



**PERMIT PPC/A/1/03.V5**

**West Lindsey District Council hereby permit Sinclair Animal and Household Care Ltd., to operate a Part B Pet Food manufacturing Process at:-**

**ROPERY ROAD, GAINSBOROUGH, LINCOLNSHIRE, DN21 2QB**

**Under the Provisions of**

**THE POLLUTION PREVENTION CONTROL ACT 1999**

**THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES)  
REGULATIONS 2010**

**SECRETARY OF STATES PROCESS GUIDANCE NOTE 6/24(13) AND  
ASSOCIATED STATUTORY GUIDANCE**

**[Consolidated permit issued with Variation Notice reference  
PPC/A/1/03.V5]**

*Public Protection Services, Guildhall, Marshall's Yard, Gainsborough. Lincs DN21 2NA*

**WEST LINDSEY DISTRICT COUNCIL**

**THE ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2010**

**THE POLLUTION PREVENTION AND CONTROL ACT 1999**

**PERMIT TO OPERATE A DRY PET FOOD MANUFACTURING PROCESS**

**PERMIT NUMBER:** PPC/A/1/03.V5

<b>Operator</b>	Sinclair Animal and Household Care Limited
<b>Installation Address</b>	Ropery Road, Gainsborough, Lincolnshire, DN21 2QB
<b>Grid Reference</b>	481214/389956
<b>Registered Office</b>	Sinclair Animal and Household Care Limited, Ropery Road, Gainsborough, Lincolnshire, DN21 2QB

Sinclair Animal and Household Limited is hereby permitted by to carry on a Pet Food Manufacturing Process under Section 6.8 Part B, Schedule 1 the Environmental Permitting (England and Wales) Regulations 2010 as described below within the installation boundary as marked red on the attached plan reference Appendix 1 and in accordance with the following conditions.

Provenance	Relevant Dates
<b>Application Received:</b>	<b>14 March 2002</b>
<b>Authorisation</b>	<b>03 September 2004</b>
<b>Varied</b>	<b>7 December 2009</b> <b>20 October 2010</b> <b>10 October 2011</b> <b>12 September 2014 (Model Permit)</b>

**Potential Releases**

The process has the potential to release offensive odour beyond the process boundary and also emissions of particulate matter. The odorous emissions are a complex cocktail of chemical species and may contain ammonia, amines, organic sulphur compounds, and VOCs.

**Description of the Installation**

A process defined in Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010 Section 6.8, Part B as a process involving the treatment and processing of animal or vegetable matter.

The activity of fish flake production at the site involves the use of various raw materials including flours, vegetable proteins; vitamin/mineral concentrates and fish meal. The raw materials are stored in sealed containers in the Raw Materials Store, as marked on Plan C (Appendix 1), which forms part of this of permit.

Working stocks are transported in sealed containers from the Raw Materials Store to the Raw Material Working Stock Areas, as marked on Plan C (Appendix 1), within the process building.

The raw materials are mixed with hot water in the mixing tank, shown on Plan C (Appendix 1), to form, a slurry. The warm slurry is then pumped to one of two flaking machines, shown on Plan C (Appendix 1). The flaking machines comprise of steam heated rollers capable of treating the flake at 105°C for 15 seconds. The steam heated rollers are fed by a gas fired boiler, as marked on Plan C (Appendix 1).

The flakes are scraped from the rollers and placed in plastic tote boxes and transported from the process building to the Bulk Flake Storage area, as marked on Plan C (Appendix 1). The various formulations of flakes are then blended together to make the finished products prior to packing.

In order to minimise the release of offensive odours to atmosphere from the process, fumes from the two flaking machines and the process building pass through a wet scrubber.

The Prescribed Process itself cannot emit particulate matter as emissions are passed through a water spray to remove a large proportion of organic matter (and then flushed to drains) before passing through the wet chemical scrubber.

Ancillary processes include the dry blending of ingredients which includes dispensing and ribbon blending the ingredients. This is performed under a dedicated extraction system which has micro-fine filters in line to prevent particles from being emitted to atmosphere. The cleaning of these filters is performed by the system itself on a cyclical basis by "shaking down" into sealed drums, the contents of which are disposed of by double bagging and placed in a skip which is subsequently removed by a licenced waste contractor.

## Permit Conditions

1. The operator shall:
  - prevent offensive odour beyond the site boundary as perceived by the regulator
  - contain processing operations within a building and prevent the release of uncontrolled emissions
  - extract odorous air
  - treat extracted air in odour abatement plant
  - maintain a written odour response plan

### **Emissions**

2. There shall be no offensive odour beyond the site boundary as perceived by the regulator. It shall not be a breach of this condition in a particular case if the operator can show that they took all reasonable steps and exercised all due diligence to prevent the release of offensive odour.
3. No visible particulate matter shall be emitted beyond the installation boundary.

### **Buildings, ventilation**

4. Buildings containing processing operations shall:
  - prevent the uncontrolled release of air from raw materials receipt, processing and storage.
  - maintain a negative pressure inside raw materials reception and storage areas of the building
  - have a designated area for loading raw material wastes into vehicles, and shall collect air and exhaust it to the odour abatement plant;
  - personnel doors shall be self-closing

### **Odour abatement plant**

5. The operator shall ensure that:
  - All contaminated air from the process building shall pass through the wet scrubber
6. The odour abatement equipment shall be inspected not less than once a day for at least the following:
  - leaks or blockages in air handling equipment, ductwork and abatement equipment and;
  - continuous monitors for abatement equipment

**Processing**

7. Process tanks and vessels shall:
- be loaded to minimise spillage and disturbance to materials; and
  - have emissions captured and collected, which shall be fully enclosed and fitted with level indicators.

**Wastes capable of causing an odour**

8. Waste shall be removed frequently and at least once a week. When waste is moved between buildings, and when it is outdoors, it shall be in sealed containers.

**Other bulk, loose, dry material - storage and loading and transport around site**

9. Dusty materials (including dusty wastes) shall only be stored in food store area and their storage and transfer shall be subject to suppression and management techniques to minimise dust emissions. No potentially dusty materials (including wastes) shall leave the site other than by use of enclosed skips and removed off site by approved licensed contractors.

**Monitoring provisions**

10. The emission requirements and methods and frequency of monitoring set out in Table 1 shall be complied with. Sampling shall be representative.
11. All continuous monitors fitted to show compliance with the permit shall be fitted with an audible alarm warning of abatement failure or malfunction. They shall activate when emissions reach 75% of the relevant emission limit in Table 1 and record automatically each activation. Details of the problem shall be recorded in the logbook. Alarms shall be tested at least once a week.
12. The operator shall, in the case of abnormal emissions, inform the regulator without delay if there is an emission likely to have an effect on the local community.
13. Any monitoring display required for compliance with the permit shall be visible to operating staff at all times whilst in the scrubber room. Corrective action shall be taken immediately if any periodic monitoring result exceeds a limit in Table 1, or if there is a malfunction or breakdown of any equipment which might increase emissions. Monitoring shall be undertaken or repeated as soon as possible thereafter and a brief record shall be kept of the main actions taken.
14. All plant and equipment capable of causing, or preventing, emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturer's instructions.

**Records and training**

15. Written or computer records of all tests and monitoring shall be kept by the operator until the next inspection, or for at least 24 months whichever is the longer. They shall be made available for examination by the regulator. Records shall be kept of operator inspections, including those for odorous emissions.

16. Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Details shall be noted in the logbook kept in accordance with Condition 15 above.

**Best available techniques**

17. The best available techniques shall be used to prevent or, where that is not practicable, reduce emissions from the installation in relation to any aspect of the operation of the installation which is not regulated by any other condition of this permit.
18. If the operator proposes to make a change in operation of the installation, he must, at least 14 days before making the change, notify the regulator in writing. The notification must contain a description of the proposed change in operation. It is not necessary to make such a notification if an application to vary this permit has been made and the application contains a description of the proposed change. In this condition 'change in operation' means a change in the nature or functioning, or an extension, of the installation, which may have consequences for the environment.

Any information required by this permit to be sent to West Lindsey District Council shall be sent to: -

Public Protection Services  
Guildhall  
Marshall's Yard  
Gainsborough  
Lincolnshire DN21 2NA

Telephone: (01427) 676676  
Fax Number: (01427) 676170  
Out of hours: (01427) 613960

Signed: 

Dated: 24th October 2014

**By Mrs L Beevers, Regulatory Team Manager, authorised by West Lindsey District Council to sign on their behalf.**

Table 1 - Emission limits, monitoring and other provisions

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Odour	Contained Lower Odour Intensity process releases	Where installed any odour arrestment plant installed on lower odour intensity emissions should have an odour removal efficiency of not less than 85% (see also notes f and g).	Determination by manual extractive sampling and analysis by dynamic olfactometry in accordance with BS EN 13725	On installation of new / replacement odour arrestment equipment (see also note 1).
<p><b>Note 1</b> - when offensive odours are detected beyond the process boundary or complaints are received and there is no obvious cause of odour release then the operator shall check the odour abatement plant performance using <b>Table 2</b> guide values and check the process operational controls. If notified by the regulator, odour removal efficiencies shall be retested.</p>					
3	Particulate matter	Emissions from contained sources	20 mg/m <sup>3</sup>	Gross filter failure device <ul style="list-style-type: none"> <li>provide audible and visual alarms</li> </ul> <p><b>plus</b></p> <ul style="list-style-type: none"> <li>extractive test</li> </ul>	annual
4	Particulate matter	Whole Site	No visible emission	Visual observations, with particular attention to areas where dust may be generated	On start-up and on at least two more occasions during the working day
5	Droplets, persistent visible emissions	All emissions to air (except steam and condensed water vapour)	No droplets, no persistent visible emissions	Visual observations	On start-up and on at least two more occasions during the working day

**Notes**

- The reference conditions for limits in Table 1 are: 273.1K, 101.3kPa, without correction for water vapour content, unless stated otherwise.
- All periodic monitoring shall be representative, and shall use standard methods.

- c) \*All periodic monitoring results shall be checked by the operator on receipt and sent to the Council within 8 weeks of the monitoring being undertaken.\*
- d) The efficiency emission limits do not apply during start-up and shut down. All emissions shall be kept to a minimum during these periods.
- e) The continuous monitoring provision should be dis-applied where emissions do not exceed  $20 \text{ mg/m}^3$  without the use of abatement plant. This should be demonstrated by a single sampling exercise undertaken in accordance with **paragraph 4.2**. A further such monitoring exercise may be required in the event of a substantial change to the process
- f) in cases where the inlet odour concentrations are very low the accepted odour arrestment plant efficiency should be either a destruction efficiency of 85% or the final discharge to air should contain less than  $200 \text{ odour units/m}^3$  (due to measurement reproducibility and plant efficiency at low concentrations).
- g) Abatement for mixed intensity odour should have an emission limit calculated using mass flow of odour units.



Table 2 - Odour abatement plant - Indicative guide provisions for monitoring

Type of Odour abatement plant	Indicative Guide Substance and Value	Type of monitoring	Monitoring frequency
Scrubbing equipment	• pH	Monitor and alarms (audible and visual)	Continuous Record daily
	Alternative parameter is the measurement of Chemical Oxygen Demand (COD)	Monitor and record to establish optimum operating levels	Record daily

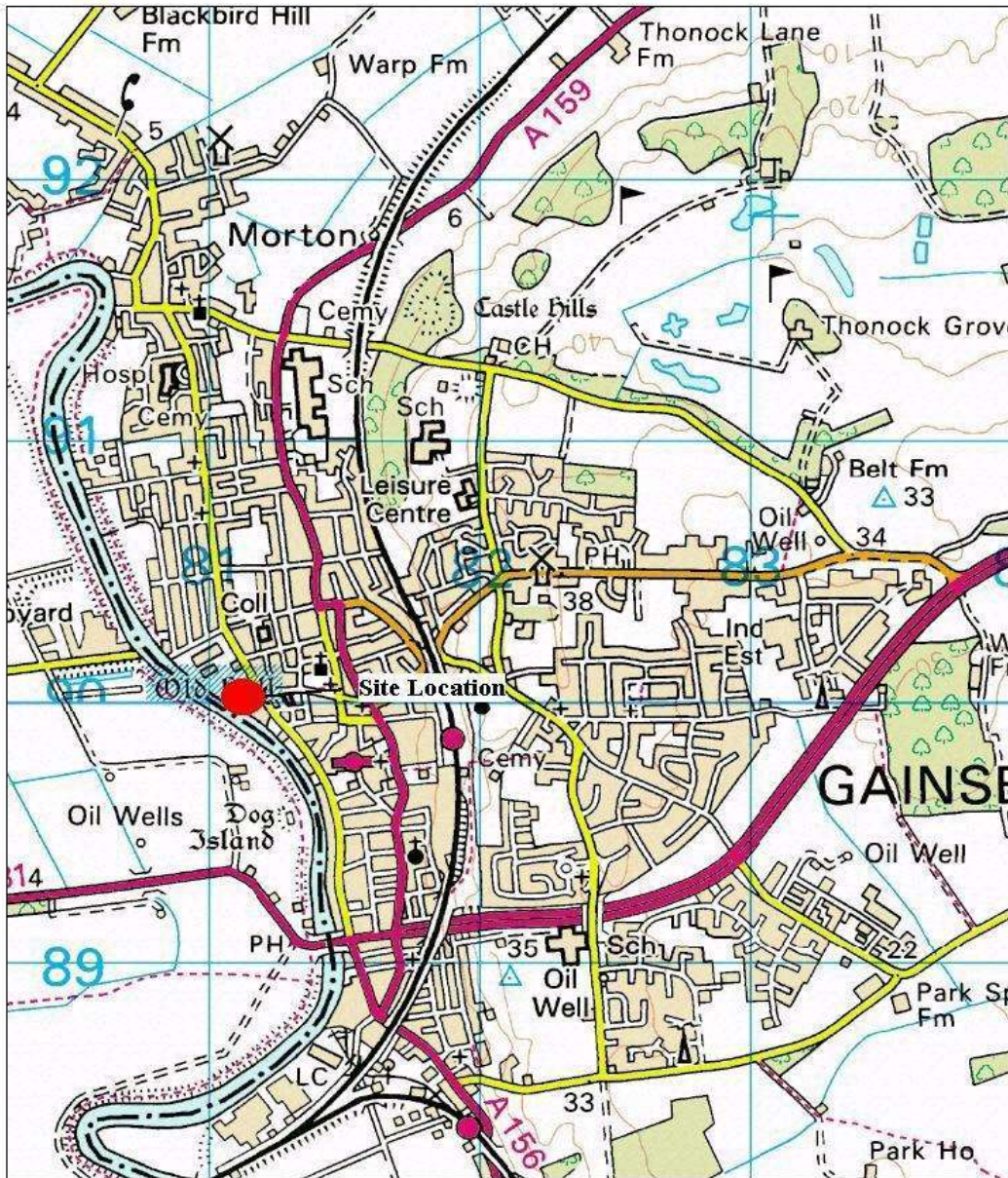
**Notes**

a) Testing of odour abatement plant should be carried out, if possible, when the process is being operated at peak production

# APPENDIX 1

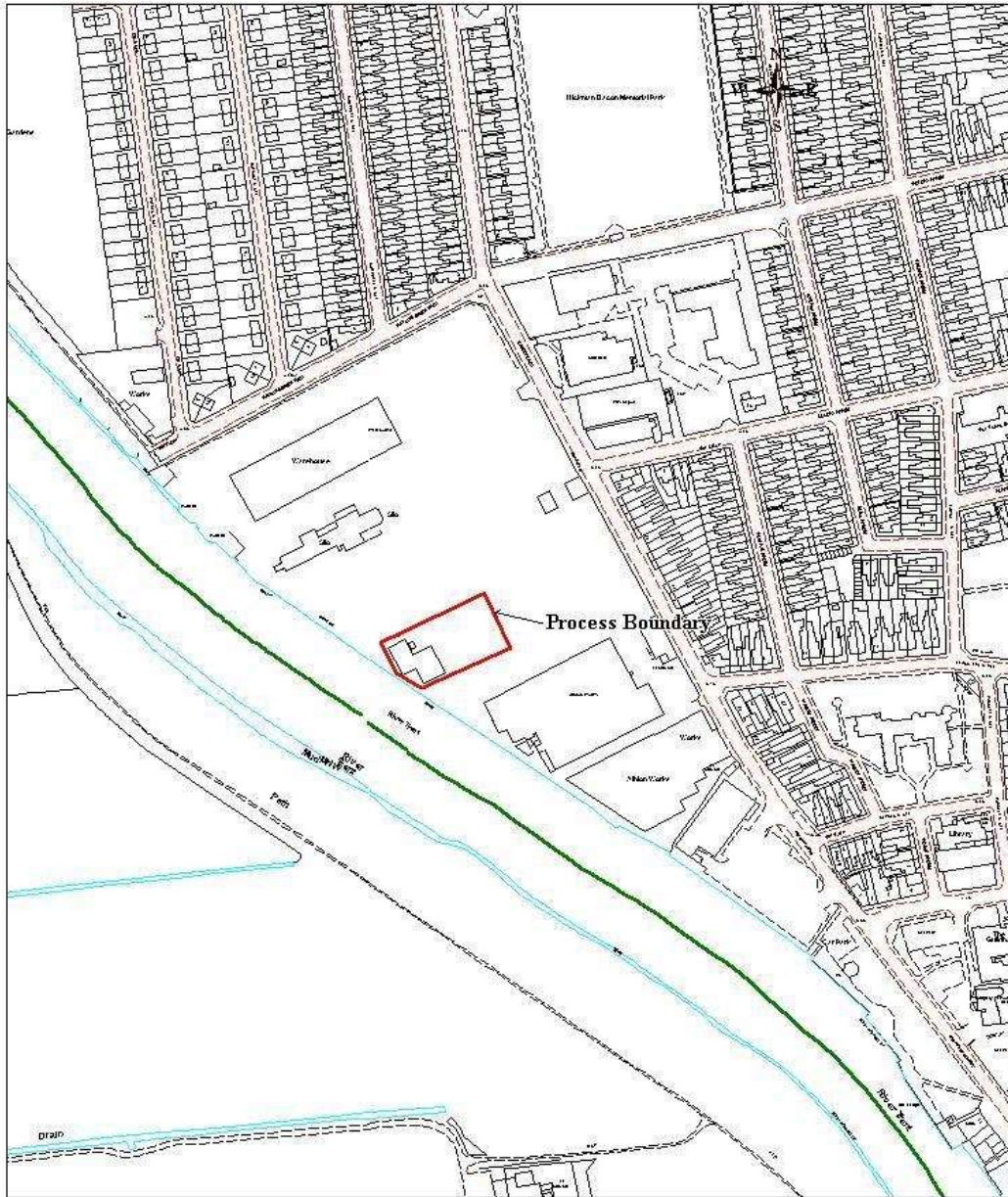


Plan A



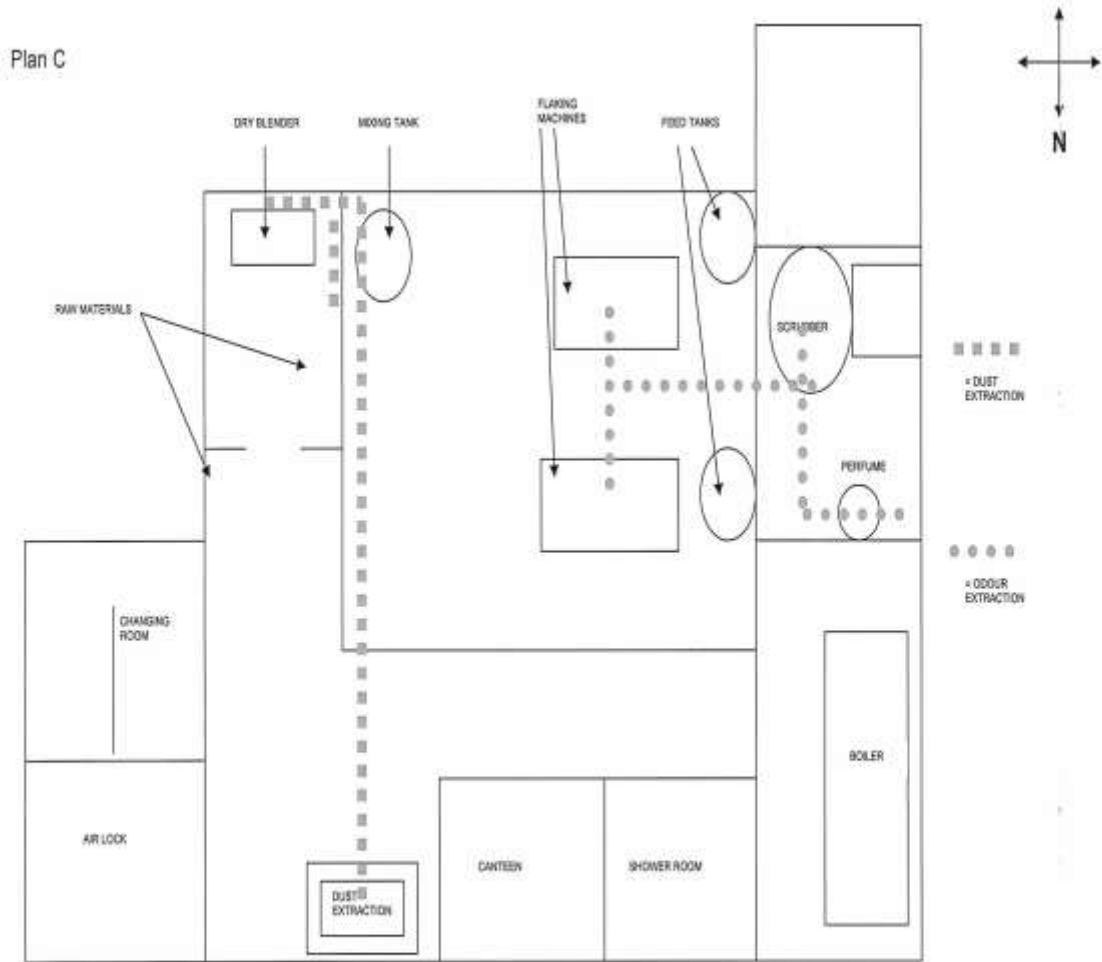
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Plan C Appendix 1



## Explanatory Notes

This note does not comprise part of the Permit but contains guidance relevant to the permit.

### **Inspections**

Regular inspections will be made by officers of Council (without prior notice), in order to check and ensure full compliance with this permit.

### **BAT (Best Available Techniques) and Implied General BAT Conditions**

Best Available Techniques (BAT) is defined in regulation (3(1) of the Pollution Prevention and Control (England and Wales) Regulations 2000 (the Regulations), as the most effective and advanced stage in the development of activities and their methods of operation which indicates the practical suitability of particular techniques for providing in principle the basis for emission limit values designed to prevent and, where that is not practicable, generally to reduce emissions and the impact on the environment as a whole; and for the purpose of this definition—

- (a) “available techniques” means those techniques which have been developed on a scale which allows implementation in the relevant industrial sector, under economically and technically viable conditions, taking into consideration the cost and advantages, whether or not the techniques are used or produced inside the United Kingdom, as long as they are reasonably accessible to the operator;
- (b) “best” means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole;
- (c) “techniques” includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Under Regulation 12(10 – 11), there is also an implied (residual) duty on the operator to use BAT to prevent or reduce emissions, even if not covered by a specific condition of this permit. This is intended to cover the most detailed level of plant design and operation, where the operator will be in the best position to understand the pollution control means for an installation practice. Implied BAT can also cover more basic ‘unconditioned’ aspects, such as bonfires, the keeping of essential spares, and good housekeeping for example.

### **Health and Safety at Work and Other Statutory Requirements**

This permit is issued under the Environmental Permitting (England and Wales) Regulations 2010, the responsibilities and duties you have under legislation for health, safety, and welfare in the workplace remain in force. Neither does the permit detract from any other statutory requirement including the need to obtain planning permission, hazardous substances consent, discharge consents from the Environment Agency, building regulations approval or a waste management licence.

## **Notification of Operation Changes**

Operators are advised that they may be liable to prosecution if they make a change to the operation **without approval**, which is such that either the operation (as changed) is not the operation which is permitted, or a condition of the permit is not being complied with as a result of the change being made. Changes to an operation can be classified as 'change in operation' or 'substantial change in operation'.

### **Substantial change to all installations (Article 3(9) and 63) of Industrial Emissions Directive 2010/75/EC**

**'Substantial change'** means a change in the nature or functioning, or an extension, of an installation which may have significant negative effects on human health or the environment.

**Re-verify compliance:** following a substantial change, compliance must be re-verified

### **Substantial change to existing installations**

**'Existing installation'** means an installation in operation on 29 March 1999 or which was granted a permit before 1 April 2001 or the operator of which submitted a complete application for a permit before 1 April 2001, provided that that installation was put in operation no later than 1 April 2002:

**'Substantial change' additional meaning** - a **change** of the maximum mass input of organic solvents by an **existing installation** averaged over 1 day, where the installation is operated at its design output under conditions other than start-up and shut-down operations and maintenance of equipment, shall be considered as **substantial** if it leads to an increase of emissions of volatile organic compounds of more than:

- a) 25 % for an installation carrying out activities with a solvent consumption of less than 15 tonnes per year;
- b) 10 % for all other installations

A full explanation of the terms 'change in operation' and 'substantial change', together with an explanation of the notification procedures is contained in the following document:-

Secretary of State's Guidance - General Guidance Manual on Policy and Procedures for A2 and B Installations.

That is all available from Her Majesty's Stationery Office (HMSO), Publications Centre, P.O. Box 276, London, 5W8 5BT. Telephone 0171 873 9090 or via Defra's Website

<http://www.defra.gov.uk/publications/2011/05/12/pb13524-ep-general-guidance/>

## **ENFORCEMENT**

The operator will be liable to enforcement action where: -

- a) the operator fails to comply with or contravene a permit condition;
- b) a change is made to the installation operation without prior notification of the change to West Lindsey District Council;

c) intentional false entries are made in any record required to be kept under the conditions of the permit;

d) false or misleading statement is made, without reasonable excuse, in relation to the operation and permit.

### **Right to Review, Update or Vary this Permit**

This permit shall be subject to review at intervals not exceeding eight years from the date it is granted. It may also be reviewed and/or varied at the discretion of West Lindsey District Council in case of changes in law or accepted standards of technology. These reasons are not exclusive.

### **Annual Subsistence Charge**

The current annual subsistence charge for this operation per annum commencing on the 1st. April each year and shall be subject to any statutory revision of the charge.

### **Appeal against Permit Conditions.**

Anyone who is aggrieved by the conditions attached to a permit can appeal to the Secretary of State for the Environment. Appeals must be sent to the Secretary of State no later than **6 months** from the date of the decision (normally the date on the bottom of the permit). You will normally be expected to pay your own expenses during the appeal.

There are no charges for appealing and there is no statutory requirement to submit an appeal form. However, an appeal form has been prepared and is available for use on the [Planning Inspectorate website](#). For an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide all of the following Regulations Schedule 6, paragraph 2(2)):

- Written notice of the appeal
- statement of the grounds of appeal
- statement indicating whether the appellant wishes the appeal to be dealt with by written representations procedure or at a hearing - a hearing must be held if either the appellant or local authority requests this, or an appointed person or the Secretary of State/Welsh Ministers decide to hold one (appellants must copy the above three items to the local authority when the appeal is made)
- a copy of any relevant application
- a copy of any relevant permit
- a copy of any relevant correspondence between the appellant and the regulator
- a copy of any decision or notice, which is the subject matter of the appeal.

Appeals relating to operations in England should be sent to the Planning Inspectorate, Environment Team, Major and Specialist Casework, Room 4/04 Kite Wing, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN.

Guidance on the appeals procedures can be found at



[http://www.planningportal.gov.uk/uploads/pins/environmental\\_permitting\\_guidance\\_notes.pdf](http://www.planningportal.gov.uk/uploads/pins/environmental_permitting_guidance_notes.pdf)

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal should inform the Secretary of State that this has been done. Further information can be found on the Planning Inspectorate website:

<http://www.planningportal.gov.uk/planning/countryside/environmental/environmentalpermitting>

**Please note:**

An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with.

In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the local authority either to vary any of these other conditions or to add new conditions.

You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence, if prosecuted, in a Magistrates Court is £50,000 and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment.

Our enforcement of your permit will be in accordance with the [Regulators' Compliance Code](#)