

# **Environment Agency permitting decisions**

## **Bespoke permit**

We have decided to grant the permit for The Abattoir operated by Janan Meat Limited.

The permit number is EPR/PP3836WB

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## **Purpose of this document**

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise we have accepted the applicant's proposals.

## **Structure of this document**

- Key issues
- Annex 1 the decision checklist
- Annex 2 the consultation and web publicising responses

## **Key issues of the decision**

### **Application**

The site is an existing single species (sheep) abattoir, located on the edge of an industrial estate to the north of Kingswinford, West Midlands.

Due to increased demand for products, the abattoir is expanding to increase the production capacity at the plant. This permit allows the operation of an installation for a single species (sheep) abattoir with a slaughtering capacity greater than 50 tonnes per day.

The basic process steps are outlined below:

- Receipt and lairage of live animals (sheep)
- Slaughtering (single slaughter line, capacity of 500 sheep per hour/ 5500 sheep per day) – including fleece removal, evisceration and bleeding.
- Deboning (capacity of less than 75 tonnes per day)
- Cutting of carcasses into portions – including segregation of prescribed animal by-products.
- Selection and packaging of portions
- Despatch of finished products
- Waste and animal by-product storage
- Waste and animal by-product despatch
- One small electrical steam raising boiler (72 kilowatts), three gas-fired hot water heaters (3 x 136.4 kilowatts) and seven kerosene fuelled pressure washer boilers (7 x 5.5 kilowatts)
- Refrigeration facilities
- Tray washing facilities

### **Site condition report**

A Site Condition Report (SCR) submitted as part of the application details the history of the site, based on historical maps. Prior to 1972 the maps show that there were mining activities in the area of the installation. From the 1970s onwards industrial development took place within the installation boundary and on the surrounding land. The 1980-1988 map depicts a building on the site which is labelled 'Abattoir'. The Oak Industrial Park, which borders the installation is shown on maps from 1992 onwards.

The nearest surface water receptor is a pond, Daffydingle Pool, which is situated approximately 325 metres north west of the installation boundary. There is also a water course, associated with Daffydingle Pond, which joins Smestow Brook. The applicant has provided a detailed site drainage plan which has been incorporated into the permit. There are no point source emissions to surface water at the facility.

The Etruria Formation (sandstone and Mudstone) underlying the site is classified as a secondary aquifer under the requirements of the Water Framework Directive. Groundwater vulnerability is classified as minor aquifer 'high' based on Groundwater Vulnerability maps. The installation does not lie within a groundwater source protection zone.

All process effluent and water from wash down of vehicles and the lairage passes through a 1 mm effluent screen prior to offsite discharge. Effluent is discharged to sewer under a Discharge Consent from Severn Trent Water. There are no anticipated emissions to ground, surface water or groundwater.

### **Odour**

Abattoirs have the potential to give rise to odour, to ensure that odour from the site does not impact upon any local receptors, the operator has submitted a draft odour management plan (OMP).

The draft OMP details the methods employed at the site, including monitoring and contingencies, to prevent, control and minimise odour pollution. The main points are as follows:

- The on site blood tank will be fitted with a carbon filter as odour abatement. A clean in place and level control system within blood tank will prevent old blood stagnating within the tank. Blood will also be removed regularly from the site, with collections three times a week.
- The site will operate a clean livestock policy, deliveries will be scheduled to minimise lairage vehicle waiting time and vehicles will be washed down prior to leaving site.
- Animals will be kept in the lairage for the minimum time possible and deliveries could be redirected in the event of prolonged shut down.
- Lairage operations will be managed to ensure animals have not been fed 12 hours prior to slaughter
- Operations from the process line (post lairage through to packing) will be undertaken within a building.
- All slaughter operations take place within a chilled building.
- Daily site inspections ensure key odour source locations are kept clean and activities being undertaken correctly, minimising the potential for odours from blocked drains, spills and the effluent screens.
- Animal By-Product skips/ trailers will be covered and removed from site on a daily basis.
- Any spills/leaks will be cleaned as soon as identified with designated spill kits, with effluent treatment infrastructure, animal by-products, blood tank and general waste areas inspected daily as a part of the Environmental Management System.
- Refrigeration systems will be maintained as part of a planned preventative maintenance programme under contract.
- Staff will undertake odour monitoring at the site boundary on a daily basis.

The supplied draft OMP has been reviewed by the Environment Agency. Based on the information provided, we are satisfied that the draft OMP contains suitable key measures. This should not be taken as confirmation that the details of equipment specification design, operation and maintenance are suitable and

sufficient. That remains the responsibility of the operator. We will not be in a position to fully accept the OMP until a completed version is submitted.

An improvement condition (IC1) has been included within the permit, this requires the operator to submit a completed odour management plan to the Environment Agency for review within 2 months of the permit issue. This must include final versions of all procedures and policies currently being developed as part of the site's Environment Management System.

### **Noise**

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise noise and vibration and to prevent pollution from noise and vibration.

The operator has confirmed the execution of the following measures to ensure that any potential noise impact from the installation is minimised:

- The majority of process operations occur within enclosed buildings. All potentially noise polluting machinery, boilers, refrigeration units and process lines will be contained within a building and regularly serviced and inspected to ensure operation will produce minimal noise
- Engines of standing vehicles are to be turned off. Drivers will be instructed to not rev engines unnecessarily or accelerate excessively when leaving the site, a site speed limit will also be in place
- Planned preventative maintenance will be undertaken on equipment to ensure that it remains correctly balanced and adjusted to prevent unnecessary noise and vibrations developing
- Livestock delivery vehicles are to be unloaded as quickly as possible. Once delivered the livestock will be transferred to the covered lairage in a timely manner
- Livestock will be kept in lairage for the minimum time possible and the processing of livestock will be carried out within a building with closed doors

### **Emissions to air**

The installation has one small electrical steam raising boiler (72 kilowatts), three gas-fired hot water heaters (3 x 136.4 kilowatts) and seven kerosene fuelled pressure washer boilers (7 x 5.5 kilowatts). The combined capacity of the eleven boilers is 519.7 kWh. Due to the size of the combustion plant we do not need to assess the combustion emissions to air. We can conclude that the emissions from the new boiler are considered insignificant.

## **Site drainage**

There is no discharge to surface water or ground water from the installation. All process effluent and yard run off, including water from wash down of vehicles and the lairage, passes through a 1mm effluent screen prior to discharge to sewer and subsequent treatment at Severn Trent Waste Water Treatment Works.

The discharge to sewer takes place under a trade effluent agreement, granted by Severn Trent Water, which includes specific parameters relating to effluent arising from the abattoir and limits effluent emissions for the following:

Temperature, pH, Suspended Solids, Chemical Oxygen Demand (COD), Sulphides, Phosphorous, and Oil. There is no interim storage of effluent prior to discharge to sewer.

To minimise the volume of discharge to sewer; rainwater is collected and reused on site where possible. Two 10,000 litre storage tanks are used to store harvested rainwater. This is the primary water used for external yard and vehicle washing operations.

## Annex 1: decision checklist

This document should be read in conjunction with the Duly Making checklist, the application and supporting information and permit/ notice.

| Aspect considered                             | Justification / Detail   | Criteria met<br>Yes |
|---|--|---------------------|
| <b>Consultation</b>                           |  |                     |
| Scope of consultation                         | The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.   | ✓                   |
| Responses to consultation and web publicising | <p>The consultation responses (Annex 2) were taken into account in the decision.</p> <p>The application was also publicised on our website from 29 January 2015 to 26 February 2015, no comments on the application were received in response to the publication.</p> <p>The decision was taken in accordance with our guidance.</p> | ✓                   |
| <b>Operator</b>                               |  |                     |
| Control of the facility                       | We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator.  | ✓                   |
| <b>European Directives</b>                    |  |                     |
| Applicable directives                         | All applicable European directives have been considered in the determination of the application.   | ✓                   |
| <b>The site</b>                               |  |                     |
| Extent of the site of the facility            | <p>The operator has provided a plan which we consider is satisfactory, showing the extent of the site of the facility.</p> <p>A plan is included in the permit and the operator is required to carry on the permitted activities within the site boundary.</p>   | ✓                   |

| Aspect considered   | Justification / Detail  | Criteria met<br>Yes |
|---|---|---------------------|
| Site condition report                                     | <p>The operator has provided a description of the condition of the site.</p> <p>We consider this description is satisfactory. The decision was taken in accordance with our guidance on site condition reports and baseline reporting under IED—guidance and templates (H5).</p>  | ✓                   |
| Biodiversity, Heritage, Landscape and Nature Conservation | <p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <ul style="list-style-type: none"> <li>• Two Sites of Special Scientific Interest (SSSIs) are located within 2 kilometres of the installation (<i>Ketley Claypit</i> and <i>Barrow Hill and Tansey Green</i>)</li> <li>• One Special Area of Conservation (SAC) is located within 10 kilometres of the installation (<i>Fens Pools</i>)</li> <li>• 30 local wildlife sites, one ancient woodland and 3 local nature reserves are located within 2 kilometres of the installation.</li> </ul> <p>Due to the small size of the boilers, this installation is not considered '<i>relevant</i>' for assessment under the Environment Agency's procedures which cover the Conservation (Natural Habitats &amp; con.) Regulations 1994 (Habitats Regulations). This was determined by referring to the Agency's guidance 'AQTAG014: Guidance on identifying '<i>relevance</i>' for assessment under the Habitats Regulations for installations with combustion processes.'</p> <p>A full assessment of the application and its potential to affect the site has been carried out as part of the permitting process. We consider that the application will not affect the site.</p> <p>We have not formally consulted on the application. The decision was taken in accordance with our guidance. An Appendix 11 form and an Appendix 4 form were completed, concluding no likely significant impact, and submitted to Natural England for information only.</p> | ✓                   |

| Aspect considered   | Justification / Detail   | Criteria met<br>Yes |
|---|--|---------------------|
| <b>Environmental Risk Assessment and operating techniques</b> |  |                     |
| Environmental risk  | <p>We have reviewed the operator's assessment of the environmental risk from the facility.</p> <p>The operator's risk assessment is satisfactory.</p> <p>The risk assessment provided with the application concludes that all significant risks are mitigated via operating techniques and infrastructure controls.</p> <p>Noise and Odour are discussed in the Key Issues section of this decision document.</p>  | ✓                   |
| Operating techniques  | <p>We have reviewed the techniques used by the operator and compared these with the relevant guidance notes.</p> <p>How to comply with your environmental permit:</p> <ul style="list-style-type: none"> <li>- Technical Guidance note EPR 6.10 Additional guidance for the food and drink sector</li> <li>- Technical Guidance note EPR 6.12 Additional guidance for the red meat processing sector (cattle, sheep and pigs)</li> </ul> <p>The key measures proposed by the Operator include the following:</p> <ul style="list-style-type: none"> <li>• The blood tank is constructed from stainless steel, bunded and fitted with a level alarm and clean in place system. The tank is also fitted with a carbon filter to abate displaced gases and is double skinned.</li> <li>• Carbon filters will be tested every six months, to ensure they are fit for purpose. As a minimum they be replaced every three years, irrespective of sample results.</li> <li>• At the end of each production run the troughs and sticking points are swilled with water. The swilling water is directed to the blood tank.</li> <li>• The blood is kept separate from other waste and effluent streams. The maximum quantity of blood is collected, thereby minimising the possibility of contamination of effluent downstream.</li> <li>• Planned preventative maintenance for all relevant equipment, including the refrigerators and boilers.</li> <li>• All process effluent and yard run off passes via the</li> </ul> | ✓                   |

| Aspect considered            | Justification / Detail   | Criteria met<br>Yes |
|------------------------------|--|---------------------|
|                              | <p>effluent screen.</p> <ul style="list-style-type: none"> <li>• The impermeable, sealed floors within the production areas are fitted with 6mm mesh floor grates and catch pots.</li> <li>• Where possible rainwater is collected and reused on site.</li> <li>• Chemicals are stored internally, within a lockable store. The majority of chemicals stored on site are kept within small containers (less than 50 litres).</li> <li>• Each of the integrally bunded fuel storage tanks is fitted with a level switch in the outer wall.</li> <li>• The lairage area is dry cleaned weekly and the bedding and manure from the lairage are removed without the use of additional water to minimise secondary waste production.</li> <li>• All bulk liquid storage tanks are fitted with integral enclosed bunds providing at least 110 percent bund capacity.</li> <li>• The enclosed integral bund prevents rainwater ingress to the bund.</li> </ul> <p>The proposed techniques for priorities for control are in line with the benchmarks contained in the TGN and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs and BAT Conclusions.</p> |                     |
| <b>The permit conditions</b> |  |                     |
| Improvement conditions       | <p>Based on the information on the application, we consider that we need to impose improvement conditions.</p> <p>We have imposed improvement conditions to ensure that:</p> <ul style="list-style-type: none"> <li>➤ the appropriate measures are in place to prevent pollution from odour.</li> <li>➤ appropriate measures are in place to ensure that accidents that may cause pollution are minimised.</li> </ul> <p>IC1 requires the operator to provide a completed odour management plan. This plan must include final versions of all relevant procedures and policies being developed as part of the Environment Management System.</p>   | ✓                   |

| Aspect considered             | Justification / Detail  | Criteria met<br>Yes |
|-------------------------------|---|---------------------|
|                               | IC2 requires the operator to provide an accident management plan. This plan must also include final versions of all relevant procedures and policies being developed as part of the Environment Management System.  |                     |
| Incorporating the application | <p>We have specified that the applicant must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process.</p> <p>These descriptions are specified in the Operating Techniques table in the permit.</p>  | ✓                   |
| Reporting                     | <p>We have specified reporting in the permit.</p> <p>We have included a requirement for the annual reporting of energy and water usage on the site, to ensure that it is operated efficiently.</p> <p>We have also required the reporting of annual tonnage of meat production, and the number and annual tonnage of sheep slaughtered.</p> | ✓                   |
| Operator Competence           |   |                     |
| Environment management system | There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.  | ✓                   |
| Relevant convictions          | <p>The National Enforcement Database has been checked to ensure that all relevant convictions have been declared.</p> <p>No relevant convictions were found.</p> <p>The operator satisfies the criteria in RGN 5 on Operator Competence.</p>  | ✓                   |

| Aspect considered   | Justification / Detail  | Criteria met |
|---------------------|---|--------------|
|                     |   | Yes          |
| Financial provision | There is no known reason to consider that the operator will not be financially able to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence. | ✓            |

## **Annex 2: Consultation and web publicising responses**

Summary of responses to consultation and web publication and the way in which we have taken these into account in the determination process.

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| <b>Response received from</b><br>Dudley Metropolitan Borough Council, Directorate of Environment ,Economy and Housing. Letter (sent electronically) dated 19 February 2015   |
| <b>Brief summary of issues raised</b>  |
| <b>Odour</b><br>Since 1999 the Council has received 346 complaints relating to alleged odour from the abattoir. Odour complaints about the abattoir from both residents and businesses in the nearby vicinity are received by the Council during the spring and summer. However, there have been no substantiated complaints in recent years.<br><br>In 2003, investigations by the Council established that odour from the storage and handling of waste products and by-products arising from the slaughtering process at the abattoir constituted a statutory nuisance and an Abatement Notice was served under The Environmental Protection Act 1990. Actions were taken to resolve the particular causes of nuisance odour at that time and no statutory nuisance has been identified by the Council since the service of the Abatement Notice in 2003. In recent years, officer observations in response to the vast majority of complaints have not resulted in any detectable odours or odours which could be attributed to the abattoir operations. |
| <b>Noise</b><br>3 complaints relating to noise from the abattoir have been received by the Council since 2005, with 2 of these complaints being in 2014 from the same complainant and relating to noise from delivery vehicles to the abattoir. The most recent complaint in October 2014 related to alleged noise from refrigerated delivery vehicles during night time/early morning hours. This complaint was dealt with informally and, to date, the noise complaint has not been substantiated with any evidence to suggest the noise could constitute a statutory nuisance.  |
| <b>Summary of actions taken or show how this has been covered</b>  |
| <b>Odour</b><br>The standard odour condition is included within the permit. This condition states that emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency.<br>The operator has also submitted an odour management plan as part of their permit application. This is discussed in the key issues section of this decision document.   |
| <b>Noise</b><br>The standard noise and vibration condition is included the permit. This condition states that emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an  |

authorised officer of the Environment Agency.

In addition, the operator has detailed a number of noise abatement techniques in their variation application. See key issues section for more information.

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| <b>Response received from</b>  |
| Dudley Metropolitan Borough Council, Planning Services Team, emailed received 4 March 2015 |
| <b>Brief summary of issues raised</b>  |
| No comments  |
| <b>Summary of actions taken or show how this has been covered</b>                          |
| No further action required   |

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| <b>Response received from</b>  |
| Dudley Metropolitan Borough Council, Office of Public Health, letter received via email 17 March 2015  |
| <b>Brief summary of issues raised</b>  |
| The abattoir is in a predominantly commercial area with few dwellings in the vicinity, but there is a leisure walk nearby. Recommend that the Environmental Permit should contain conditions to ensure that odour from animals or animal products do not impact upon public health.  |
| They have no other significant concerns provided that all appropriate measures are in place to control pollution.  |
| <b>Summary of actions taken or show how this has been covered</b>  |
| The standard odour condition is included within the permit. This condition states that emissions from the activities shall be free from odour at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency.<br>The operator has also submitted an odour management plan as part of their permit application. This is discussed in the key issues section of this decision document. |

We also consulted with the Health and Safety Executive, Public Health England and the Food Standards Agency, however no responses were received.