a few types of similar products within a straightforward process. Therefore, raw materials can be accurately ordered, measured and made so it is anticipated that waste production will be low. Raw material and product is measured and any wastage is flagged daily.

Where waste cannot be avoided, all food waste will be sent to an offsite waste to energy plant (AD Plant). The non organic waste from the new area, along with all other wastes from site, will be recycled. The site is currently striving to reinstate on site AD technology, to reap the renewable energy. Progress is being made for application in early 2016.

Packaging for the products will be specifically ordered in accordance to customer orders. In the event of excess packaging, it will be returned to packaging stores for reuse or if no longer in use, taken directly to the recycling area.

It is considered that waste generated by new activities will be treated in accordance with the waste hierarchy in Article 4 of the Waste Framework Directive.

6.4.2. Waste Minimisation Audits

Waste generated the previous day is discussed and root cause established at the morning production meeting. This meeting is attended by the Site General Manager and the Ops Managers. In 2015 waste production per tonne of product has dramatically improved.

A waste minimisation audit is undertaken in accordance with the current Permit requirements every 2 years.

6.4.3. Compliance with Relevant BAT Requirements

It is considered waste minimisation and avoidance meet relevant BAT requirements laid out in PGN EPR6.10 – section 1.4. Below Section (Section 6.6.) has been assessed against “How to Comply” Section 3.

6.5. Waste Management, Prevention and Reduction Measures

6.5.1. Nature and Quantities of Additional Wastes Produced

It is estimated that the new activities will produce an additional 30 tonnes of waste per annum. This waste will be categorised as 'food' or 'packed food' when entering the offsite AD Plant.

6.5.2. Waste Handling Arrangements for Additional Wastes Produced

6.5.2.1. Waste Management Arrangements

In accordance with current site waste management arrangements, there will be line bins provided. These bins will be colour coded and separate arrangements made for food and packaging wastes. There are no waste storage areas proposed for the new area. All site waste storage and sorting will remain unchanged.

Any wastes that are taken from the site (off site recycling) are characterised by their correct EWC code. All waste management companies used by the site are required to supply correct licenses and details prior to any wastes being removed from site.

7. MONITORING ARRANGEMENTS

7.1. Monitoring of Releases

There is no point source monitoring proposed.

7.2. Environmental Monitoring

There is no additional environmental monitoring proposed. Details of current site wide environmental monitoring (operational control audits as part of the site EMS, PPM, etc), of which the new area will apply, has been referenced throughout this document.

8. RESOURCE EFFICIENCY AND CLIMATE CHANGE

8.1. Energy Efficiency

8.1.1. Energy Management and Efficiency Measures

There will be a small overall site increase in energy use (natural gas, thermal oil and mains electricity) for the processes within the new area. The equipment is brand new. The area will be managed in accordance with existing energy saving behaviour implemented across the site currently.

Existing energy and environmental monitoring - Currently, the site is divided into 8 areas and each respective area is measured monthly against specific measurable criteria; Line control, fridge management, efficient behaviour, engineering failures etc. These audits are numerically scored; the results of which are disseminated site wide. The new area will be incorporated into these audits. Additionally, the area will have a nominated environmental champion, who will be responsible for setting energy reduction plans with the Environment Manager.

Energy usage is sub metered in some areas of the factory. Site wide energy use is monitored and recorded daily. These numbers are assessed against production tonnage and reviewed weekly by Senior Management. The new area will have energy sub metering, and be ahead of the rest of the factory!

Energy efficient LED lighting will be incorporated into the new area.

Dual control fridges will be used, to better control closing mechanisms, a known energy inefficiency.

A site wide Energy review is undertaken annually. This is part of the site externally certified EMS. Current energy saving projects are detailed within the EMS and are externally assessed as appropriate to the size and nature of the site.

8.1.2. Compliance with Relevant BAT Requirements

It is considered energy efficiency proposals meet the relevant BAT requirements laid out in Section 3 pg 43 of Guidance Note *"How to Comply"* and PGN EPR6.10. Proposed activities have also been referenced against Horizontal Guidance Note H2.

8.2. Climate Change Levy Agreement and Carbon Trading Schemes

The Site has a valid CCLA Agreement Identifier No – FDF1/T00543 (Underlying Agreement with site targets in Appendix 8).

The site holds an EU Emissions Trading Scheme Permit also – Emissions from the new area will be included in these targets from 2016 in the Phase III scheme.

9. MEASURES TO IDENTIFY, ASSESS AND MINIMISE THE ENVIRONMENTAL RISKS AND HAZARDS OF ACCIDENTS AND THEIR CONSEQUENCES

9.1. Environmental Emergency Plan

There is in place a site wide Accident Management Plan. This forms part of the existing Permit requirements and also the EMS aligned with ISO 14001. The Plan is externally certified annually.

The AMP assesses the risks from site wide issues, details the prevention and mitigation measures and provides specific control procedures where required. The areas assessed are:

- fire (and associated firewater containment);
- ammonia release;
- flood;
- loss of mains electricity;
- storage of liquid materials;
- hazardous waste storage
- Mass release of Balance Tanks
- Releases to air via stacks
- Effluent Treatment Plant 'pit' overflow to surface water drains in area
- Vandalism

The plan has been reviewed in February 2015. There will be no changes to the site wide plan due to the new area and proposed activities. Note – the section 'Releases to Air via Stacks' may be reviewed further if any additional monitoring or control requirements are added by Natural Resource Wales on provision of Variation.

9.2. Investigating Incidents and Near Misses

The site has an environmental accident reporting system in accordance with the requirements of an EMS aligned to ISO 14001. All near misses are investigated also. System form ENVF-001 Environmental Hazard & Incident Form is filled in by the respective area manager investigating the incident. There is a requirement for corrective action in the event that further action is required i.e. training, physical containment in event of spill, engineering follow up etc. All incident forms are signed off by the Environment Manager before they are uploaded to the EMS recording system.

The new area and all proposed activities will come under the requirements of accident control and investigation.

9.3. Emergency Procedures

Site wide emergency procedures have been compiled for site. The procedures have been reviewed and no amendments or replacements are required. All employees working within the new area will receive appropriate area specific training.

9.4. Planned Preventative Maintenance

Equipment within the new area will be added to the current electronic PPM system and maintained accordingly.

9.5. Compliance with Relevant BAT Requirements

It is considered that environmental risk from the new area and proposed activities is very low. All major site accidents and details of how they are controlled was submitted with the original Permit Application.

The Environmental Emergency Plan is reviewed annually and some items are periodically tested (spill procedures). This is considered BAT.

10. CESSATION OF ACTIVITIES AT THE INSTALLATION

10.1. Site Closure Report

The existing SCP will be reviewed and revised where necessary to take account of the proposed additional activities.