

EP Permit ref: B03/94

Variation ref: PPC 47/13

Variation Notice

From: Huntingdonshire District

Council ("the Council")

To: ⁽¹⁾

Sundown Products Ltd
Station Road
Tilbrook
Huntingdon
PE28 OJY

Huntingdonshire District Council ("the Council"), in the exercise of the powers conferred upon it by regulation 20 of the Environmental Permitting (England and Wales) Regulations 2010⁽²⁾ ('the 2010 Regulations') hereby gives you notice as follows-

The Council has decided to vary the conditions of permit reference B03/94 granted under regulation 13(1) of the 2010 Regulations in respect of the operation of the installation/~~mobile plant~~ at

Sundown Products Ltd
Station Road
Tilbrook
Huntingdon
PE28 3PA

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~~ 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 2010 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

Dated 17 March 2014

Signed



Designation Head of Environmental and Community Health Services

An authorised officer of the Council

(1) The operator at the address shown on permit / application

(2) SI 2010/675, as amended

(3) 1995 c.25.

Delete words in square brackets which do not apply.

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Schedule 1

Variation to the conditions of the permit	Date(s) on which the variation is to take place
Vary all permit conditions to comply with latest process guidance note.	17 March 2014

Signed on behalf of Huntingdonshire District

Council

Dated 17 March 2014

Signed



Designation Head of Environmental and Community Health Services

An authorised officer of the Council

EP Permit ref: B03/94
Variation ref: PPC 47/13

Schedule 2

Permit reference B03/94
~~variation notices~~

as varied by this notice and

~~and~~

}

(Insert amended or full consolidated permit).

PERMIT

Pollution Prevention and Control Act 1999

Environmental Permitting (England and Wales) Regulations 2010 as amended

Permit Reference: B03/94
As varied by: EPA08/01 & PPC11/08

Huntingdonshire District Council (the regulator) hereby permits Sundown Products Ltd Station Road Tilbrook Huntingdon PE28 OJY to operate an animal feed compounding process as defined in Part 2 of Schedule 1 to the EP Regulations Section 6.8 Part B, and as described below in accordance with the following conditions which shall apply forthwith.

Address of permitted activity: Sundown Products Ltd
Station Road
Tilbrook
Huntingdon
PE28 3PA

Location plan can be seen on B03/94 (a) Location plan

Description of Activity

The process consists of chopping, grinding, dedusted and pelletising at high pressure straw to turn into animal feed.

Cereal straw is delivered to the plant where it is weighed and tested for moisture content. The straw is mechanically unloaded and stack in the mill yard in dedicated storage bays, before being introduced to the process.

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 both enclosed to the 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. Some fugitive dust emissions occur from the bail transporters.

Straw is chopped to the required size and conveyed to the baling plant where it is passed through two de-dusters before a preservative is added depending on 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.

Fines from the de-dusters are conveyed to the pelleting for processing whilst remaining dust in the product steam is filtered, with the filtered air being discharged to atmosphere. The separated fines are mechanically conveyed to the pelleting plant for further processing together with fines from the de-dusters.

Straws 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 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.

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.

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 be loaded into bulk vehicles.

Conditions

Emissions and monitoring provisions

1. The emission requirements and methods and frequency of monitoring shall be complied with:

	Substance	Source	Emission limit	Type of monitoring	Monitoring frequency
(a)	Particulate matter	Entire site	None beyond site boundary	Downwind operator assessment	At least once when manufacturing
(b)	Particulate matter	Plant serving product coolers	50mg/m ³	Extractive ⁽¹⁾⁽²⁾	Annual
(1) The reference conditions are 273.1K, 101.3kPa, without correction for water vapour content.					
(2) All periodic monitoring shall be representative, and shall use standard methods.					

2. Cyclones serving product coolers shall be fitted with monitors that:
 - (a) Provide visible and audible alarms which activate on cyclone malfunction.
 - (b) Interlocked to shutdown process when alarm activities.

3. The operator shall notify the regulator at least 7 days in advance of any periodic monitoring exercise.
4. All periodic monitoring results shall be checked by the operator on receipt and sent to the regulator within 8 weeks of the monitoring being undertaken.
5. Any monitoring display required for compliance with the permit shall:
 - (a) Be visible to operating staff at all times.
 - (b) Have an alarm warning of failure or malfunction
 - (c) Record automatically when activated.
6. In the event of any monitoring results exceeding the limit in conditions X and Y or if there is a malfunction or breakdown of any equipment which might increase emissions the operator shall:
 - (a) Take corrective action immediately.
 - (b) Repeat the monitoring undertaken.
 - (c) Record actions taken.
7. 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.

Processing (tanks, vessels, grinders, coolers and extruders)

8. All process tanks and vessels shall be loaded to minimise spillage and disturbance to materials.
9. The cooler shall be vented to maintain negative pressure.
10. The regulator shall be notified of any new plant serving the coolers.

Odour control

11. The operator shall:
 - (a) Contain processing operations within a building and prevent the release of uncontrolled emissions.
 - (b) Extract odorous air.
 - (c) Have a written odour response plan.
12. The operator shall ensure that:
 - (a) The buildings, equipment and containers that hold raw materials and waste materials can be, and are, cleaned effectively, and are kept in good condition.
 - (b) Liquids drain appropriately.
 - (c) Vehicles and containers are cleaned appropriately.

Silos and bulk tanks where pneumatic transport is used

13. Silos and bulk containers of dusty materials shall not be overfilled and there shall be an overfilling alarm. When loading any silos, ensure delivery is at a rate which does not pressurise the silo.

14. All new or replacement silos shall be designed to emit less than 10mg/m³. A copy of the manufacturer's guarantee shall be supplied to the regulator.

Other bulk, loose, dry material – storage and loading and transport around the site

15. Dusty materials, including dusty wastes, shall only be stored in specified storage areas and their storage and transfer shall be subject to suppression and management techniques to minimise dust emissions. No potentially dusty materials, including wastes and finished product shall leave the site other than via methods to prevent dust from escaping off the vehicle.

16. All dusty materials, including wastes, shall be transferred in a manner to prevent dusts from escaping off site.

Maintenance

17. 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.

18. A record of any maintenance shall be kept.

Records and training

19. Written or computer records of all tests and monitoring shall:

- (a) Be kept by the operator for at least 24 months.
- (b) Made available for examination by the Regulator upon request.

20. Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit.

Best Available Techniques

21. The best available techniques shall be used to prevent or, where that is 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.

22. 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. 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.

Signed: ^{PL} Date: 17 March 2014
Head of Environmental and Community Health Services

GENERAL NOTES

1 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.

2 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.

3 Appeal

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

Appeals shall be addressed to:

The Planning Inspectorate
Environment Team, Major & Specialist Casework
Room 4/04 Kite Wing
Temple Quay House
2 The Square
Temple Quay
Bristol, BS1 6PN

4 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.

5 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.

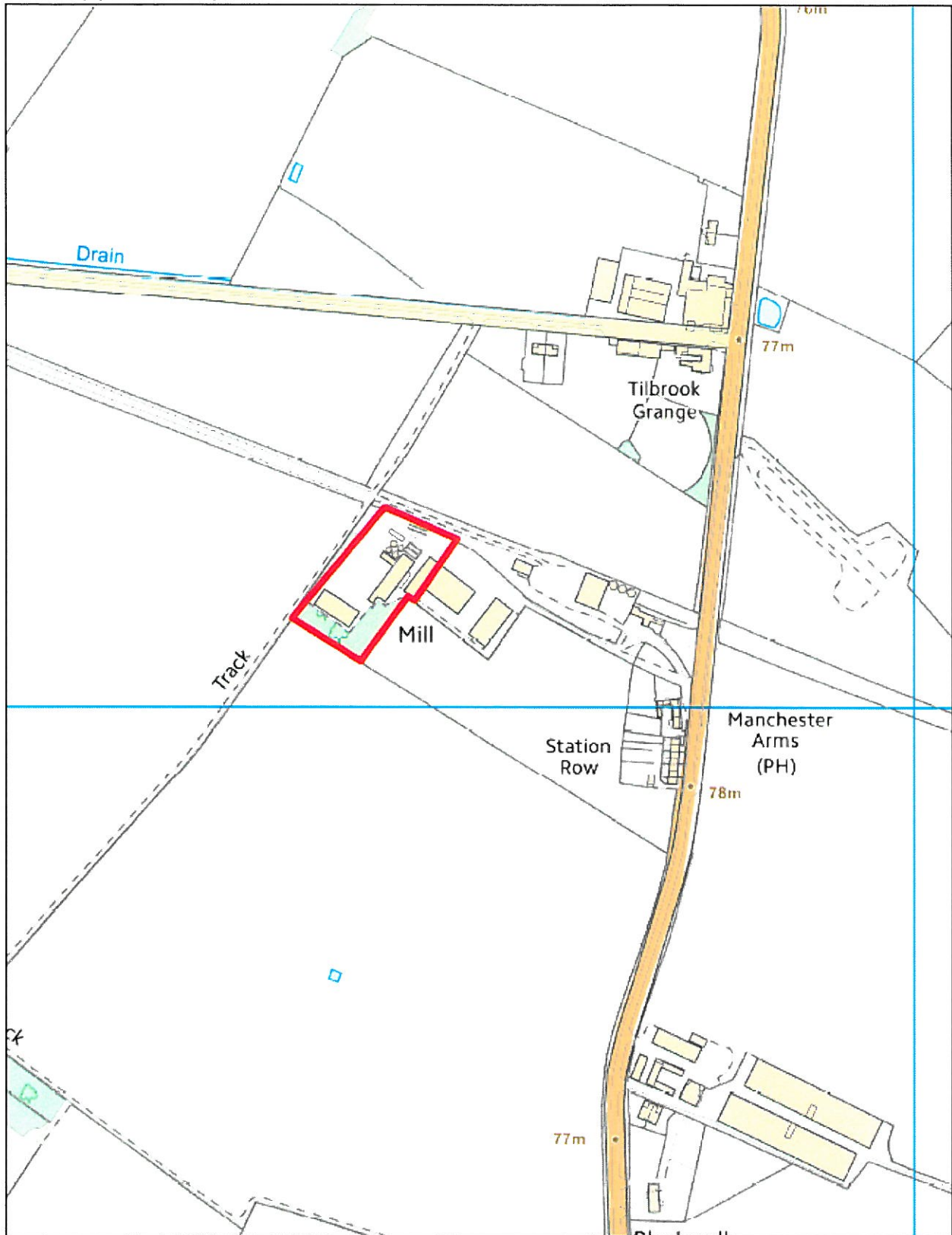
6 Other Legal Requirements

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.

7 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.

B03/94 (a) Location plan



Scale = 1:4,000

Date Created: 24/01/2014

Huntingdonshire
DISTRICT COUNCIL

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Ordnance Survey HDC 100020202

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, available at <http://www.defra.gov.uk/environment/quality/industrial/las-regulations/guidance/>.

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(2) of the 2010 Regulations. A person guilty of an offence under this regulation could be liable to (i) a fine of up to £50,000 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 2010 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 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 of 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 the Secretary of State or Welsh Minister with the following (see paragraphs 2(1) and (2) of Schedule 6 of the 2010 Regulations):

- 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 2010 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.