

Natural Resources Wales permitting decisions

Variation and Consolidation of a bespoke Permit – Oscar Mayer Limited (trading as Rowan Foods Limited)

We have decided to issue a Natural Resources Wales initiated variation and consolidated permit for Wrexham Convenience Foods in Ash Road South, Wrexham Industrial Estate, Wrexham, LL13 9UG operated by Oscar Mayer Limited trading as Rowan Foods Limited)

The permit number is EPR/WP3534GX.

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 Wrexham Convenience Foods 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 Wrexham Convenience Foods 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 11/03/2009, 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 superior 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 27/04/2020 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 26/10/2020 and additional information received on 15/12/2021.

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. Following assessment of the Regulation 61(1) response, further information was requested 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

The operator has not submitted a baseline site condition report in their response. However a site condition report submitted as part of their 2019 extension is still valid for the site.

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.

Table S1.3 Improvement programme requirements

Reference	Requirement	Date
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)
IC11	The Operator shall submit to Natural Resources Wales an updated written procedure following additional investigatory work describing how they intend to meet the following BAT requirements in accordance with the requirements specified within: - BAT Conclusion 9 of the Food, Drink and Milk Industries BRef Document (EU 2019) – In order to prevent emissions of ozone depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential The report should include but not limited to - a review of the use of the current refrigerant as to whether it meets the BAT requirements as specified above and; - a feasibility study and implementation plan (if appropriate) regarding the replacement of the current refrigerant with one with a lower global warming potential and no ozone depletion potential. Suitable alternatives include but not limited to ammonia, water and carbon dioxide. The report shall be submitted to Natural Resources Wales by the date specified for review. Natural Resources Wales will review the report to determine if the above BAT requirements have been achieved.	4 June 2023 or otherwise agreed in writing with Natural Resources Wales

IC11 has been included as the operator states that some HFC refrigerants will still be used, although the use is minimised. This IC has been included so that the operator can demonstrate a timetable for replacing any existing equipment that use ozone depleting substances with suitable alternatives when these come to the end of their expected lifetime.

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 changed the operation description A1 from S6.8 Part A (1) d (i) to S6.8 part A (1) d (iii). This was due to this activity not being updated since before 2016 when the 2016 Environmental Permitting Regulations amended S6.8 Part A (1) d (i) to process of only raw animal material and therefore no longer reflected the activity of the site.

We have also amended the monitoring requirements of discharge point W1 in table S3.3 from daily to weekly. This had been already agreed between NRW area and the operator in 2018 (letter and compliance report) which recommended that this change integrated into the permit when during a variation.

The operator had agreed with the change made to the permit.

Operational Changes

There has been no operational changes as part of this variation.

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

Existing MCPs/SGs are already listed in Table S1.1 & emission points in Table S3.1. ELVs and monitoring for existing MCPs & SGs 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.

There are three existing MCPs. The existing MCPs are natural gas boilers, two having thermal input of 3 MWth (commissioned 2010) and the other having a thermal input of 4.5 MWth (commissioned 2015). However these are monitored and report for NOx but

with no associated emission limit value. They were already listed in Table S1.1 and Table S3.1 therefore no changes have occurred during this permit variation.

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”.

There are no direct emissions to surface water of process effluent, there is a direct discharge to surface water of uncontaminated surface water. All process water is treated on the on-site effluent treatment plant then discharged to foul sewer under a trade effluent consent. As the process effluent is being discharge to sewer under a trade effluent consent we consider this an indirect discharge as undergoes further treatment. As per Table 1 in BAT 12 of the BREF Document the BAT-AELs only apply to direct discharges to a receiving water body, therefore no BAT-AELs are applicable to the indirect discharge of process effluent. We do not consider the BAT-AELs are applicable to the direct discharge of uncontaminated surface water.

As per BAT 4 of the BREF Document and taking consideration of Footnote 2 the only potential applicable monitoring for an indirect discharge would be Chloride monitoring. Monitoring for all other parameters is not required in the case of an indirect discharge.

We do not consider Chloride monitoring is required for this particular sector in line with the UK Regulator's Interpretation Document.

Therefore in conclusion, there is no changes to emission limit values or monitoring requirements for point source emissions to water and sewer in the current permit due to this BREF review.

Emissions to Water – Article 15(4) Derogations

No derogations

Emissions to Air

There were no changes to the Emission Limit Values (ELVs) for emissions to air this is because the only potentially applicable BAT-AEL for channelled emissions to air for this sector is from meat smoking (BAT 29). There is no meat smoking taking place at the site therefore the BAT-AEL in BAT 29 is not applicable. Therefore there is no changes in the current ELVs on the permit due to the BREF review. As per BAT 5 of the BREF Document The only applicable monitoring is from smoke chambers. There are no smoke chambers at the site therefore there is no applicable monitoring as per BAT 5.

Therefore in conclusion, there is no changes to emission limit values or monitoring requirements for point source emissions to air in the current permit due to this BREF review.

Emissions to Air – Article 15(4) Derogations

No derogations

Other IED BREFs relevant to the permit review

There is a Section 5.4 activity listed within Table S1.1 of the permit relating to the Effluent Treatment Process of process effluent from the main activity. We consider this activity to be covered by the BAT conclusions with the Food, Drink and Milk BREF and therefore no additional assessment has been completed against the Waste Treatment BREF.

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 Operator current uses EMS that is externally accredited to Green Dragon Environmental Standard Level 5 (highest standard)
	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;	Currently compliant Operator current uses EMS that is used to Green Dragon Environmental Standard Level 5 (highest standard)
	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 6
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 current uses EMS that is used to Green Dragon Environmental Standard Level 5
	I.(b)	descriptions of process-integrated techniques and waste water/waste gas treatment techniques to prevent or reduce emissions, including their performance	
	II.	Information about water consumption and usage and identification of actions to reduce water consumption and waste water volume (BAT 7)	
	Information on quantity and characteristics of the waste water streams, such as:		
III.(a)	Average values and variability of flow, pH and temperature		

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		Currently Compliant- Operator current uses EMS that is externally accredited to Green Dragon Environmental Standard Level 5 (highest standard)
	Information on characteristics of waste gas streams, such as:			
	IV.(a)	Mean and variability of:		
		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		Currently compliant operator currently monitors for pH, Chemical oxygen demand, Fat Oil and Grease (FOG) and suspended solids (SS)
	pH		
	Temperature		
	Key monitoring locations		
	Pre-treatment inlet and/or outlet		Currently compliant
	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:		Currently compliant/ Not applicable- no direct discharge to surface water as all process water discharge to sewer. However permit already has monitoring standards EN 872 for suspended solids (BAT 4 compliant) and BS 6068 for COD as monitoring requirements for sewer discharge.
	Refer to monitoring emissions to water table in BRef document		
5	Refer to monitoring emissions to air table in BRef document Monitoring parameters depend on sector		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
			BS EN 14792 for NOx monitoring already in place in permit version V005. There are no other emissions parameters applicable to the site
6	Energy Efficiency: BAT is to use 6a and appropriate combination of common techniques		
	a.	Energy Efficiency Plan	Currently compliant Operator has energy efficiency plan under EMS
	b.	Use of common techniques	Currently compliant Operator has stated that they employ
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 Process water is not recycled due to hygiene use but the operator has stated that the site has applied BAT 7a-e 7g and 7 i-k.
	b.	Optimisation of water flow	
	c.	Optimisation of water nozzles and hoses	
	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	

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
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
	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	
		Compliant in the future Operator has stated that site uses ammonia for majority of cooling and the operator considers the global warming potential of all refrigerants However the operator has stated that HFCs are used (at minimum). The operator will need to demonstrate how they intend to replace equipment that uses HFC with alternative substances with lower GWP.
10	Increase resource efficiency, use one or a combination of the techniques given below	
	a.	Anaerobic digestion
	b.	Use of residues
	c.	Separation of residues
	d.	Recovery and reuse of residues from pasteuriser
	e.	Phosphorus recovery as struvite
Currently Compliant- all food waste is sent for anaerobic digestion (BAT 10 a)		

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
	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 direct discharge to surface water. All process water discharge to sewer
12	Reduce emissions to water, use an appropriate combination of the techniques given below		Currently compliant Operator has stated BAT 12 a (Equalisation), b (Neutralisation),c (Physical Separation and j (Coagulation and flocculation) are used on site. There is no direct discharge of process effluent to surface water. All process water is treated at the effluent treatment plant and is discharged to sewer.
	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.		
	Chemical oxygen demand COD	25–100 mg/L	Not applicable- all process water is discharged to sewer and therefore considered an indirect emission.

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
	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:			
	I.	A protocol containing actions and timelines		Not applicable Noise is not an issue with this site. Site located in an industrial area with no nearby sensitive receptors.
	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:			
	a.	Appropriate location of equipment and buildings		Currently compliant- Applicant currently uses BAT 14 b-d at their site
	b.	Operational measures – see examples		
	c.	Low-noise equipment – see examples		
	d.	Noise control equipment – see examples		
	e.	Noise abatement – see examples		
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		Not applicable
	II.	Odour monitoring protocol		

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.	Odour complaint response plan/protocol		Odour is not an issue with this site. Site located in an industrial area with no nearby sensitive/residential receptors
	IV.	Odour prevention and reduction programme		
BAT CONCLUSIONS FOR THE FRUIT AND VEGETABLE SECTOR				
27	In order to increase energy efficiency, BAT is to use an appropriate combination of the techniques specified in BAT 6 and to cool fruit and vegetables before deep freezing.			
Indicative	Indicative environmental performance levels for specific energy consumption Table 12 and footnotes			
	Potato processing (excluding starch production)	1.0-2.1 MWh/tonne of products		Not applicable-Process not done on this site
	Tomato processing	0.15-2.4 MWh/tonne of products		Not applicable - Process not done on this site
Indicative	Indicative environmental performance levels for specific waste water discharge Table 13 and footnotes			
	Potato processing (excluding starch production)	4.0-6.0 m³/tonne of products		Not applicable-Process not done on this site
	Tomato processing	8.0-10.0 m³/tonne of products		Not applicable Process not done on this site
BAT CONCLUSIONS FOR MEAT PROCESSING				
Indicative	Indicative environmental performance levels for specific energy consumption Table 16 and footnotes			
	0.25 – 2.6 MWh/tonne of raw materials			Not applicable - Limits do not apply to ready meal production as per footnote 1 in table 16 (BRef Document)

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 environmental performance levels for specific waste water discharge Table 17 and footnotes			
	1.5 – 8.0 m³/tonne of raw materials		Not applicable - Limits do not apply to ready meal production as per footnote in table 17 (BRef Document)	
29	Reduce channelled emissions of organic compounds to air from meat smoking, use one or a combination of the techniques given below			
	a.	Adsorption		Not applicable Meat smoking not done on site
	b.	Thermal oxidation		
	c.	Wet scrubber		
	d.	Use of purified smoke		
	BAT-AEL for channelled TVOC emissions to air from a smoke chamber Table 18 and footnotes, associated monitoring is given in BAT 5			
	TVOC	3 – 50 mg/Nm³		Not applicable - Meat smoking not done on site

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

Not Applicable