MALDON DISTRICT COUNCIL

Environmental Permit

Pollution Prevention and Control Act 1999
Environmental Permitting (England and Wales) Regulations 2010

Activity address:	Kevin Nash Group PLC 18-22 Burnham Business Park Springfield Road Burnham-on-Crouch Essex CM0 8TE
Operator:	Kevin Nash Group PLC 1 Nelson Street Southend-on-Sea Essex SS1 1EG
Permit reference:	MLD/EPR/B/008

Permit Issued by:

Environment Services
Maldon District Council
Princes Road
Maldon
Essex
CM9 5DL

Telephone: (01621) 875817
Fax: (01621) 875899
Email: contact@maldon.gov.uk
Website: www.maldon.gov.uk

The Address for all correspondence in relation to this Permit

Contents

Status log

Detail	Date	Comment
Application Received	*24th December 2015*	*Duly made*
Draft Permit	*14th July 2016*	*Draft Permit V0.1*
Draft Permit	*3rd August 2016*	*Draft Permit V0.2*
Permit	*18th August 2016*	*Permit V1.0*

Introductory Note

This introductory note does not form part of your Environmental Permit conditions, however it does provide useful information about your obligations under the Environmental Permitting Regulations:

The following Permit is issued under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2010 (S.I 2010 No.675), ("the EPR") to operate a scheduled installation carrying out activities covered by the description in section 6.8B(a) of Part 2 to Schedule 1 of the EPR, to the extent authorised by the Permit.

Conditions within this Permit detail Best Available Techniques (BAT), for the management and operation of the installation, to prevent, or where that is not practicable, to reduce emissions.

In determining BAT, the Operator should pay particular attention to relevant sections of the LAPPC Process Guidance notes PG6/19(13), PG6/24(13), PG6/24(13), and any other relevant guidance. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Note that the Permit requires the submission of certain information to the Regulator, and in addition, the Regulator has the power to seek further information at any time under Regulation 60 of the EPR Regulations provided that the request is reasonable.

Public Registers

Information relating to Permits, including the application, is available on public registers in accordance with the EPR. Certain information may be withheld from the public registers where it is commercially confidential, or if it is in the interest of national security to do so.

Variations to the Permit

The Regulator may vary the Permit in the future, by serving a variation notice on the Operator. Should the Operator want any of the conditions of the Permit to be changed, a formal application must be submitted to the Regulator (the relevant forms are available from the Regulator). The Status Log that forms part of this introductory note will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Transfer of the Permit or part of the Permit

Before the Permit can be wholly or partially transferred to another Operator, an application to transfer the Permit has to be made jointly by the existing and proposed Operators. A transfer will not be approved if the Regulator is not satisfied that the proposed Permit holder will be the person having control over the operation of the installation, or will not comply with the conditions of the transferred Permit. In addition, if the Permit authorises the Operator to carry out a specified waste management activity, the transfer will not be approved if the Regulator does not consider the proposed Permit holder to be a 'fit and proper person' as required by the EPR.

Talking to us

Please quote the permit number if you contact the Regulator about this permit. To give a notification under any permit condition, please use the contact details on the cover of this permit.

Description of the installation and regulated activity

This description of the installation and the regulated activity are not environmental permit conditions, however they do provide useful information about the installation and the activities undertaken. It also provides a reference point in relation to any substantial or non-substantial changes.

Kevin Nash Group PLC operates a fish bait manufacturing activity, producing 'boilies', ground baits, pellets, hook baits and bait additives.

The principal activity is boilie production. Boilies are round balls manufactured from a base mix containing both wet and dry ingredients such as semolina, rice flour, soya, egg albumin and fish meal. Flavourings and other additives are included in the mixture according to recipe.

For boilie line 1, bagged solids and powders are loaded into a dry goods hopper and are fed to the mixer via enclosed auger. Liquids, including flavours are added to the mixer by hand or pumped from IBCs. Boilie line 2 is operated on a smaller scale, using manual mixer loading operations.

The mixed raw dough on either production line passes through its own dedicated extruder, cutter and roller to form the ball-shaped boilies. The boilies pass through an enclosed cooker containing an auger which propels the boilies through the cooking water for the desired time. A belt conveyor at the end of the auger drains off excess water before depositing the boilies on a slow moving drying belt. Any steam and odour from the cooking and initial drying process is exhausted to air, unabated, via a 13m chimney. Hoods over the initial drying area contain steam as far as practicable.

After initial drying, boilies are transferred to trays and transferred to the drying room. At this stage, and if required, additional flavour can be added to the boiling in a process known as dipping. The dipping area is an enclosed room equipped with dedicated extraction equipped with activated carbon filtration. The drying room is also connected to this abated extraction system.

Dried boilies are removed from the drying room in their trays and are transferred to the packing room. Flavour bottling is also undertaken in in the packing room and the packing room extraction is also equipped with carbon filtration.

Stores and associated waste storage areas form the remainder of the permitted installation.

Manufacturing equipment for production lines includes:

Boilie line 1:

- dry goods hopper
- auger fed mixers
- extruder / cutter / roller
- enclosed boiler
- cooling belt

Boilie line 2:

- hand fed mixers
- extruder / cutter / roller
- enclosed boiler
- cooling belt

Environmental Permit

MALDON DISTRICT COUNCIL

Permit Reference Number:
MLD/EPR/B/008

Maldon District Council ("the Regulator") in exercise of its powers under Regulation 13(1) of the Environmental Permitting (England and Wales) Regulations 2010 (SI 2010 No 675), hereby authorises ***Kevin Nash Group PLC*** ("the Operator").

Whose registered office is:

Kevin Nash Group PLC
1 Nelson Street
Southend-on-Sea
Essex
SS1 1EG

Whose company registration number is: ***02689107***

Whose principal place of business is:

18-22 Burnham Business Park
Springfield Road
Burnham-on-Crouch
Essex
CM0 8TE

The Operator is authorised to carry out the following activities* to the extent authorised by and subject to the conditions of this Permit.

1. Processing, storing or drying by the application of heat the whole or part of any dead animal or any vegetable matter (other than the treatment of effluent so as to permit its discharge into controlled waters or into a sewer unless the treatment involves the drying of any material with a view to its use as animal feedstuff) if the processing, storing or drying may result in the release into the air of any offensive smell noticeable outside the premises on which the activity is carried on, Section 6.8B(a) 'The Treatment of Animal and Vegetable Matter and Food Industries' of chapter 2 to Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2010 (as amended) and as described, and in accordance with the conditions contained in this permit.

To the extent authorised by and subject to the conditions of this Permit**.**

This Permit shall be subject to replacement, variation or amendment as may be considered appropriate by Maldon District Council, at any time, according to the provisions of Regulation 20 of the EPR.

* This Permit is given in relation to the requirements of the Environmental Permitting Regulations. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation. Nothing in this Permit grants or implies any consent under the Town and Country Planning Act.

Signed

Shirley Hall
Environmental Health Manager
The Authorised Officer for this purpose

Dated this day

18th August 2016

Conditions

The following Environmental Permit conditions are legal requirements.

Installation and activities

1 The permitted installation shall not extend beyond the area outlined in in red in Schedule 1 to this permit. The site boundary of the land occupied by the Operator is outlined in blue.

Emission release points

2 Emissions to air shall only be released from the emission release points as specified in this condition and as shown in Schedule 4 to this permit.

Reference	Source	Abatement	Details
Exhaust stack 1	Main production building	None	13m stack terminating 3.42m above roof ridge, fitted with a jet cap
	Tumbler room	Activated carbon	
Exhaust stack 2	Not in use		
Exhaust stack 3	Laboratory	Activated carbon	6.26 m stack terminating at eaves height, fitted with an accelerator cone
Exhaust stack 4	Packing & bottling room	Activated carbon	Vented internally into main production building
Exhaust stack 5	Not in use		
Exhaust stack 6	Not in use		
Exhaust stack 7	Not in use		
Exhaust stack 8	Not in use		
Exhaust stack 9	Dipping & drying room	Activated carbon	6.26 m stack terminating at eaves height, fitted with an accelerator cone
Exhaust stack 10	Boiler combustion emissions	None	stack terminating above lean-to roof

3 The Operator shall notify the Regulator in writing at least 14-days prior to any changes to extraction systems and exhaust stacks serving the permitted installation.

4 Where dispersion is used to achieve compliance with the odour emission limit specified in row 1 of the table in condition 7 the exit velocity shall be at least 15m/s. Where this cannot be achieved due to unacceptable emissions of droplets, the exit velocity shall be at least 9m/s.

5 Exhaust stacks shall not be fitted with any rain cap or other obstruction at the terminal point. A jet cap or accelerator cone may be used to increase the exit velocity to achieve greater dispersion of emissions.

6 Exhaust stacks and ductwork shall be cleaned to prevent accumulation of materials, as part of the routine maintenance programme.

Emission limits and monitoring

7 The emissions monitoring provisions of this condition shall apply to the whole of the permitted installation described in condition 1 and the emission release points described in condition 2:

Row	Substance	Source	Emission limits/ provisions	Type of monitoring	Monitoring frequency
1	Odour	All odour emissions from contained and fugitive sources	Free from offensive odour at or beyond the site boundary	Olfactory assessment at site boundary	At least daily
2	Particulate matter	Whole site	No visible emissions	Visual observations	At least daily
3	Droplets, persistent mist and fume	All emissions to air (except steam and condensed water vapour)	No droplets, no persistent mist, no persistent fume	Visual observations	At least daily

8 A simple wind direction indicator (such as a windsock or weather vane) shall be installed in order that likely emission paths and areas of potential odour impact can be identified in the case of abnormal emissions.

9 The assessment of emissions in accordance with row 1 of the emissions monitoring provision in condition 7 shall be undertaken in accordance with a documented odour monitoring plan, which shall include documented procedure for emissions monitoring.

10 The operator shall keep documented records of emissions monitoring undertaken in accordance with condition 7. Emissions monitoring records shall:

(a) detail the name of the person undertaking the assessment, and;
(b) include wind direction and strength; and,
(c) detail the outcome of the assessment; and,
(d) be legible; and,
(e) be kept on site; and,
(f) be kept by the operator for at least two years; and,
(g) be made available for the regulator to examine.

11 In the event of abnormal emissions, malfunction or breakdown leading to abnormal emissions the Operator shall:

(a) investigate and undertake remedial action **immediately**; and,
(b) stop or adjust the process or activity to minimise those emissions; **and**
(c) promptly record the events and actions taken.

12 The Regulator shall be informed **without delay**, whether or not there is related monitoring showing an adverse result:

(a) if there is an emission that is likely to have an effect on the local community; **or,**
(b) in the event of the failure of key arrestment plant, for example, extraction equipment or filter units.

13 In this permit, the term **'immediately'**, means at the time of the abnormal emission or plant failure.

14 In this permit, the term **'without delay'**, means the same day of the abnormal emission or plant failure.

Emissions control techniques

Main process areas

15 The main production area shall be provided with sufficient extract ventilation to maintain an adequate negative pressure.

16 All dusty, or potentially dusty materials, including dusty waste shall be stored in covered containers, sealed bags or purpose built silos.

17 Emissions of particulate matter from grinders, choppers, mills, mixers and dryers shall be contained, extracted and filtered if necessary to meet the particulate emission provisions specified in row 2 of the table in condition 7.

18 The bulk transfer of dry raw materials to boilie line 1 shall be by suitable mechanical handling systems such as screw auger, gravity or pneumatic means. Manual transfer of raw materials to boilie line 2 is permitted.

19 Boilie cookers, shall be enclosed as far as practicable, and where necessary shall be provided with a containment and collection system for steam, condensate and odorous emissions.

Dipping, tumbling and drying

20 Dipping, tumbling and drying shall only be undertaken in the designated dipping, tumbling and drying areas as shown in Schedules 2 & 3 to this permit.

21 Designated dipping, tumbling and drying areas shall be equipped with dedicated extract ventilation, sufficient to maintain those areas under negative pressure during dipping, tumbling and drying operations.

22 Extract ventilation serving designated dipping and drying areas shall be permanently connected to an exhaust stack as described in condition 2, and operated with activated carbon filtration.

23 Extract ventilation serving designated tumbling areas shall be permanently connected to an exhaust stack as described in condition 2, and operated with activated carbon filtration.

24 Dipping and drying shall only be undertaken in the designated dipping and drying areas with the extraction system fully functioning.

25 Access doors to the dipping and drying areas shall be kept closed other than when in active use.

Other & general

26 Extract ventilation serving the packing and bottling room shall be permanently connected to an exhaust stack as described in condition 2, and operated with activated carbon filtration.

27 Extract ventilation serving the laboratory shall be permanently connected to an exhaust stack as described in condition 2, and operated with activated carbon filtration.

28 The production building structure, floors, equipment and containers shall be capable of being cleaned effectively, and maintained in good condition. Cardboard or similar sacrificial floor coverings shall not be used.

29 All effluent arising within buildings including floor washings shall be drained to foul sewer.

30 Potentially odorous waste materials shall be stored inside the process building unless in sealed containers. In this condition, covered skips shall not be regarded as sealed containers.

31 Suitable and sufficient equipment to deal with spillages shall be held on site.

32 A high standard of housekeeping to me maintained.

33 The use of odour masking agents and counteractants is not permitted.

Management controls & maintenance

Management controls

34 The Operator shall prepare and maintain a documented odour response procedure for use by operational staff on a day-to-day basis. The odour response procedure shall include (but not be limited to):

(a) a list of essential spares for the odour control equipment; and,
(b) actions to be taken in the event of extraction system breakdown, including suspending process operations.

35 Personnel at all levels shall be given training and instruction sufficient to fulfil their designated duties under the above structure. Details of such training and instruction shall be entered into an appropriate record and be made available for inspection by the Regulator.

36 A primary point of contact shall be appointed to liaise with the regulator and the public with regard to complaints. The Regulator should be informed of the designated individual(s) within 4 weeks of the date of issue of this permit. Any changes off the contacts shall be notified to the Regulator without delay.

37 A formal structure shall be provided to clarify the extent of each level of employee's responsibility with regard to the control of the process and its environmental impacts. This structure shall be prominently displayed on the company within the process building at all times. Alternatively, there must be a prominent notice referring all relevant employees to where the information can be found.

38 Written or computer records of all tests and monitoring shall be kept by the operator for at least 2 years. They, and a copy of any manufacturers' instructions referred to in this permit, shall be made available for examination by the Council. Records shall be kept of operator inspections, including those for visible emissions.

Maintenance

39 The Operator shall prepare and maintain a documented planned preventative maintenance programme. The planned preventative maintenance programme shall include (but not be limited to):

(a) abatement plant maintenance (carbon filter replacement); and,
(b) LEV testing; and,
(c) exhaust stack and ductwork cleaning.

Best available techniques

40 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.

Process changes & operations review

41 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.

42 Within 28-days of receipt of written notification from the Regulator, the Operator shall take all necessary steps to investigate and implement techniques to reduce or eliminate odour emissions. An example of such steps that could be taken includes, but is not limited to:

(a) identification of the nature of the odour; and,
(b) identification of the source of the odour; and,
(c) proposed actions to prevent or reduce odour; and,
(d) odour abatement; and,
(e) timetable for proposed actions; and,
(f) revisions to odour response procedures.

Interpretations and Explanatory Notes

These interpretations and explanatory notes does not form part of your Environmental Permit conditions, however they do provide useful information about the Environmental Permitting Regulations:

In relation to this Permit, the following expressions shall have the following meanings:

"Activity"	An activity listed in Part 2 of Schedule 1 to the EP Regulations which will form part of an EP installation or be a mobile plant
"The EPR / EP Regulation*"*	Means the Environmental Permitting (England and Wales) Regulations 2010 S.I. 2010 No.675 (as amended) and words and expressions defined in the EPR shall have the same meanings when used in this Permit save to the extent they are explicitly defined in this Permit.
"Change in Operation"	In relation to an installation or mobile plant, a change in its nature or functioning or an extension which may have consequences for the environment.
"Enforcement notice"	A notice served by a local authority to enforce compliance with the permit conditions or require remediation of any harm following a breach of any condition.
"Installation"	A stationary technical unit where one or more activities listed in Part 2 of Schedule 1 to the EP Regulations are carried out and any other location on the same site where any other directly-associated activities are carried out, and any activities that are technically linked. The terms 'regulated facility' and 'installation' are, in effect, interchangeable for A(2) and B activities.
"Operator"	The person who has control over the operation of the installation/regulated facility (EP Regulation 7).
"Permit"	A permit granted under EP Regulation 13 by a local authority allowing the operation of an installation subject to certain conditions.
"Pollution"	Any emission as a result of human activity which may be harmful to human health or the quality of the environment, cause offence to any human senses, result in damage to material property, or impair or interfere with amenities and other legitimate uses of the environment (EP Regulation 2(1)).
"Revocation notice"	A notice served by the Regulator under EP regulation 22 revoking all or part of a permit.
"Permitted Installation"	Means the activities and the limits to those activities described in this Permit.
"Monitoring"	Includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys.
"MCERTS"	Means the Environment Agency's Monitoring Certification Scheme.
"Fugitive Emission"	Means an emission to air or water (including sewer) from the Permitted installation that is not controlled by an emission limit imposed by a condition of this Permit.
"Regulator"	Means any officer of Maldon District Council who is authorised under Section 108(1) of the Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in Section 108(1) of that Act.
"Best Available Techniques (BAT)"	Best available techniques means 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 practical, generally to reduce emissions and the impact on the environment as a whole. For those purposes: "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; "Best" means, in relation to techniques, the most effective in achieving a high general level of protection of the environment as a whole; "Techniques" includes both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned. Schedule 2 of the Regulations shall have effect in relation to the determination of best available techniques.

Where any condition of this Permit refers to the whole or parts of different documents, in the event of any conflict between the wording of such documents, the document with the most recent publication date shall be taken to be the most appropriate document to be used.

Any person who is aggrieved by the conditions attached to a Permit can appeal to the Secretary of State for Environment, Food & Rural Affairs. Appeals must be received by the Secretary of State no later than 6 months from the date of the decision (the date of the Permit).

Appeals relating to installations in England should be received by the Secretary of State for Environment, Food & Rural Affairs. The address is as follows;

The Planning Inspectorate
Environment Team, Major and Specialist Casework
Room 4/04 – Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 PN

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included;

(a) A statement of the ground of appeal;
(b) A copy of any relevant application;
(c) A copy of any relevant Permit;
(d) A copy of any relevant correspondence between the person making the appeal ("the appellant") and the Council;
(e) A statement indicating whether the appellant wishes the appeal to be dealt with.

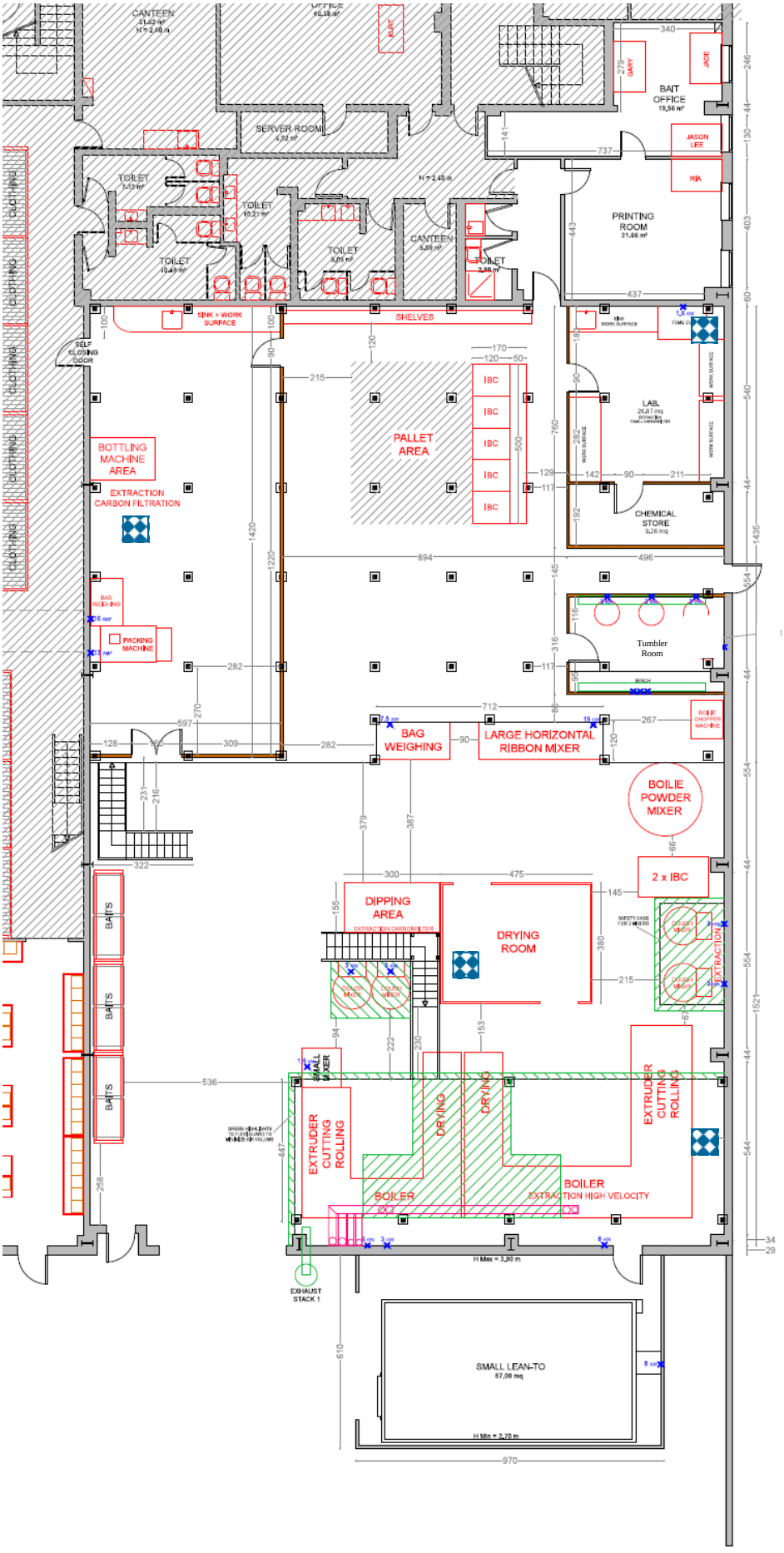
- By a hearing attended by both parties and conducted by an inspector appointed by the Secretary of State; or
- By both parties sending the Secretary of State written statements of their case (and having the opportunity to comment upon one another's statements).

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 appropriate Secretary of State that this has been done.

- 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 to either vary any of these conditions or to add new conditions.

MALDON DISTRICT COUNCIL

Installation:	**Kevin Nash Group PLC**		
Project:	**Permit Application**		
Drawing:	**Location Plan**	Reference:	**Schedule 1**
Date:	**14th July 2016**	Scale:	**Not to scale**



Installation:	**Kevin Nash Group PLC**		
Project:	**Permit Application**		
Drawing:	**Site Plan: Ground Floor**	Reference:	**Schedule 2**
Date:	**3rd August 2016**	Scale:	**Not to scale**

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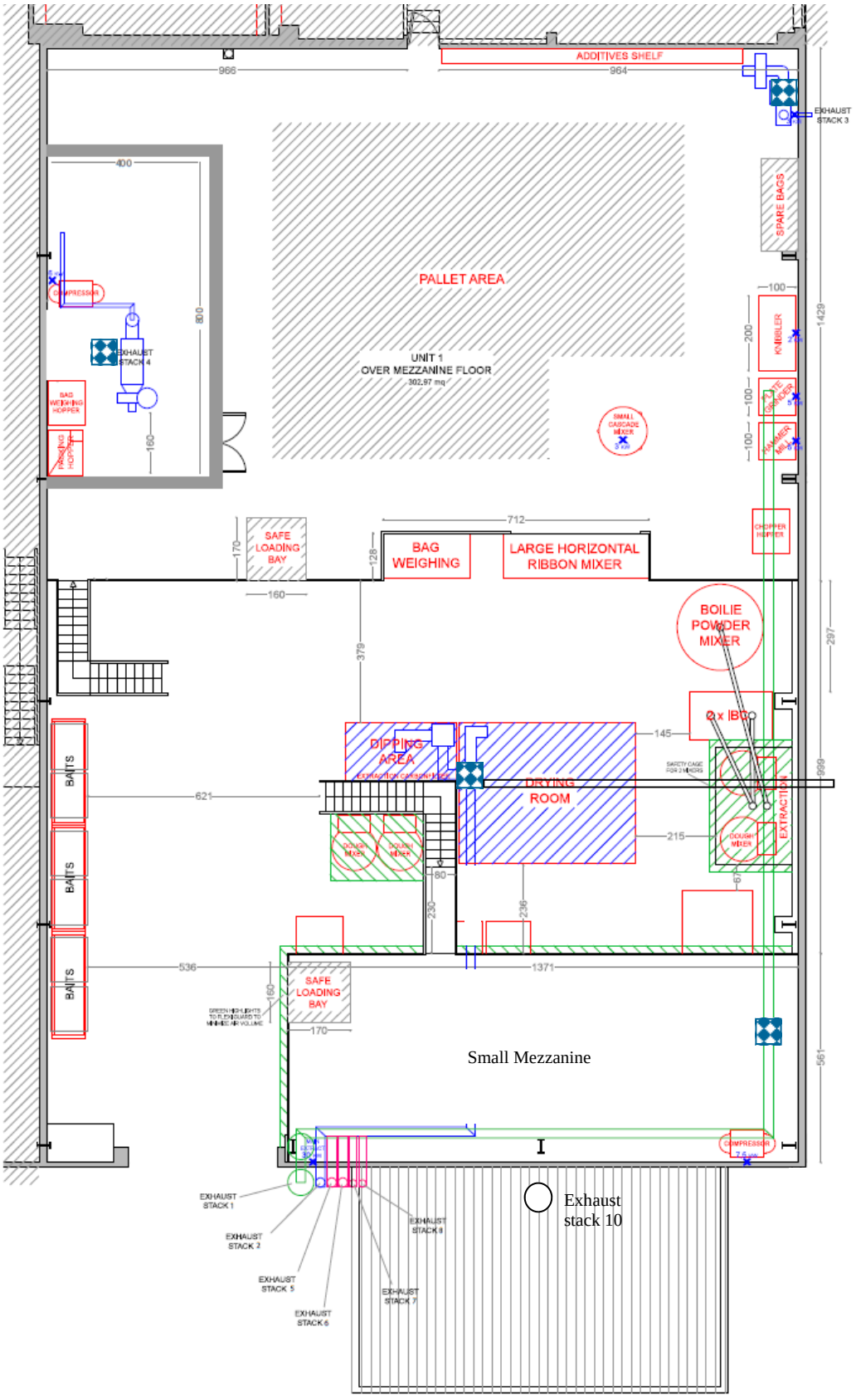

Installation:	**Kevin Nash Group PLC**		
Project:	**Permit Application**		
Drawing:	**Site Plan: First Floor**	Reference:	**Schedule 3**
Date:	**3rd August 2016**	Scale:	**Not to scale**

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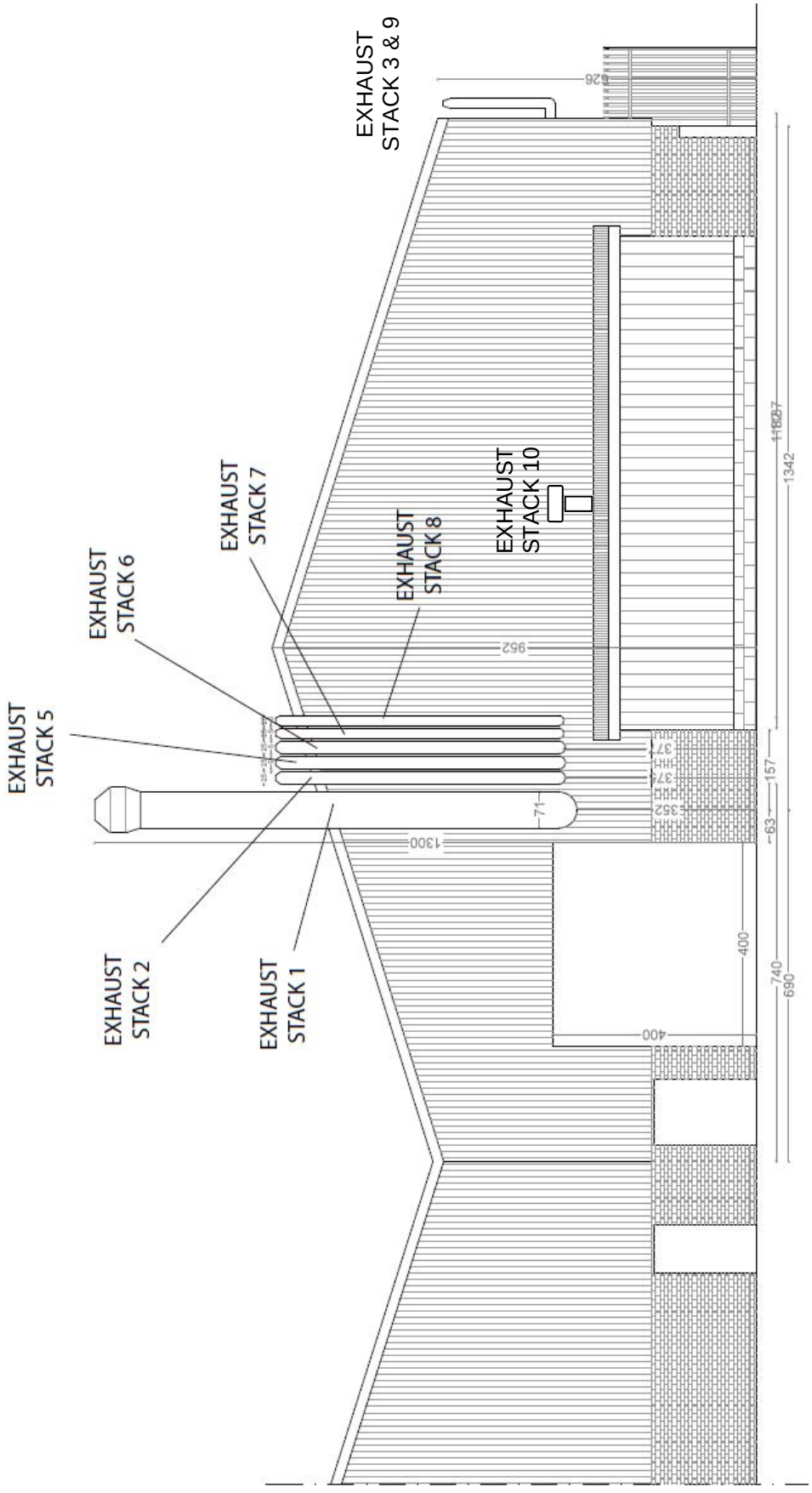

Installation:	**Kevin Nash Group PLC**		
Project:	**Permit Application**		
Drawing:	**Emission Release Points**	Reference:	**Schedule 4**
Date:	**3rd August 2016**	Scale:	**Not to scale**

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