

Natural Resources Wales permitting decisions

Variation and Consolidation of a bespoke Permit – Wynnstay Group P.L.C.

We have decided to issue a Natural Resources Wales initiated variation and consolidated permit for Llysonnen Mill in Travellers Rest operated by Wynnstay Group P.L.C.

The permit number is EPR/EP3034GS.

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.

The permit has been varied following the publication of the revised Best Available Techniques (BAT) Reference Documents (BREF) for Food, Drink and Milk Industries. The associated BAT conclusions to this document were published on 4 December 2019 in the Official Journal of the European Union.

This variation incorporates the changes required by the Industrial Emissions Directive following a statutory review of permits in the Food, Drink and Milk sector. These include the amendment of the wording of several permit conditions relating to notifications, changes to emissions limits and monitoring requirements.

We are satisfied that the operator will be compliant with the published BAT conclusions which will apply from 4 December 2023.

Purpose of this document

This decision document:

- explains how we have carried out our statutory review of the Operator's Permit;
- why we have decided to vary the Permit as a result of that review; and
- why we have included the specific conditions in the revised Permit through the variation notice we are issuing.

It is our record of our decision-making process, to show how we have taken into account all relevant factors in reaching our position.

Structure of this document

- Assessment of Llysonnen Mill against the published BAT conclusions for Food, Drink and Milk Industries.
- Annex 1 – Decision Checklist regarding relevant BAT Conclusions for Food, Drink and Milk Industries

Assessment of Llysonnen Mill against the published BAT conclusions for Food, Drink and Milk Industries

1. Our decision

We have issued a variation, which will allow the Operator to operate the installation, subject to the conditions in the varied permit.

The variation does three things:

- it consolidates the original permit to reflect changes made through earlier variations;
- it brings the permit into line with our modern regulatory template; and
- it varies the permit where appropriate to reflect the outcome of our statutory review and incorporate Best Available Techniques (BAT) and Associated Emission Limit Values (BAT-AELs).

We consider that, in reaching this decision, we have taken into account all relevant considerations and legal requirements and that the permit will continue to ensure that a high level of protection is provided for the environment and human health.

The original permit, issued on 05/07/2010 ensured that the installation, employed BAT and ensured a high level of protection for human health and the environment. We have altered the permit as a result of the statutory review, and we are confident that the new requirements will deliver a higher level of protection to that which was previously achieved. Where a site is not currently compliant with BAT, Improvement Conditions have been included to bring the site up standard by 4 December 2023.

2. The legal framework

The variation and consolidation Notice (which includes the consolidated permit as Schedule 2) will be issued under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 (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 Industrial Emissions Directive (IED);
- subject to aspects of other relevant legislation which also have to be addressed.

We consider that, in issuing the Variation and Consolidated Permit, it will ensure that the operation of the installation complies with all relevant legal requirements and that a high level of protection will be delivered for the environment and human health.

We explain how we have addressed specific statutory requirements more fully in the rest of this document.

3. How we reached our decision

Requesting information to demonstrate compliance with BAT Conclusion techniques

We issued a Notice under Regulation 61(1) of the Environmental Permitting (England and Wales) Regulations 2016 on 28/04/2020 requiring the operator to provide information to demonstrate how the operation of their installation currently meets, or will subsequently meet, the revised standards described in the relevant BAT Conclusions document.

The Regulation 61(1) Notice required the operator to:

- Describe the techniques that will be implemented before 4 December 2023, which will then ensure that operations meet the revised standard, or
- Justify why standards will not be met by 4 December 2023, and confirmation of the date when the operation of those processes will cease within the installation or an explanation of why the revised BAT standard is not applicable to those processes, or
- Justify why an alternative technique will achieve the same level of environmental protection equivalent to the revised standard described in the BAT Conclusions.

- Where their permitted activity involves the use, production or release of a hazardous substance, as defined in Article 3(18) of the Industrial Emissions Directive, the Operator was required to carry out a risk assessment considering the possibility of soil and groundwater contamination at the permitted installation with such substances. Where risk of such contamination is established prepare a baseline report containing information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definite cessation of the activity.
- Where their permitted activity involves the use, production, storage or release of priority hazardous substances and any other relevant substances., as defined by the Water Framework Directive, the Operator was required to carry out a risk screening assessment considering the presence of priority hazardous substances at the permitted installation. Where a risk of these substances is established the operator is to sample the effluent and screen for the priority hazardous substances. If these substances are found to be present in the effluent stream, then assessment using the H1 tool and potential detailed modelling will be required to demonstrate that the effluent discharge will not have a significant impact to the receiving water.

Where the operator proposed that they were not intending to meet a BAT standard, that also included a BAT Associated Emission Level (BAT-AEL) described in the Food, Drink and Milk BAT Conclusions Document, the Regulation 61(1) Notice requested that the operator make a formal request for derogation from compliance with that AEL (as provisioned by Article 15(4) of IED). In this circumstance, the Notice identified that any such request for derogation must be supported and justified by sufficient technical and commercial information that would enable us to determine acceptability of the derogation request.

The Regulation 61(1) Notice response from the operator was received on the 28/10/2020 and additional information received on 30/09/2021 and 21/10/2021.

We considered that the response contained sufficient information for us to commence determination of the permit review. The operator made no claim for commercial confidentiality. We have not received any information in relation to the Regulation 61(1) Notice response that appears to be confidential in relation to any part.

4. Key issues/Regulation 61 response

BAT Conclusions for the Food, Drink and Milk Industries were published as Commission Implementing Decision EU 2019/2031 in the Official Journal of the EU on 4 December 2019. There are 37 BAT Conclusions. Annex 1 provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This should be read in conjunction with the permit/variation notice issued.

A detailed response was received from the Operator. Where the operator has concluded that they have achieved BAT, and we are in agreement, no further information or justification has been sought by Natural Resources Wales.

Baseline site condition report

Where their permitted activity involves the use, production or release of a hazardous substance, as defined in Article 3(18) of the Industrial Emissions Directive, the Operator was required to carry out a risk assessment considering the possibility of soil and groundwater contamination at the permitted installation with such substances. Where risk of such contamination is established prepare a baseline report containing information necessary to determine the state of soil and groundwater contamination so as to make a quantified comparison with the state upon definite cessation of the activity.

The Operator has provided no response regarding the above request within the Regulation 61(1) Notice; therefore an improvement condition has been included in the permit.

5. Changes we have made

Improvement Conditions

Based on the information provided in the Regulation 61(1) response, we consider that we need to set improvement conditions. These conditions are set out below. We are using these conditions to require the operator to provide Natural Resources Wales with details that need to be established or confirmed during operations. The improvement conditions ensure compliance by 2023.

IC6	The Operator shall complete and submit for approval in writing by Natural Resources Wales: • A baseline report containing information necessary to determine the current state of soil and groundwater contamination; - or • Provide a summary report referring to information previously submitted where you are satisfied that such information represents the current state of soil and groundwater contamination; so as to enable a quantified comparison to be made with the state of soil and groundwater contamination upon definitive cessation of activity.	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC7	The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: • BAT Conclusion 15 of the Food, Drink and Milk Industries BRef Document (EU 2019) – Set up, implement and regularly review an Odour Management Plan (as part of the EMS) that includes all of the specified elements	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC8	The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: • BAT Conclusion 13 of the Food, Drink and Milk Industries BRef Document (EU 2019) – Set up, implement and regularly review a Noise Management Plan (as part of the EMS) that includes all of the specified elements	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC9	The Operator shall submit to Natural Resources Wales an updated written procedure(s) describing how they intend to meet the following BAT requirements in accordance with requirements specified within: • BAT Conclusion 2 of the Food, Drink and Milk Industries BRef Document (EU 2019) – Establish and maintain a waste water and waste gas inventory as part of the Environment Management System	4 June 2023 or otherwise agreed in writing with Natural Resources Wales
IC10	(a) The Operator shall submit to NRW the maximum capacity of the installation that was used in the most recent risk assessment submitted to NRW. (b) The Operator shall submit to NRW for approval the maximum capacity of the installation at the current time. (c) If the maximum capacity of the installation has increased from the time of the last submitted risk assessment and the current time, the Operator shall review and update the risk assessment to account for the current maximum capacity. The risk assessment shall be submitted to NRW for review. Notes: The capacity is to be taken and presented using the same units from the relevant sub-section of Section 6.8, Part 2, Schedule 1 of the Environmental Permitting Regulations 2016 (as from time to time amended). Capacity is to be taken as the maximum possible capacity of the installation, not the maximum actual production. The risk assessment should follow the methodology set out in The Environmental Risk Assessment (EPR-H1). You may use a methodology other than EPR-H1 however the methodology must address the same issues as in EPR-H1 to an equivalent level of detail.	(a) and (b) Within 6 months of permit variation issue (c) Within 9 months of permit variation issue (if applicable)

IC6 has been included as the Operator did not provide any response regarding the request within the Regulation 61(1) Notice for the baseline site condition report.

IC7 – IC9 have been included due to deficiencies in the BAT assessment completed by the Operator, see Annex 1 for more details.

Capacity creep

We have included an improvement condition (IC10) in order to establish the current maximum capacity at the installation and to determine if there has been a change since the last risk assessment submitted to NRW. If there has been an increase in the maximum capacity, what we call capacity creep, we have asked the Operator to review and update their risk assessment and submit to us for review. We have also implemented a maximum capacity limit into Table S1.1 of the permit in line with the IC response to prevent any further capacity creep at the installation.

Other changes

We have updated the operating techniques table to include any operating techniques necessary. We have updated the improvement conditions table to detail the status of any existing conditions if applicable. We have updated the site plan on the permit as the original site plan was not clear regarding the location of the emission points. We have updated the formatting of table S3.2 to the modern format and have changed the Source of W1 emission to not include process effluent as this discharge does not include any process effluent as confirmed by the Operator.

Operational Changes

No operational changes have occurred at the site during the variation. Through discussions with the Operator it was evident there is an additional emission point (A5) which relates to grinding during compound feed manufacture. This emission point is not currently permitted and we have not added it as part of this permit review. The Operator has been advised to submit a variation application to add this emission point to the permit.

Medium Combustion Plant (MCP) / Specified Generator (SG)

The installation has one existing combustion unit already listed in Table S1.1 as a Directly Associated Activity and with emission point (A3) in Table S3.1. The existing combustion unit is a kerosene fuelled boiler. The Operator has confirmed the existing boiler is 2.5 MW thermal input and therefore is classed as an existing MCP. Emission Limit Values (ELVs) and monitoring for existing MCPs is not required until 1st January 2025 at the earliest. As this is some way off, we decided to maintain any existing ELVs

and monitoring requirements in the permit and not to impose new stricter ELVs ahead of time.

Emissions to Water

As part of our delivery of the Water Framework Directive requirements, we need to identify and assess the impact for all discharges to surface waters and/or sewer from the site for priority hazardous substances and any other relevant substances. The emissions monitoring for these substances should be carried out using the methods and standards described in the M18 guidance on “Monitoring of discharges to water and sewer”.

With reference to the risk assessment guidance on the gov.uk website entitled “Surface water pollution risk assessment for your environmental permit” (accessible via: <https://www.gov.uk/guidance/surface-water-pollution-risk-assessment-for-your-environmental-permit>) the company carried out the following assessments:

- Screening tests for priority hazardous pollutants and any other relevant priority hazardous substances.
- For any substance which is not screened out by the screening tests further modelling, as described in the risk assessment guidance “Surface water pollution risk assessment for your environmental permit”.

The Operator has one discharge to surface water of foul sewer effluent and surface water run-off, it does not include any process effluent. We have not identified any priority hazardous pollutants or any other relevant priority hazardous substances in the discharge to surface water therefore we do not consider it necessary for the Operator to complete the screening tests.

The specific BAT Conclusions on water emissions were also reviewed based on the Food, Drink and Milk BREF, specifically BAT Conclusion 12. As per Note 1 in the table BAT-AELs do not apply to emissions from the production of compound feed, therefore no BAT-AELs apply and there is no change in the current ELVs. The discharge to surface water does not include any process effluent as confirmed by the Operator therefore is not within scope of the BREF, neither BAT Conclusion 12 nor BAT Conclusion 4.

Emissions to Water – Article 15(4) Derogations

No derogations.

Emissions to Air

There were changes to the Emission Limit Values (ELVs) for emissions to air taking into account BAT conclusions from the Food, Drink and Milk BREF. No grain milling is carried out on site, therefore the BAT-AELs relevant are for pellet cooling and grinding. The Operator has confirmed emission points A1 and A2 relate to pellet cooling processes. Emission Point A4 relates to raw material intake extraction unit therefore is not subject to BAT-AELs or any monitoring as stipulated in the BREF. The Operator has stated their intention to be compliant with the BAT-AELs by the compliance deadline.

The tables below outline the parameters and limits set to implement the BAT-AELs:

Effective until 3 December 2023

Release point	Parameter	Limit / BAT-AEL	Effective until
A1	Particulate matter	50 mg/m ³	3 December 2023
A2	Particulate matter	50 mg/m ³	
A4	No parameters set	No limit set	

Effective from 4 December 2023

Release point	Parameter	Limit / BAT-AEL	Effective from
A1	Particulate matter	20 mg/Nm ³	4 December 2023
A2	Particulate matter	20 mg/Nm ³	
A4	No parameters set	No limit set	

Where BAT associated emission levels are identified, limits may be prescribed at the top end of the range unless the proximity of sensitive receptors requires a tighter limit or if tighter limits are previously on the permit, this ensures no backsliding of emission limits.

Emissions to Air – Article 15(4) Derogations

No derogations.

Other IED BREFs relevant to the permit review

There are no other listed activities within Table S1.1 of the permit.

6. Conclusion

We consider that the installation already employed what used to be BAT, and that the operator has achieved significant improvements in performance since the permit was originally granted. The revised BREF and its BAT-AELs provide the opportunity to consider further environmental improvements.

Coupled with the consolidation and modernisation of the permit, we believe this variation provides a sound basis for ongoing regulation of the installation and we are satisfied that the operator is currently achieving or will be achieving all relevant BAT by 4 December 2023. We believe that we have ensured compliance with all relevant legal requirements in carrying out this review and making our determination on the variation.

Annex 1: Decision checklist regarding relevant BAT Conclusions for Food, Drink and Milk Industries

BAT Conclusions for the Food, Drink and Milk Industries were published as Commission Implementing Decision EU 2019/2031 in the Official Journal of the EU on 4 December 2019. There are 37 BAT Conclusions. This checklist provides a record of decisions made in relation to each relevant BAT Conclusion applicable to the installation. This annex should be read in conjunction with the permit.

All BAT Conclusions arising are listed by number in order below;

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
OVERALL ENVIRONMENTAL PERFORMANCE			
1	Environment Management System (EMS) – <u>ALL</u> of the following:		
	I.	Commitment, leadership and accountability of the management, including senior management for the implementation of an effective EMS	Currently Compliant The Operator has confirmed each section of this BAT conclusion is achieved through their EMS and various operating procedures. The have referenced each section of the EMS or procedures in the response.
	II.	An analysis that includes the determination of the organisation's context, the identification of the needs and expectations of interested parties, the identification of characteristics of the installation that are associated with possible risks for the environment (or human health) as well as of the applicable legal requirements relating to the environment.	
	III.	Development of an environmental policy that includes the continuous improvement of the environmental performance of the installation	
	IV.	establishing objectives and performance indicators in relation to significant environmental aspects, including safeguarding compliance with applicable legal requirements;	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	V.	Planning and implementing the necessary procedures and actions (including corrective and preventive actions where needed), to achieve the environmental objectives and avoid environmental risks;	
	VI.	Determination of structures, roles and responsibilities in relation to environmental aspects and objectives and provision of the financial and human resources needed;	
	VII.	Ensuring the necessary competence and awareness of staff whose work may affect the environmental performance of the installation (e.g. by providing information and training);	
	VIII.	Internal and external communication	
	IX.	Fostering employee involvement in good environmental management practices;	
	X.	Establishing and maintaining a management manual and written procedures to control activities with significant environmental impact as well as relevant records;	
	XI.	Effective operational planning and process control;	
	XII.	Implementation of appropriate maintenance programmes;	
	XIII.	Emergency preparedness and response protocols, including the prevention and/or mitigation of the adverse (environmental) impacts of emergency situations;	
	XIV.	When (re)designing a (new) installation or a part thereof, consideration of its environmental impacts throughout its life, which includes construction, maintenance, operation and decommissioning;	
	XV.	Implementation of a monitoring and measurement programme, if necessary, information can be found in the Reference Report on Monitoring of Emissions to Air and Water from IED Installations;	
	XVI.	Application of sectoral benchmarking on a regular basis;	
	XVII.	Periodic independent (as far as practicable) internal auditing and periodic independent external auditing in order to assess the environmental performance and to determine whether or not the EMS conforms to planned arrangements and has been properly implemented and maintained;	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	XVIII.	Evaluation of causes of nonconformities, implementation of corrective actions in response to nonconformities, review of the effectiveness of corrective actions, and determination of whether similar nonconformities exist or could potentially occur;	
	XIX.	Periodic review, by senior management, of the EMS and its continuing suitability, adequacy and effectiveness;	
	XX.	Following and taking into account the development of cleaner techniques.	
	(i)	Noise Management Plan (BAT 13)	See BAT 13
	(ii)	Odour Management Plan (BAT 15)	See BAT 15
	(iii)	Inventory of water, energy and raw materials consumption as well as of waste water and waste gas streams (BAT 2)	See BAT 2
	(iv)	Energy Efficiency Plan (BAT 6a)	See BAT 6a
2	Establish and maintain a waste water and waste gas inventory as part of the EMS - <u>ALL</u> of the following:		
	Information about the food, drink and milk production processes, including;		
	I.(a)	simplified process flow sheets that show the origin of the emissions	Currently Compliant Operator has confirmed there are simplified process diagrams in place as part of their Environmental Manual.
	I.(b)	descriptions of process-integrated techniques and waste water/waste gas treatment techniques to prevent or reduce emissions, including their performance	Compliant in the future No waste water treatment techniques, however there is waste gas treatment techniques. The Operator has stated 'no waste gas streams', we do not agree therefore IC set.
	II.	Information about water consumption and usage and identification of actions to reduce water consumption and waste water volume (BAT 7)	Currently Compliant Water consumption and usage is recorded as per the permit requirements. See also BAT7
	Information on quantity and characteristics of the waste water streams, such as:		
	III.(a)	Average values and variability of flow, pH and temperature	Not Applicable

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	III.(b)	Average concentration and load values of relevant pollutants/parameters (e.g. TOC/COD, nitrogen species, phosphorus, chloride, conductivity) and their variability	No process effluent in waste water stream.
	Information on characteristics of waste gas streams, such as:		
	IV.(a)	Mean and variability of:	Compliant in the future The Operator has stated 'no waste gas streams' we do not agree as there are waste gas streams, therefore improvement condition has been set.
		Flow	
		temperature	
	IV.(b)	Mean concentration, load and variability of relevant substances:	
		Dust	
		TVOC	
		CO	
		NOx	
		SOx	
	IV.(c)	Presence of other substances that may affect the waste gas treatment system or plant safety:	
		O2	
		Water vapour	
		Dust	
	V.	Information about energy consumption and usage, the quantity of raw materials used, as well as the quantity and characteristics of residues generated, and identification of actions for continuous improvement of resource efficiency (BAT 6 and BAT 10)	
	VI.	Identification and implementation of an appropriate monitoring strategy with the aim of increasing resource efficiency, taking into account energy, water and raw materials consumption. Monitoring	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant	
		can include direct measurements, calculations or recording with an appropriate frequency. The monitoring is broken down at the most appropriate level (e.g. at process or plant/installation level).		
MONITORING				
3	For relevant emissions to water as identified by the inventory of waste water streams (BAT 2): monitor key process parameters at key locations			
	Key process parameters			
	Waste water flow		Not Applicable As per the interpretation document this BAT conclusion is considered Not Applicable as there is no process effluent treated in an ETP on site. There is a discharge to surface via reed bed treatment system however this is of foul sewage effluent and surface water run-off.	
	pH			
	Temperature			
	Key monitoring locations			
	Pre-treatment inlet and/or outlet			
	Final treatment inlet			
	Discharge point (to the environment)			
	Other location			
4	Monitoring of water emissions: monitor emissions to water with at least the frequency given below and in accordance with EN standards:		Not Applicable No process effluent within water discharge. Existing monitoring requirements will be maintained.	
	Refer to monitoring emissions to water table in BRef document			
5	Refer to monitoring emissions to air table in BRef document		Compliant in the future The pellet cooling A1 and A2 and currently compliant however the grinding is not. The monitoring requirements will be implemented through the permit. There is no grain milling carried out on site.	
	Monitoring parameters depend on sector			
6	Energy Efficiency: BAT is to use 6a and appropriate combination of common techniques			
	a.	Energy Efficiency Plan	Compliant in the future	

BATc number	Summary of BAT Conclusion requirement		Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
			The Operator has stated an energy efficiency plan is currently being implemented. The plan will include: • Specific energy consumptions • KPIs • Improvements planned, recorded and monitored via the environmental improvement programme
	b.	Use of common techniques	Currently Compliant The Operator has stated the following techniques are in place: • All replacement lighting is LED • Old motors replaced with energy efficient motors where possible • Boiler maintenance schedule in place • Steam distribution system is undergoing modification to improve. Old pipes are removed and new ones installed to conditioners • Process control system is being upgraded • Maintenance program in place to repair air leaks • Invertors in place on large motors
7	Water consumption and waste water discharge BAT is to use 7a and one or a combination of techniques in b to k		
	a.	Water recycling and/or reuse	Currently Compliant The Operator has stated that reuse of the vehicle wash is in operation. No process effluent from the process itself.
	b.	Optimisation of water flow	Currently Compliant

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	c.	Optimisation of water nozzles and hoses	The Operator has stated the following techniques are in place: • Air lines and vacuum cleaning in place • Minimal wet washing • Pressure washer used for external cleaning • Cleaning SOP requires timely cleaning • Dry cleaning
	d.	Segregation of water streams	
	e.	Dry cleaning	
	f.	Pigging system for pipes	
	g.	High-pressure cleaning	
	h.	Optimisation of chemical dosing and water use in cleaning-in-place (CIP)	
	i.	Low-pressure foam and/or gel cleaning	
	j.	Optimised design and construction of equipment and process areas	
	k.	Cleaning of equipment as soon as possible	
8	Harmful substances. BAT is to use one or a combination of the techniques given below:		
	a.	Proper selection of cleaning chemicals and/or disinfectants	Currently Compliant The Operator has stated the following techniques are in place: • Use of vehicle wash chemicals as per suppliers specifications • Dry cleaning
	b.	Reuse of cleaning chemicals in cleaning-in-place CIP	
	c.	Dry cleaning	
	d.	Optimised design and construction of equipment and process areas	
9	BAT is to use refrigerants without ozone depletion potential and with a low global warming potential		Not Applicable No refrigerants in use.
10	Increase resource efficiency, use one or a combination of the techniques given below		
	a.	Anaerobic digestion	Currently Compliant The Operator has stated little residues are produced in the production process; fines produced during cubing are reworked back into finished product. Any clean meal leaks or spills are also reworked into final product.
	b.	Use of residues	
	c.	Separation of residues	
	d.	Recovery and reuse of residues from pasteuriser	

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	e.	Phosphorus recovery as struvite	
	f.	Use of waste water for land spreading	
EMISSIONS TO WATER			
11	Prevent uncontrolled emissions to water, provide an appropriate buffer storage capacity for waste water		Not Applicable No process effluent steam. Waste water is only from foul sewer effluent and surface water run off.
12	Reduce emissions to water, use an appropriate combination of the techniques given below		Not Applicable No process effluent stream. A reed bed system is in operation for foul sewer effluent and surface water run off.
	a.	Equalisation	
	b.	Neutralisation	
	c.	Physical separation	
	d.	Aerobic and/or anaerobic treatment	
	e.	Nitrification and/or denitrification	
	f.	Partial nitrification	
	g.	Phosphorus recovery as struvite	
	h.	Precipitation	
	i.	Enhanced biological phosphorus removal	
	j.	Coagulation and flocculation	
	k.	Sedimentation	
	l.	Filtration	
	m.	Flotation	
BAT-AELs for direct emissions to a receiving water body. Table 1 and associated notes. Associated monitoring given in BAT 4.			

BATc number		Summary of BAT Conclusion requirement		Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
	Chemical oxygen demand COD	25–100 mg/L		Not Applicable As per Note 1 in the table the BAT-AELs do not apply to emissions from the production of compound feed.
	Total suspended solids TSS	4–50 mg/L		
	Total nitrogen	2–20 mg/L		
	Total phosphorus	0.2–2.0 mg/L		
NOISE				
13	Set up, implement, and regularly review a Noise Management Plan (as part of the EMS) where nuisance is expected and/or has been substantiated. Include ALL of the following:			Compliant in the future The Operator has stated there is a noise management plan implemented however they have not provided a copy therefore we cannot confirm if the NMP meets the requirements of the BAT Conclusion. Therefore, improvement condition set.
	I.	A protocol containing actions and timelines		
	II.	A protocol for conducting noise emissions monitoring		
	III.	A protocol for response to identified noise events, e.g. complaints		
	IV.	A noise reduction programme designed to identify the source(s), to measure/estimate noise and vibration exposure, to characterise the contributions of the sources and to implement prevention and/or reduction measures.		
14	Techniques to prevent, or where not practicable reduce noise and vibration emissions. Use one or a combination of the following:			Currently Compliant The Operator has stated the following measures are in place: - Bearings and control cabinets are monitored using condition based equipment and thermographic equipment - All staff suitably trained - Some operations that generate noise are not undertaken at night e.g. intake into external silos and processing reworks
	a.	Appropriate location of equipment and buildings		
	b.	Operational measures – see examples		
	c.	Low-noise equipment – see examples		
	d.	Noise control equipment – see examples		
	e.	Noise abatement – see examples		

BATc number		Summary of BAT Conclusion requirement	Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
			- No lorry tipping between 10 pm and 6 am - Low noise compressor used - Enclosures around some of the compressors - Most equipment located inside buildings
ODOUR			
15	Set up, implement, and regularly review an Odour Management Plan (as part of the EMS) where nuisance is expected and/or has been substantiated. Include ALL of the following:		
	I.	Protocol with actions and timelines	Compliant in the future The Operator has stated there is an odour management plan implemented however they have not provided a copy therefore we cannot confirm if the OMP meets the requirements of the BAT Conclusion. Therefore, improvement condition set.
	II.	Odour monitoring protocol	
	III.	Odour complaint response plan/protocol	
	IV.	Odour prevention and reduction programme	
BAT CONCLUSIONS FOR ANIMAL FEED			
Indicative	Indicative environmental performance levels for specific energy consumption Table 2 and footnotes		
	Compound feed	0.01 – 0.10 MWh/tonne of products	Indicative The Operator has stated their current environmental performance level is 0.105557 MWh/tonne of product (including electricity and kerosene) so just slightly over the range for compound feed. The lower end of the range is not achievable due to use of pellet cooling.
	Dry pet food	0.39 – 0.50 MWh/tonne of products	
	Wet pet food	0.33 – 0.85 MWh/tonne of products	
16 (Green fodder only)	Increase energy efficiency in green fodder processing use an appropriate combination of the techniques specified in BAT 6 and of the techniques given below:		
	a.	Use of predried fodder	Not Applicable No green fodder processing on site.
	b.	Recycling of waste gas from the dryer	
	c.	Use of waste heat for predrying	

BATc number		Summary of BAT Conclusion requirement		Status/comment One of the following: Not Applicable, Currently Compliant, Compliant in the future (within 4 years of publication of BAT conclusions), Not Compliant
Indicative	Indicative environmental performance levels for specific waste water discharge Table 3			
	Wet pet food	1.3 – 2.4 m³/tonne of products		Not Applicable
17	Reduce channelled dust emissions to air, use one of the techniques given below:			
	a.	Bag filter		
	b.	Cyclone		Currently Compliant Emission points A1 and A2 are both pellet cooling lines both emission points are fitted with cyclone abatement systems.
	BAT-AELs for channelled dust emissions to air from grinding and pellet cooling in compound feed manufacture Table 4 and its supporting notes. Monitoring requirements are outlined in BAT 5			
	Dust – grinding	New plant: < 2–5 mg/N³	Existing plant: < 2–10 mg/Nm³	
	Dust – Pellet cooling	< 2–20 mg/Nm³		Compliant in the future The Operator has stated there will be modifications to the cyclone systems on emission points A1 and A2 which relate to pellet cooling processes to ensure the BAT-AELs are achieved by the compliance deadline. Previous monitoring data indicates there has been some occasional exceedances of the BAT-AELs.

Annex 2: Consultation on the draft decision where an Article 15(4) derogation has been applied

Not Applicable