

Tim Howell

From: Ellis, Rhys <Rhys.Ellis@cyfoethnaturiolcymru.gov.uk>
Sent: 12 December 2018 17:06
To: Tim Howell
Subject: FW: Lloyds Animal Feeds Wrexham - EPR/AB3492ZQ Permit Variation Discussions

Hi Tim,

Thanks for your response.

From the information you have provided to date and by liaising with our permitting department it appears that this could fall under minor technical variation.

You will need to submit a permit variation application to our permitting centre. Please see link below .

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

You must complete the following sections

- A - - About you
- C2** - Varying a bespoke permit: General
- C3** - Varying a bespoke installation permit
- F - Opra, charges and declarations

It would be prudent to submit an updated site plan with your application (Basically updating the one that's in your permit already)

You must include supporting information such as information provided in your previous emails (below) in your application to demonstrate that you have carried out a risk assessment of the increased tonnages. It would be also useful for you to include the recent clarification you provided me.

The process description document that you provided with the original application is listed in the operating techniques table of the permit , therefore it is advisable that this is either updated or an additional document provided to reflect any changes resulting from the variation.

A summary of your EMS should be provided to show how it will be updated as a result of the variation.

It would be useful If you could provide me with details of expected timescales for this the submission of this variation so I can give our permitting centre a heads up. Thank you.

I can also confirm that I have received your Response & Feedback to CAR_NRW0033731. Thank you for responding and its encouraging that matters are being addressed. I will respond in due course in regards to this.

In the meantime may I wish you a happy Christmas and a speedy recovery following your treatment.

Kind regards

Rhys

Rhys Ellis

Regulatory Officer, Industry Regulation Team, Natural Resources Wales
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Yn falch o arwain y ffordd at ddyfodol gwell i Gymru trwy reoli'r amgylchedd ac adnoddau naturiol yn gynaliadwy.

Proud to be leading the way to a better future for Wales by managing the environment and natural resources sustainably

From: Tim Howell <TimH@lloydsanimalfeeds.com>

Sent: 03 December 2018 14:46

To: Ellis, Rhys <Rhys.Ellis@cyfoethnaturiolcymru.gov.uk>

Subject: RE: Lloyds Animal Feeds Wrexham - EPR/AB3492ZQ Permit Variation Discussions

Rhys,

None of our parameters are changing in terms of the physical equipment and plant used for processing in this initial capacity increase stage.

The emission points are all of the same dimensions and locations. We will continue to use the same fans and ducting so volumetric throughput, temperatures, flowrate and velocity etc. should remain the same.

Obviously the amount of particulate emission as an aggregated total will likely increase as we will shorten the time between batches (when there are zero emissions), but we are confident that the in line emission monitoring and cyclone efficiencies will keep us well below the current permit limits at all times.

If you need a more technical answer to your question, I would need to refer to our consultants for advice – let me know

Kind Regards,

Tim

Tim Howell
Group Operations Manager
Lloyds Animal Feeds
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From: Ellis, Rhys [<mailto:Rhys.Ellis@cyfoethnaturiolcymru.gov.uk>]
Sent: 03 December 2018 14:32
To: Tim Howell <TimH@lloydsanimalfeeds.com>
Cc: Kevin Bright <KevinB@lloydsanimalfeeds.com>; Paul Jones <PaulJ@lloydsanimalfeeds.com>
Subject: RE: Lloyds Animal Feeds Wrexham - EPR/AB3492ZQ Permit Variation Discussions

Good afternoon Tim,

Thanks for your email. Before I liaise with our permitting centre could you confirm one matter for me please.

Looking at your Air quality assessment of emission particulate matter form ref P3015/R001(attached) , Table 4 highlights Stack parameters used for the study, and details Volumetric flow rate (m3/s) for **A1** of 5.07, **A2** of 5.16 and **A3** of 2.40. Are the flowrate likely to remain the same? , if not, by how much do you estimate they might vary ?

Kind regards

Rhys

Rhys Ellis

Regulatory Officer, Industry Regulation Team, Natural Resources Wales
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From: Tim Howell <TimH@lloydsanimalfeeds.com>
Sent: 26 November 2018 12:23
To: Ellis, Rhys <Rhys.Ellis@cyfoethnaturiolcymru.gov.uk>
Cc: Kevin Bright <KevinB@lloydsanimalfeeds.com>; Paul Jones <PaulJ@lloydsanimalfeeds.com>
Subject: Lloyds Animal Feeds Wrexham - EPR/AB3492ZQ Permit Variation Discussions

Rhys

Further to our ongoing discussions regarding a permit variation, and your feedback, I would comment as follows:

- The tonnage limit for the revised permit will now be requested for 225,000t per annum not 250,000t as originally discussed
- We have reviewed our aspect register and significant environmental aspects and consider there would be no change to the risks and probabilities identified
- General risk assessments across the site will not be affected by the capacity increase
- The increase in capacity will be achieved by reducing the downtime between batch cycles. This will be achieved by removing process bottlenecks
- The proposed new ingredient dosing system will see us move away from 25kg paper sacks to bulk tote bags thus reducing the amount of paper waste
- Reported dust emission annual figures are calculated by taking the hourly average from testing and annualised for all running hours and does not consider downtime between batches – therefore we conclude

the total emissions in g/m³/hr is unlikely to increase with any significance the total annualised output. Our current reportable total is way below our permit limits now, so even a small increase is unlikely to lead to us exceeding those limits. We still have the protection of continuous emission monitoring to safeguard against exceeding limits

- General site noise from production will not vary as the plant and machinery runs continuously now albeit at a lower throughput rate. Increasing the rate does not increase noise levels generated by the individual machines or processes
- Boiler emissions are more likely to improve than deteriorate as efficiency of burn will be maintained for longer periods due to the demands of higher throughput (Currently we have no limits set as part of the permit)
- We will increase consumption of Gas and Electricity overall, but due to efficiencies gained this is likely to reduce consumption per tonne of finished product
- Process water consumption is also likely to increase in line with tonnages produced but will remain at a similar level per tonne produced
- Diesel consumption will increase in line with finished product tonnage for deliveries, but unlikely to increase usage per tonne delivered
- The increase in capacity will lead to extra vehicle movements on and off site. We estimate this to be in the order of max 8 or 9 vehicle movement each day (80kt = 40kt in and 40kt out - divided by 52 weeks divided 6 days divided by 30t loads = 8 or 9 loads per day in and out). The new proposed raw material storage will also lead to less vehicles returning to site each day empty (due to lack of raw material storage), and this can be deducted from the daily 8-9 movements - these empty vehicles make more noise than a full one, which will go some way to compensate for the increased vehicle noise.
- The increased rate on the intake system will reduce exhaust emissions from vehicles as the turnaround time will be improved so less time running engines to power tipping equipment
- We do not intend to change the number or capacity of any liquid storage tanks on site for this stage of development.

I feel we have reviewed and considered the salient impacts of this increase on our operations and emissions and conclude the existing systems and procedures in place will be sufficient to cover the revised tonnage. The next stage project will be much more complex and will require some changes to be made, but this is likely to be some way off yet.

Please let me know if there is more that I need to do to satisfy NRW that this application warrants a minor or a standard change charge, rather than a full blown application and modelling etc.,

Is there a formal process now to apply for this variation, or does our correspondence constitute our "application"?

Kind Regards,

Tim

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