

CH Christopher Humphreys
To: Jason Redmond

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Mon 07/10/2024 16:05

Good afternoon Jason,

The Environmental Permitting (England and Wales) Regulations 2016 (as amended)

Thank you for your time this morning to undertake a check visit to the installation and discuss progress update on your Environmental Permit Corrective Action Plan.

The visit started with observations of the site. Weather was overcast, but brightening up and the ground was wet. There was a breeze across the site.

Operations were active in Building A, but no activity was taking place in Building B at the time of the observations.

No visible emissions were observed from any of the emission points. A delivery was in progress to silo 4, and to a silo at the eastern end of the site - no emissions were noted.

Material was all within the confines of the stock bays. Yard areas were clean with the road sweep currently in operation.

Inside the process buildings, the trackways for both vehicles and pedestrian access were clean. Deposits are noted to still be present along areas of stock holdings however changes to stock management are looking to improve this and should become clearer in future.

There is notable improvement to general house-keeping around the site. No significant source of fugitive emissions from within the production building were noted. An issue with cleaning out the scales has been identified by the Operator which requires some parts of the scales to have the dust blown out as the vacuum alone is inadequate. Operator is to review these operations to minimise and contain dust generation.

Ongoing upgrades to dust extraction plant is ongoing. The former shaker unit on the Arodo packing plant is in the process of being replaced. Ducting has been investigated and identified to have resulted in accumulations of material likely reducing the effectiveness of the extraction. This is to be included on routine maintenance to inspect ductwork for accumulations, but in the long-term looking to have the ducting to this plant reviewed to improve efficiency.

Action updates:

Emissions monitoring – Planned to be undertaken November/ December 2024, prior notification to be provided once dates are known.

Daily environmental checks implemented – covers visible emissions from emission points and silos, from fugitive sources, including yard, stockpiles, process buildings, silos and any deposits around delivery points, silos, conveyors etc... Space is provided to record issues and document with photographs.

Silo checks – These are not undertaken on all silos as at present and must be re-instated in the shortest possible time to comply with the requirements of the permit. Not all silo tops are readily accessible and access arrangements are being reviewed, along with systems to reduce the need for physical checks, full 'fail-safe' design. Currently one provider has been in to put forward a design and a second is to come and review the current systems and propose any amendments. The delay to upgrading to a fail-safe system should not delay the requirement to undertake the required checks in the meantime.

Silo 4 – process is due to be changed. Currently silo 4 discharges into screw which feeds a conveyor resulting in fugitive emissions of dust. This is to be amended imminently and emissions will be reviewed.

Silo 4 – emissions as a result of back-pressure was temporarily rectified, however, it has subsequently been reported again. This is to be reviewed to determine route cause so fix can be applied, including review of the size of the PRV as a recent visit from a silo company has indicated this could be too small.

Silo 11 – new identification sign fitted and new rubber seal fitted between the bottom of the silo and screw conveyor inlet. Improved rubber seals are being purchased when fail in future to provide increased longevity and reduce spillages and downtime.

Maintenance system – Currently under review. New member of staff being contracted in to work on developing an inhouse maintenance system, which should cover all plant and equipment that could result in emissions to air.

Stack heights – currently with the architect to prepare the planning application for submission.

Silo 2 loading hopper is still awaiting the new hopper to be installed to aid in reducing fugitive emissions of dust.

Training – new centralised training matrix/ records and implementation of training is in the process of being developed and rolled out.

It is projected that the majority of outstanding actions are on target for completion by the end of February 2025, some projects are anticipated could take longer, such as the review of extraction efficiency, review of silo fail-safe systems and stack height improvements.

Actions

Silo operating procedures must be reviewed without delay, including re-commencement of checks on silo safety systems, condition 5.9.

Kind regards,

Christopher Humphreys
Pollution and Environment Officer