

**UNITRITION
INTERNATIONAL
LIMITED**

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*SPECIALIST OIL SEED CRUSHERS
AND RAW MATERIAL UPGRADERS*



Mr J Allan
Environmental Health Officer
Huntingdon District Council
Pathfinders House
St Mary Street
HUNTINGDON
Cambridgeshire
PE18 6TN

28 September 1995

Dear Mr Allan

ENVIRONMENTAL PROTECTION ACT - AUTHORISATION HOC93/13

Further to our meeting on Friday 8 September 1995, with our Mr M Lapper, I would confirm our discussions.

Unitriton upgrades straw into a manufactured raw material for different industries, one of which is the animal feed industry where we are competing with grain residue and products from the food industry etc.

We were told that we were included in the EPA, although we were not animal feed manufacturers or vegetable matter driers. We have maintained that we were a "grey area", but applied under the animal food guidance notes.

The process is different from a conventional feed mill as the main exhaust is prior to pelleting. The varying moisture level of the raw materials and high intermittent temperatures gives design difficulties from traditional methods commonly used to comply to the Regulation and to be safe for both the plant and employees.

We now believe we have identified a system with limited guarantees from suppliers. This system has been costed for Kimbolton at an excessively high cost which we believe is not BATNEEC and that the industry can ill afford in the current climate.

We are greatly concerned at the cost, which we believe is excessive.

Our trade organisation, UKASTA, are discussing the position of straw processing within the EPA at a meeting with the DoE in October 1995.

Cont'd...



It may be possible to prove the proposed system at our Gainsborough plant, using some equipment from a larger feed mill.

I look forward to meeting you in the future.

Yours sincerely

A handwritten signature in black ink, appearing to be 'B. W. Porter', with a large loop and a horizontal stroke extending to the right.

B W Porter
Technical Manager

BWP/KJT

ENVIRONMENTAL PROTECTION ACT 1990, PART I

**GUIDANCE FROM THE DEPARTMENT OF THE ENVIRONMENT AND THE WELSH
OFFICE: PG6/26(92) - ANIMAL FEED COMPOUNDING PROCESSES**

As mentioned in AQ15(95), in March 1995 local authorities were all sent a copy of the Departments' paper "The Monitoring and Dispersion of Emissions from Part B Processes". The covering letter advised that the paper did not take precedence over the statutory guidance in the published PG notes pending their review, but should be borne in mind.

This additional guidance note is to advise specifically in relation to PG6/26(92) - animal feed compounding processes - that the guidance on continuous monitoring in the published PG note may be revised in the light of the review.

The review is unlikely to be completed until shortly after the upgrading deadline in PG6/26 - 1 April 1996. In the circumstances, the Departments consider that, other than in exceptional circumstances, local authorities should accept deferral of the installation of monitoring equipment until after the revised PG note has been published, allowing a further reasonable period for the equipment to be selected, purchased and installed.