

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 Llansantffraid Mill in Llansantffraid Ym Mechain operated by Wynnstay Group P.L.C.

The permit number is EPR/WP3938SH.

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 Llansantffraid 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 Llansantffraid 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 19/12/2005 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 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 28/10/2020 and additional information received via E-mail on 22/09/2021.

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 provided no response with regards to this request contained within the Regulation 61(1) Notice; therefore an improvement condition has been set in the consolidated 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.

IC7	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
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 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
IC9	(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)

IC7 has been set as the Operator did not provide any response regarding this request in the Regulation 61(1) Notice. IC8 has been set as the Operator stated Not Applicable to BAT Conclusion 2, we do not agree as there are waste gas streams from the installation.

Capacity creep

We have included an improvement condition (IC9) 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 improvement conditions table to detail which existing improvement conditions are now complete. We have updated the operating techniques table to incorporate any amended or new operating techniques now in use since the permit was issued in 2005. We have corrected the primary listed activity on the permit, it was previously listed as Section 6.8 Part A(1)(d)(i) this has been changed to the correct activity Section 6.8 Part A(1)(d)(ii), it is considered the previous listed activity was incorrect in the permit, there has been no change in the activity at the site.

The site plan has been amended in the permit as the original site plan was incorrect. An accurate site plan was provided for the Operator.

Operational Changes

There has been no operational changes at the site during the variation.

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

The installation has confirmed there is one existing MCP, this is already listed in Table S1.1 as a Directly Associated Activity and with emission point (A1) in Table S3.1. There is also a back-up combustion unit however the Operator has not confirmed the MWth input of this back-up unit therefore we cannot confirm if it is subject to MCPD. The existing MCP are gas oil boiler, 1.83 MWth input. 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 installation has one discharge to surface water (River Cain) of uncontaminated surface water run off and one discharge to foul sewer (Severn Trent Sewer) of vehicle wash water and boiler blow down, these are discharged under a Trade Effluent Consent issued by the sewerage undertaker. There is no process effluent associated with the discharge to foul sewer originating from the milling processes therefore we do not consider it necessary for the Operator to complete the screening tests.

The specific BAT Conclusions and BAT-AELs for water emissions were also reviewed based on the Food, Drink and Milk BREF, as there is no process effluent associated with either discharges we consider no BAT-AELs apply.

Emissions to Water – Article 15(4) Derogations

No derogations.

Emissions to Air

There were changes to the ELVs for emissions to air taking into account BAT conclusions from the Food, Drink and Milk BREF, specifically BAT Conclusion 17. Emission Point A6 is not subject to the BAT-AEL as it is not specifically related to pellet cooling or grinding. There is no grain milling carried out on site.

Effective until 3 December 2023:

Release point	Parameter	Limit / BAT-AEL	Effective until
A3	Particulate matter	50 mg/m ³	3 December 2023
A4	Particulate matter	90 mg/m ³	
A5	Particulate matter	50 mg/m ³	
A6	Particulate matter	35 mg/m ³	
A7	Particulate matter	No limit set	

Effective from 4 December 2023

Release point	Parameter	Limit / BAT-AEL	Effective from
A3	Particulate matter	20 mg/Nm ³	4 December 2023
A4	Particulate matter	20 mg/Nm ³	

A5	Particulate matter	20 mg/Nm ³	
A6	Particulate matter	35 mg/Nm ³	
A7	Particulate matter	10 mg/Nm ³	

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. The Operator has confirmed they are able to comply with all applicable BAT-AELs and have demonstrated this using previous monitoring data.

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
	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;
		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.

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 Not Applicable, 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 waste water streams of process effluent. Only waste water streams are: (i) Uncontaminated surface water run off (ii) Vehicle wash water and boiler blow down
	Information on characteristics of waste gas streams, such as:		
	IV.(a)	<i>Mean and variability of:</i>	Compliant in the future The Operator has stated Not Applicable, we do not agree as there are waste gas streams arising from the installation. Therefore, improvement condition has been set.
		Flow	
		temperature	
	IV.(b)	<i>Mean concentration, load and variability of relevant substances:</i>	
		Dust	
		TVOC	
		CO	
		NOx	
		SOx	
	IV.(c)	<i>Presence of other substances that may affect the waste gas treatment system or plant safety:</i>	
		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)	Currently Compliant The Operator has stated energy consumption and raw materials use is recorded on their energy management system. They measure their performance using Key Performance Indicators. See BAT6 and BAT10 for more detail.

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
	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 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).	Currently Compliant The Operator has stated the monitoring strategy is defined within their energy management system, water audits and waste audits. The permit requires monitoring and trending of energy, water and raw materials.
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 There are no emissions to water of process effluent there are the two following waste water streams: (i) Uncontaminated surface water run off to River Cain (ii) Vehicle wash water and boiler blow down to foul sewer
	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:		
	Refer to monitoring emissions to water table in BRef document		Not Applicable No emissions of process effluent – see above.
5	Refer to monitoring emissions to air table in BRef document		Currently Compliant The Operator already completes monitoring of particulate matter from their pellet cooling and grinding process emission points on an annual basis to EN standard. There is no grain milling carried out on site.
	Monitoring parameters depend on sector		

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
6	Energy Efficiency: BAT is to use 6a and appropriate combination of common techniques	
	a.	Energy Efficiency Plan
	b.	Use of common techniques
Currently Compliant The Operator has an energy efficiency plan in place which includes specific energy consumption, setting of KPIs (yearly targets for reduction in specific energy usage) improvements planning, recorded and monitored via environmental improvement programme.		
Currently Compliant The Operator has stated the following techniques are in place: • Boiler maintenance schedule and records • Energy efficient motors replace any motors requiring replacement • When requiring replacements, LED lighting is used • Pipes are lagged and leaks repaired including steam pipes • Process control systems in place • Air plant maintenance standard operating procedures with annual surveys carried out • Solar panels in use on warehouse roof • Inverters on the grinder (variable speed drives)		
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
	b.	Optimisation of water flow
Not Applicable The Operator has stated there is no waste water produced in the production process therefore there is no opportunity for water reuse or recycling.		
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 there is no waste water produced in the production process. Cleaning is mostly dry cleaning using vacuum cleaning for air lines. Pressure washer is used for external cleaning. There is a standard operating procedure in place which requires cleaning to be done as soon as possible. Uncontaminated surface water and foul sewer are segregated.
	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:		Currently Compliant The Operator has stated cleaning is mostly dry cleaning. Use of hypochloride and Jeyes fluid is minimal only as and when required.
	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		Not Applicable No refrigerants in use.
10	Increase resource efficiency, use one or a combination of the techniques given below		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.
	a.	Anaerobic digestion	
	b.	Use of residues	
	c.	Separation of residues	
	d.	Recovery and reuse of residues from pasteuriser	
	e.	Phosphorus recovery as struvite	

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 process waste water generated.
12	Reduce emissions to water, use an appropriate combination of the techniques given below		
	a.	Equalisation	Not Applicable No process waste water generated.
	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 No process waste water generated.	

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:			Compliant in the future The Operator has stated that no noise complaints have been received however due to the proximity of residential receptors an amended Noise Management Plan will be implemented incorporating all of these aspects.
	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 techniques are in place: - Maintenance of all bearings on equipment is carried out - All staff suitably trained and experienced - Doors by blending, bulk outloading and packing are kept closed - Intake of minerals is only carried out during normal working hours - Grinder house is soundproofed
	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		
ODOUR				

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
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
	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
	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
	b.	Recycling of waste gas from the dryer
	c.	Use of waste heat for predrying
Indicative	Indicative environmental performance levels for specific waste water discharge Table 3	
	Wet pet food	1.3 – 2.4 m ³ /tonne of products
17	Reduce channelled dust emissions to air, use one of the techniques given below:	
	a.	Bag filter

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
	b.	Cyclone		Emission points A3, A4, A5 are related to pellet cooling and have cyclone abatement systems fitted. Emission point A7 is related to grinding and has a fabric filter (bag filter fitted). Emission point A6 is a dust suppression system via a cyclone and fabric filter (bag filter) abatement system.
	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	Currently Compliant Emission point A7 is from grinding. The Operator has confirmed they are already compliant with the BAT-AEL 10 mg/Nm3 for existing plant referencing previous monitoring data as evidence. Upper end of BAT-AEL range will be implemented in the permit from 2023.
	Dust – Pellet cooling	< 2–20 mg/Nm³		Currently Compliant Emission points A3-A5 are from pellet cooling. The Operator has confirmed they are already compliant with the BAT-AEL 20 mg/Nm3 for existing plant referencing previous monitoring data as evidence. Upper end of BAT-AEL range will be implemented in the permit from 2023.

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

Not Applicable.