POLLUTION PREVENTION AND CONTROL ACT 1999
Environmental Permitting (England and Wales) Regulations 2007, Regulations 20 and 18

EP Permit ref: B03/94 Variation ref: PPC 11/08

Variation Notice

From: Huntingdonshire District Council Council ("the Council")

To: (1)

Sundown Straw Products Ltd
Station Road
Tilbrook
Huntingdon
PE28 3PA

The Council, in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2007 (2) ('the 2007 Regulations') hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference B03/94 granted under [regulation 17(1) of the Pollution Prevention and Control (England and Wales) Regulations 2000] [regulation 13(1) of the 2007 Regulations] in respect of the operation of the installation/~~mobile plant~~ at:

StationRoad
Tilbrook
Huntingdon
PE186YN

The variation of the conditions of the permit and the date(s) on which they are to take effect are specified in [Schedule 1] to this notice. [A consolidated permit as varied by this notice [and by variation notices ref 08/01 is set out in Schedule 2].]

~~[You are hereby required to pay by no later than the sum of £ - the fee prescribed in respect of a variation notice in the relevant charging scheme made under regulation 65 of the 2007 Regulations [and] [or] section 41 of the Environment Act 1995 for LA-IPPC only where there are separate charges in relation to water discharges (3).]~~

Signed on behalf of Huntingdonshire District Council Council

Dated 28th October 2008 Signed

Designation Head of Environmental & Community Health Services

An authorised officer of the Council

(1) The operator at the address shown on permit / application.
(2) SI 2007/3538
(3) 1995 c.25.

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EP Permit ref: B03/94

Variation ref: PPC 11/08

Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
All permit conditions	28th October 2008

Signed on behalf of Huntingdonshire District Council

Dated 28th October 2008

Signed

Designation Head of Environmental and Community Health Services

An authorised officer of the Council

Schedule 2

Permit reference B03/94 as varied by this notice and variation notices 08/01

(Insert amended or full consolidated permit).

Permit reference B03/94 as varied by this Notice and Variation Notices 08/01.

Huntingdonshire
DISTRICT COUNCIL

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2007

Permit Reference No: B03/94

Huntingdonshire District council (the regulator) hereby permits Sundown Straw Products Ltd, Station Road, Tilbrook, Huntingdon, Cambridgeshire, PE18 6YN to operate a vegetable matter drying process as defined in Part 2 of Schedule 1 to the EP Regulations Section 6.8, and as described below in accordance with the following conditions which shall apply forthwith.

Address of permitted activity: **Sundown Straw Products Ltd**
Station Road
Tilbrook
Huntingdon
Cambridgeshire PE18 6YN

Description of Activity

The process is prescribed for Local Authority Air Pollution Control under Section 6.8 of Schedule 1 to the Environmental Permitting (England and Wales) Regulations 2007. It consists of the upgrading of straw primarily for use as animal feed, by chopping, grinding and pelletising at high pressure. Drawing reference B03/94(a) is a simplified schematic of the plant showing the main process equipment, abatement plant and five points of discharge to atmosphere.

Straw is also chopped and dedusted – the dust is fed back into the pelleting process.

Cereal straw is delivered to the plant by lorry where it is weighed and tested for moisture content up to a maximum of 16% before being accepted. The straw is then mechanically unloaded and stacked in the mill yard under cover in a storage bay, before bring introduced to the process.

Tub Grinding

Straw is fed via bale transporters into two intakes: tub 1 is for the bedding plant and the pelleting plant and tub 2 is used to feed the pelleting plant as the pelleting machines are designed for continual operation. The tub grinders reduce the straw particle size and are enclosed to contain dust. The straw is pneumatically and mechanically conveyed to both plants. Dust separation for grinder 1 is provided by a primary and secondary cyclone, which

emits filtered air at discharge point 1 as shown on drawing B03/94(a). Some fugitive dust emissions occur from the bail transporters.

The Bedding plant

Straw is chopped to the required size and conveyed to the baling plant where it is passes through two de-dusters before a preservative is added depending upon the product being processed. Further materials can be added at this point. The treated or blended straw is stored in a large variable speed conveyor to control the throughput to the baling plant. The product is weighed before being compressed into a pre-determined bale size and heat-sealed in plastic wrapping. The bales are conveyed to an automatic palletiser and, using a robotic bale placer, the bales are stacked up to eight rows high. The packaging is finished by stretch wrapping the completed pallet and contents. The palleted product is taken from the machine mechanically and stored in the warehouse waiting for dispatch.

Fines from the de-dusters are conveyed to the pelleting for processing whilst remaining dust in the product steam is filtered by a Provenair dust filter, with the filtered air being discharged to atmosphere at position 5 on drawing B03/94(a). There is also a dust extractor and bag filter system serving the baler. The separated fines are mechanically conveyed to the pelleting plant for further processing together with fines from the de-dusters. Filtered air is discharged to atmosphere at position 4 on drawing B03/94(a).

The whole of the bedding plant is enclosed inside a building.

The Pelleting Plant

Straw and fines are fed into the storage conveyor, which controls the throughput of the plant, by variable speed motors. Straw is then fed into the process area and pneumatically conveyed through a hammer mill to reduce the particle size further. The process material is then separated via a cyclone and a sock filter in series, both fitted with rotary seal and detection equipment, which stops all feed and sets off an alarm in the event of a blockage. Discharge to atmosphere is from the sock filter, shown at position 2 on drawing B03/94(a).

The chopped straw is then fed into a continuous process mixer where small quantities of sodium hydroxide and water are added. After the mixer material is conveyed to two extrusion presses which pellet the straw into 6mm nuts and through heat and pressure starts the upgrading process. The pellets are passed over a weigher, which controls the proportioning system. Pellets are passed through a crumbler for bedding products or by-passed for pellet manufacture.

The product is then fed into a cooler with no air movement at one end to ensure the chemical reaction is complete and then cooled to ambient temperature by air being circulated through the product removing any fines. Dust/fines are separated via another cyclone, with fines being returned to the extrusion presses and filtered air being discharged to atmosphere at position 3, as shown on drawing B03/94(a).

After cooling the product is conveyed to four 125 tonne storage silos. Bedding material is taken out by an outloading system and transferred to the bedding plant or pellets can loaded into bulk vehicles.

Both sodium hydroxide and diesel are stored in bulk tanks in a bunded wall and fitted with visual and audible alarms.

Conditions

	Pollutant	Source	Emission limit/ Provision	Type of Monitoring	Frequency
1	Odour	Contained and fugitive sources	Free from offensive odour at boundary	Olfactory	Daily
2	Particulate matter	Dryer and coolers	150mg/m^3	Indicative	Continuous
				Extractive	Annual [1] [2]
3	Particulate matter	Process sources not including dryers and coolers	20mg/m^3	Indicative	Continuous
				Extractive	Annual [1] [2]
[1] The reference conditions are 273K, 101.3kPa without correction for water vapour content [2] The introduction of dilution to air to achieve emission limits shall not be permitted.					

4. The operator shall keep records of inspection, tests and monitoring, including all non-continuous monitoring, inspections and visual assessment. The records shall be
   - Kept on site,
   - Kept by the operator for at least two year; and
   - Made available for the regulator to examine.

5. A summary of the data identifying the times, dates and duration of alarm events from indicative continuous monitoring relating to particulate matter monitoring shall be submitted to the regulator at least every six months.

6. The operator shall notify the regulator at least 7 days before any periodic monitoring exercise to determine compliance with emission limit vales.

7. The results of non-continuous emission testing shall be forwarded to the regulator within 8 weeks of the completion of the sampling.

8. Adverse results from any monitoring activity, both continuous and non-continuous) shall be investigated by the operator as soon as the monitoring data has been obtained/ received. The operator shall
   - Identify the cause and take corrective action
   - Record as much detail as possible regarding the cause and extent of the problem, and the action taken by the operator to rectify the situation.
   - Re-test to demonstrate compliance as soon as possible; and
   - Notify the regulator.

9. In the case of abnormal emissions, malfunction or breakdown leading to abnormal emissions the operator shall:
   - Investigate and undertake remedial action immediately
   - Adjust the process or activity to minimise those emissions; and
   - Promptly record the events and actions taken.

10. All releases to air, other than condensed water vapour, shall be free from persistent visible emissions.

11. All emissions to air shall be free from droplets.

12. The operator shall develop a list of key plant and have a written procedure for dealing with its failure, in order to minimise any adverse effects.

13. The regulator shall be informed without delay if there is an emission that is likely to have an effect on the local community.

14. A simple wind direction indicator shall be installed in order that likely emission paths and areas of potential odour impact can be identified in the case of abnormal emissions.

15. All continuous monitoring instruments shall be fitted with audible and visual alarms, situated appropriately to warn the operator of arrestment plant failure or malfunction.

16. All continuous monitoring readings shall be on display to appropriately trained staff. The activation of continuous monitored alarms shall be automatically recorded.

17. All continuous monitors shall be operated, maintained and calibrated in accordance with the manufacturers' instructions, which shall be made available for inspection by the regulator. The relevant maintenance and calibration shall be recorded.

18. Purchasers of new or replacement monitoring equipment shall specify the requirement for less than 5% downtime over any 3 month period.

19. In the event of a change of fuel to the dryer the regulator will be notified before commissioning.

20. Cyclones which are used for control of emissions of particulate matter shall be continuously indicatively monitored by either:
    - Continuous indicative monitoring of emissions of particulate matter from the final discharge to air, or
    - A level sensor to detect blockage of the cyclone which is interlocked to the process to immediately shut down the cooler discharge and pellet mill feed in case of activation of the alarm.

21. All new or replacement silo filtration plant shall be designed to operate to an emission standard of less than 10 mg/m^3 for particulate matter

22. All dusty or potentially dusty materials shall be stored in silos, in confined storage areas, or in fully enclosed containers/ packaging. Where the storage is outside, then suitable precautions shall be taken to prevent wind whipping. The storage of dried products shall be permitted inside processing building provided that adequate steps are taken to prevent entrainment of particulate matter outside the building.

23. Bulk storage tanks and silos containing dry materials shall be equipped with audible and/ or visual high level alarms, or volume indicators, to warn of over filling. The correct operation of such alarms shall be checked in accordance with manufacturers' instructions. If manufacturers' instructions do not specify, then the check shall be weekly or before a delivery takes place, whichever is the longer interval.

24. Care shall be taken to avoid delivering materials to silos at a rate which is likely to result in pressurisation of the silo. If compressed air is being used to blow powder into a silo then particular care is required towards the end of the delivery when the quantity of material entering the ducting is reduced and hence the air flow is increased.

25. All new silos shall be fitted with an automatic system to cut off delivery in the event of pressurisation or overfilling. Use of alternative techniques may be acceptable provided that they achieve an equivalent level of control with regard to potential for emissions to air.

26. All spillages shall be cleared as soon as possible. Dry sweeping of dusty spillages shall not be permitted in circumstances where it may lead to the deposition of dust outside the site boundary.

27. All internal transport of dusty materials shall be carried out to prevent, or where prevention is not practicable, minimise air borne dust emissions.

28. Where conveyors are used they shall be of sufficient capacity to handle maximum loads. External conveyor discharges shall be arranged to minimise free fall and adequately enclosed to prevent wind whipping.

29. Where necessary, in order to minimise emissions of dust extraction shall be provided from transfer points to arrestment plant for example a bag filter.

30. A regular programme of cleaning shall be instigated. This shall also address external horizontal surfaces and ledges. This shall include gutters, roofs, flues, ductwork, floors, roadways and other areas where there is regular movement of vehicles.

31. Exhaust gases discharged through a stack of vent shall achieve an exit velocity greater than 15m/sec during normal operating conditions to achieve adequate dispersion.

32. Stacks or vents shall not be fitted with any restriction at the final opening such as a plate, cap or cowl with the exception of a cone which may be necessary to increase the exit velocity of the emissions.

33. Training of all staff with responsibilities for operating the process shall include:
    - Awareness of their responsibilities under the permit.
    - Minimising emissions on start up and shut down.
    - Action to minimise emissions during abnormal conditions.

34. The operator shall maintain a statement of training requirements for each operational post and keep a record of the training received by each person whose actions may have an impact on the environment. These documents shall be made available to the regulator on request.

35. A written maintenance programme shall be provided to the regulator with respect to pollution control equipment.

36. A record of such maintenance shall be made available for inspection.

37. Spares and consumables, in particular those subject to continual wear, shall be held on site, or shall be available at short notice from guaranteed local suppliers, so that plant breakdowns can be rectified rapidly.

38. The operator shall prepare an Odour Response Procedure as outlined in Process Guidance Note 6/27(05) Secretary of State's Guidance for Vegetable Matter Drying Processes or amended versions.

Signed: ..... Date: 28 October 2008

Head of Environmental and Community Health Services

GENERAL NOTES

1 Best available techniques

The best available technique shall be used to prevent or, where that is not practicable, reduce emissions from the installation or mobile plant in relation to any aspect of the operation of the installation or mobile plant which is not regulated by any other condition of this permit.

2 Variation

The regulator will ensure that the permit remains up to date in line with the requirements set out in Regulation 20(1) This may involve issuing a Variation Notice following amendment to the Secretary of State's Guidance Notes or following receipt of any direction from the Secretary of State.

3 Review of Conditions

The regulator may at any time undertake a review of the conditions in this permit under Regulation 34(1). Where significant pollution is encountered or where there are changes in BAT or where the operational safety of the activity requires other techniques to be used an immediate review shall be undertaken.

4 Appeal

The permitted operator can appeal in writing to the Secretary of State against the items listed in Regulation 31.

5 Transfer of Permit

The permitted operator who wishes to transfer the whole or part of the permit to a person who proposes to carry out the activity in the holder's place may do so in accordance with Regulation 21. Both the operator and the proposed transferee shall jointly make an application to the regulator to effect the transfer. An application shall include the permit and any fee prescribed in respect of the transfer under Regulation 19 and shall contain the operator's and the proposed transferee's contact details.

6 Notification of Proposed Change of Operation

If the operator proposes to make a change in operation of the installation, they 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. Change of operation means a change in the nature of functioning, or an extension, of the installation, which may have consequences for the environment.

7 Variation of Conditions of Permits

Under Regulation 20, the operator may apply to the regulator to vary the conditions contained within the permit. Such application shall be made in accordance with Part 1 of Schedule 5 and shall be accompanied by any fee prescribed in respect of the application under Regulation 19; and paragraphs 8 of Part 1 of Schedule 5 and paragraphs 5(3) and (4) of schedule 5 shall have effect with respect to such applications.

8 Other Legal Requirements

This permit is issued solely for the purpose of the Pollution Prevention and Control Act and its associated Regulations and the operator must ensure that he complies with all other statutory requirements.

9 Annual Subsistence Charge

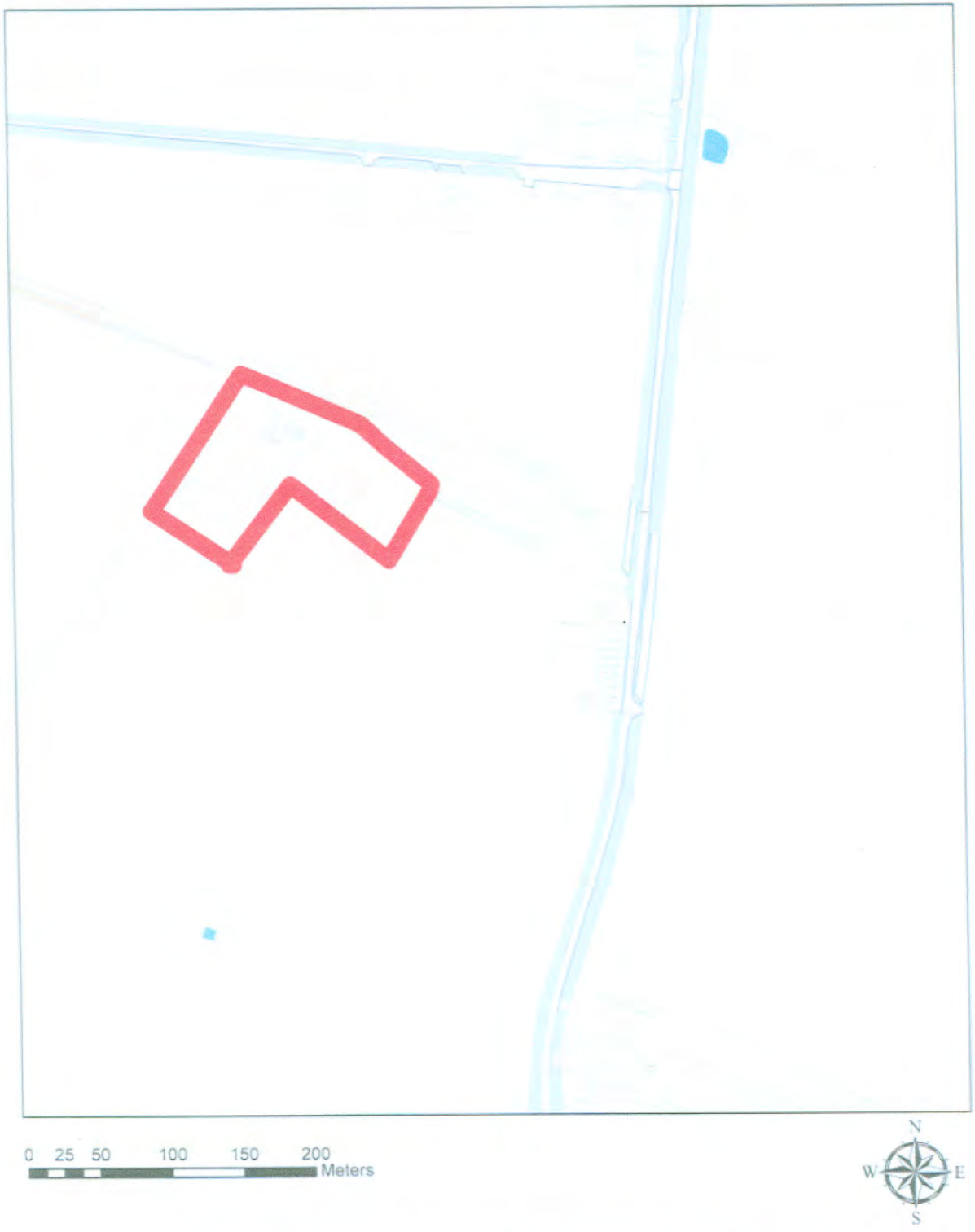
The Secretary of State has drawn up a charging scheme under Regulation 19. Under this scheme Local Authorities are required to levy an annual subsistence charge related to the permit. The Local Authority will invoice for the amount due which is subject to annual review by the Department of the Environment Food and Rural Affairs.

Summary of control techniques

Release source	Substance	Control technique
Raw material, effluent and waste storage	Odour	Within enclosed silos, tanks, containers or stores under negative pressure and vented to odour arrestment plant. Spillage management including tank level management. Good house keeping and raw material practices
Loading and unloading processes	Odour	Enclosed vehicles and containers Backventing of storage tanks as necessary. Spillage management
Drying and cooling processes	Odour	Within process equipment under negative pressure and vented to odour arrestment plant as necessary. Gas recirculation. Condensing moisture depending upon effluent disposal issues. Appropriate construction
Physical process operations and applications of heat (grinding, extrusion, cooking etc.)	Odour	Within process equipment under negative pressure and vented to odour arrestment plant as necessary. Optimisation of the process. Appropriate construction • Impervious and easy to clean surfaces.
Ventilated air	Odour	Containment of odours within process buildings by good design and extract ventilation. Vent to suitable arrestment plant • Preliminary condensers

		• Biofilters • Thermal oxidisers/ combustion plant • Scrubbers • Located to take account of sensitive receptors
Waste gas from dryer and odour arrestment plant	Odour	Dispersion of any residual odourous releases
Waste gas from dryer and odour arrestment plant	Sulphur dioxide	Limit sulphur in fuel
Waste gas from dryer odour arrestment plant	Carbon monoxide	Good combustion
Waste gas from dryer odour arrestment plant	Nitrogen oxides	Good combustion
Raw material and product storage	Particulate matter	Potentially dusty materials should be stored in buildings or appropriate containers
Silos	Particulate matter	Process control on delivery to silos Dust arrestment • Bag filters • Cartridge filters
Dryer and cooling processes	Particulate matter	Process Control In-line solid material recovery from waste gases • Cyclones • Scrubbers
Pelletising, grinding and cooling processes	Particulate matter	Process control Spillage management Dust arrestment • Bag filters • Cartridge filters • Cyclone/wet arrestors

B03/94(a) Location plan



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Guidance for operators receiving a Variation Notice

(This guidance does not form part of the Variation Notice, but it is for the guidance of those served with the notice.) Further guidance can be found in the PPC General Guidance Manual at www.defra.gov.uk/environment/ppc.

Dealing with a Variation Notice

This notice varies the terms of the permit specified in the Notice by amending or deleting certain existing conditions and/or adding new conditions. The Schedules attached to the notice explain which conditions have been amended, added or deleted and the dates on which these have effect.

The Council may have included a 'consolidated permit', which takes into account these and previous variations. Where a consolidated permit is not included this variation notice must be read in conjunction with your permit document.

Offences

Failure to comply with a Variation Notice is an offence under regulation 38(1) (b) of the 2007 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £20,000 or imprisonment for a term not exceeding 6 months or both; or (ii) to an unlimited fine or imprisonment for a term not exceeding 5 years or both, depending on whether the matter is dealt with in the Magistrates or Crown Court.

Appeals

Under regulation 31 and Schedule 6 of the 2007 Regulations operators have the right of appeal against the conditions attached to their permit by a variation notice. The right to appeal does not apply in circumstances where the notice implements a direction of the Secretary of State/Welsh Ministers given under regulations 61 or 62 or a direction or when determining an appeal.

Appeals against a Variation Notice do not have the effect of suspending the operation of the Notice. Appeals do not have the effect of suspending permit conditions, or any of the mentioned notices.

Notice of appeal against a Variation Notice must be given within two months of the date of the variation notification, which is the subject matter or the appeal. The Secretary of State/Welsh Ministers may in a particular case allow notice of appeal to be given after the expiry of this period, but would only do so in the most compelling circumstances.

How to appeal

There are no forms or charges for appealing. However, for an appeal to be valid, appellants (the person/operator making the appeal) are legally required to provide (see paragraphs 2(1) and (2) of Schedule 6 of the 2007 Regulations):

- the appropriate authority written notice of the appeal
- a statement of the grounds of appeal;
- a copy of any relevant application;
- a copy of any relevant environmental 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; and
- a statement indicating whether the appellant wishes the appeal to be in the form of a hearing or dealt with by way of written representations.

Appellants should state whether any of the information enclosed with the appeal has been the subject of a successful application for confidentiality under regulation 48 of the 2007 Regulations, and provide relevant details – see below. Unless such information is provided all documents submitted will be open to inspection.

Where to send your appeal documents

Appeals should be despatched on the day they are dated, and addressed 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

Or for appeals in Wales:

The Planning Inspectorate
Crown Buildings
Cathays Park
CARDIFF
CF10 3NQ

If an appeal is made, the main parties will be kept informed about the next steps, and will also normally be provided with additional copies of each other's representations.

To withdraw an appeal – which may be done at any time - the appellant must notify the Planning Inspectorate in writing and copy the notification to the local authority who must in turn notify anyone with an interest in the appeal.

Costs

The operator and local authority will normally be expected to pay their own expenses during an appeal. Where a hearing or inquiry is held as part of the appeal process, by virtue of paragraph 5(6) of Schedule 6, either the appellant or the authority can apply for costs. Applications for costs are normally heard towards the end of the proceedings and will only be allowed if the party claiming them can show that the other side behaved unreasonably and put them to unnecessary expense. There is no provision for costs to be awarded where appeals are dealt with by written representatives.

Confidentiality

An operator may request certain information to remain confidential, ie not be placed on the public register. The operator must request the exclusion from the public register of confidential information at the time of supply of the information requested by this notice or any other notice. The operator should provide clear justification for each item wishing to be kept from the register. The onus is on the operator to provide a clear justification for each item to be kept from the register. It will not simply be sufficient to say that the process is a trade secret.

The test of whether information is confidential for the purposes of being withheld from the public register is complex and is explained, together with the procedures, in chapter 8 of the PPC General Guidance Manual.

National security

Information may be excluded from the public register on the grounds of National Security. If it is considered that the inclusion of information on a public register is contrary to the interests of national security, the operator may apply to the Secretary of State/Welsh Ministers, specifying the information and indicating the apparent nature of risk to national security. The operator must inform the local authority of such an application, who will not include the information on the public register until the Secretary of State/Welsh Ministers has decided the matter.