

Natural Resources Wales permitting decisions

Lloyd's Animal Feeds (Western) Limited (Wrexham Mill)

Decision Document

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Variation

The variation number is:	EPR/AB3492ZQ/V002
The operator is:	Lloyd's Animal Feeds (Western) Limited
The Installation is located at:	Wrexham Mill, Bridge Rd North, Wrexham Industrial Estate, Wrexham, LL13 3PS

We have decided to issue the variation for Wrexham Mill operated by Lloyd's Animal Feeds (Western) Limited.

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.

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

Key issues of the decision

Receipt of Application

The application for variation was accepted as duly made on 15 February 2019. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

Consultation

No consultation has been carried out as this is a minor technical variation. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

Operator

The operator is unchanged by this permit application and determination.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

- S6.8 Part A (1)(d)(ii) Treatment and processing of vegetable raw materials whether previously processed or unprocessed, intended for the production of feed with a finished product production capacity greater than 300 tonnes per day.
- Directly Associated Activities:

Steam Generation: 3.65MWh gas boiler to supply process of listed activity

Raw Material Storage & Handling: Material intake, storage, bulk tanks and warehouse serving listed activity

Finished Product Storage: product bins, out loading bays and bagging plant serving listed activity

Proposed Changes

This variation will allow annual capacity of the plant to increase from 185,000t/yr to 225,000t/yr. There are no planned changes to the product range, raw materials used or processes. Increase in capacity will be achieved by reducing down time between batches and improving processes to facilitate higher throughput rates. Although total amount of particulate emissions will likely increase, the in line emission monitoring and cyclone efficiencies will keep the installation below emission limits at all times. Achieving higher throughput by reducing down time means the installation will remain within current ELV limits for particulate matter (30mg/m³/hr), as hourly throughput is unlikely to change. There will be changes to the site layout, consisting of 2 new 250t raw material bins, a new warehouse (approximately 40 x 25m with a pitched roof height of 14m), 4 additional out-loading bins and modifications to the main gas supply to facilitate the location of the new warehouse.

All emission points are of the same dimensions and locations.

The site boundary has not changed as a result of this variation.

Legislation

NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

All applicable European directives have been considered in the determination of the application.

Biodiversity, Heritage, Landscape and Nature Conservation

A full assessment of the application and its potential to affect the sites was carried out during the initial permit application phase as part of our determination process. We do not consider that the impact of the Installation on the identified sites will change as a result of this variation, therefore additional assessment is not required.

Environmental Risk Assessment

Air

There is no change to sources of emissions to air as a result of this variation.

The air impact assessments and dispersion modelling completed in 2017 do not require updating.

Emission limits

There are no changes to the existing emission limit of 30mg/m³/hr for particulate matter. The increase in tonnage limit resulting from this variation will be achieved by reducing downtime between batch cycles, not by increasing hourly throughput. Therefore, this variation will not likely affect the hourly average so the installation will remain well below this limit.

The site has continuous in line monitoring using probes installed in the flue after the cyclones. Alarms will shut down the plant if the permitted level of particulate emissions is reached.

Water

Surface water drainage

There is no change to surface water drainage emission points as a result of this variation.

Foul drainage

There is no change to foul drainage emission points as a result of this variation.

As a condition in the original permit, the operator is required to carry out periodic monitoring at least once every 5 years for groundwater and 10 years for soil, unless such monitoring is based on a systematic appraisal of the risk of contamination.

Odour

The applicant has submitted an Odour Management Plan subject to improvement condition IP1 in the original permit. The operator monitors emissions at their source (on site) to ensure releases do not result in impacts on odour amenity at sensitive receptors. Monitoring consists of inspection of raw materials, the manufacturing process, buildings and equipment to check that emissions are being contained and controlled.

The Odour Risk Table states that all identified odour hazards pose negligible risks to receptors.

Noise

There has been no changes to the Noise and Vibration management plan as a result of this variation.

Fugitive emissions

There are no changes to fugitive emission sources as a result of this variation.

Monitoring

There is no change to existing monitoring requirements in the permit as a result of this variation.

Reporting

There is no change to any existing reporting requirements in the permit as a result of this variation.

Environmental Management System

The operator has an Environment Management system in place, a summary of which has been provided with their application. The contents include operations, maintenance, accidents and incidents, monitoring and competence resources and training. The EMS is not accredited but the application states that the operator will develop additional systems and procedures consistent with the principles of ISO14001. The requirement for a written management system is a condition of the original permit and will be a part of regulatory activities.

Operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.

We consider that the emission limits included in the permit reflect the BAT for the installation.