

Permit (Application) Number: PPC/W/0020057

Applicant: Dunbia (UK)

OFFICIAL

Dunbia (UK)

**Dunbia Highland Meats
Blakely Road
Saltcoats KA21 5JQ**

Permit Variation

PPC/W/0020057

Draft for Consultation

OFFICIAL

CONTENTS

DUNBIA (UK).....	1
CONTENTS.....	2
1 NON TECHNICAL SUMMARY OF DETERMINATION.....	3
2 EXTERNAL CONSULTATION AND SEPA'S RESPONSE	3
3 ADMINISTRATIVE DETERMINATIONS.....	5
4 INTRODUCTION AND BACKGROUND	6
4.1 Historical Background to the activity and variation	6
4.2 Description of activity.....	6
Outline details of the Variation applied for	6
4.3 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.	6
4.4 Identification of important and sensitive receptors.....	6
5 KEY ENVIRONMENTAL ISSUES.....	7
5.1 Summary of significant environmental impacts	7
5.2 Implications of the Variation on - Point Sources to Air	7
5.3 Implications of the Variation on - Point Source Emissions to Surface Water and Sewer	7
5.4 Implications of the Variation on - Point Source Emissions to Groundwater	7
5.5 Implications of the Variation on - Fugitive Emissions to Air.....	7
5.6 Implications of the Variation on – Odour.....	7
5.7 Implications of the Variation on – Management.....	8
5.8 Implications of the Variation on - Raw Materials	8
5.9 Implications of the Variation on - Raw Materials Selection.....	8
5.10 Implications of the Variation on - Waste Minimisation Requirements.....	8
5.11 Implications of the Variation on - Water Use.....	9
5.12 Implications of the Variation on - Waste Handling	9
5.13 Implications of the Variation on - Waste Recovery or Disposal	9
5.14 Implications of the Variation on – Energy	9
5.15 Implications of the Variation for - Accidents and their Consequences.....	9
5.16 Implications of the Variation for – Noise	9
5.17 Implications of the Variation for – Monitoring.....	10
5.18 Implications of the Variation for – Closure.....	10
5.19 Implications of the Variation for - Site Condition Report (and where relevant the baseline report)10	
5.20 Implications of the Variation for - Consideration of BAT	10
6 OTHER LEGISLATION CONSIDERED	11
7 ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH	11
8 DETAILS OF PERMIT	12
9 EMISSION LIMIT VALUES OR EQUIVALENT TECHNICAL PARAMETERS/ MEASURES	12
10 PEER REVIEW	13
11 FINAL DETERMINATION.....	13
12 REFERENCES AND GUIDANCE	13

1 NON TECHNICAL SUMMARY OF DETERMINATION

This variation will permit the relocation of the sites Effluent Treatment Plant, incorporating effluent balance tank, sludge tank, Dissolved Air Flotation (DAF) unit and associated equipment to another area within the current site boundary.

New pumping pipework will be installed from the current screening equipment to the new effluent treatment plant. As part of the relocation works a new, larger, balancing tank and sludge tank will be installed.

Discharge volumes to the sewer will not increase but the larger balance tank will allow for a greater retention period of untreated effluent and minimise variations in the effluent flow and composition, producing greater consistency in discharge quality.

The current discharge location point to the Scottish Water sewer will remain in the same location.

Glossary of terms

BAT	-	Best Available Techniques
CO	-	Coordinating Officer
DAF	-	Dissolved Air Flotation
ELV	-	Emission Limit Value

2 EXTERNAL CONSULTATION AND SEPA'S RESPONSE

Is Public Consultation Required - Yes

Advertisements Check:	Date	Compliance with advertising requirements
Edinburgh Gazette	20/01/2023	Yes
Irvine Times	24/01/2023	Yes

Officer checking advert: CO

No. of responses received: 0 (Zero)

Summary of responses and how they were taken into account during the determination:

No response, no action required.

Summary of responses withheld from the public register on request and how they were taken into account during the determination:

No response, no action required.

Is PPC Statutory Consultation Required –

Food Standards Agency: Not Consulted. Changes do not have implications relevant to the Food Standards Agency.

Health Board: Consulted 19 December 2022.
No response received

Local Auth: Consulted 19 December 2022.
No response received

<p>Scottish Water: Consulted 19 December 2022. Responded 13 January 2023: <i>'We have reviewed the variation application referenced above and as there are no changes to the discharge volume, composition or point of connection to the public sewer, Scottish Water have no comments.'</i></p>	
<p>Health and Safety Executive: Not Consulted. Changes do not have implications relevant to the HSE.</p>	
<p>Scottish Natural Heritage (PPC Regs consultation): Consulted 19 December 2022. Responded 22 December 2022: <i>'We are satisfied that there will not be any detrimental impacts on the range of national or international designations for which NatureScot carries responsibility such as Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and National Scenic Areas. We have no comments to make in respect of this application'</i></p>	
<p>Discretionary Consultation - None</p>	
<p>Enhanced SEPA public consultation - None</p>	
<p>'Off-site' Consultation - None</p>	
<p>Transboundary Consultation - No</p>	
<p>Public Participation Consultation - Yes</p>	
<p>STATEMENT ON THE PUBLIC PARTICIPATION PROCESS The Pollution Prevention and Control (Public participation)(Scotland) Regulations 2005 requires that SEPA's draft determination of this application be placed on SEPA's website and public register and be subject to 28 days' public consultation. The dates between which this consultation took place, the number of representations received and SEPA's response to these are outlined below.</p>	
<p>Date SEPA notified applicant of draft determination</p>	<p>16 February 2023</p>
<p>Date draft determination placed on SEPA's Website</p>	<p>24 February 2023</p>
<p>Details of any other 'appropriate means' used to advertise the draft.</p>	
<p>Date public consultation on draft permit opened</p>	<p>24 February 2023</p>
<p>Date public consultation on draft permit consultation closed</p>	
<p>Number of representations received to the consultation</p>	
<p>Date final determination placed on the SEPA's Website</p>	
<p>Summary of responses and how they were taken into account during the determination:</p>	

3 ADMINISTRATIVE DETERMINATIONS

Determination of the Schedule 1 activity

The primary Schedule 1 remains as described in the PPC 2012 regulations, SECTION 6.8, Treatment of animal and vegetable matter and food industries, PART A, (c) Slaughtering animals in slaughterhouses with a carcass production capacity of more than 50 tonnes per day.

In addition to this activity a second activity has been added to the permit as described in the PPC 2012 regulations, SECTION 5.4: Disposal, recovery or a mix of disposal or recovery of non-hazardous waste, PART A, (a) Disposal of non-hazardous waste at an installation with a capacity exceeding 50 tonnes per day by one or more of— (ii) physico-chemical treatment,

Determination of the stationary technical unit to be permitted:

There are no changes to the primary Schedule 1 activity since the variation PPC/W/0020057/V1 issued on 24 October 2008.

The second Schedule 1 activity, to be added as part of this variation, is the result of an upgrade and relocation of the existing Effluent Treatment Plant (ETP) which originally operated as a directly associated activity at the site.

The new ETP will include the installation of a new, larger, balancing tank and sludge tank. Discharge volumes to the sewer will not increase but the larger balance tank will allow for a greater retention period of untreated effluent and minimise variations in the effluent flow and composition, producing greater consistency in discharge quality.

The introduction of the larger balancing tank has increased the potential treatment capacity for the ETP to a level where it falls above the threshold required of a Schedule 1 activity under SECTION 5.4: PART A, (a), (ii).

Determination of directly associated activities:

As a result of the changes to the stationary technical unit described above the directly associated activities will be modified to remove reference to the ETP. An additional directly associated activity will be added to refer to the disposal of the sludge generated by the ETP. Solids screened from the ETP will be added to the mixed trailer prior to collection for disposal.

Determination of 'site boundary'

There are no changes to the site boundary from the original permit determination.

4 INTRODUCTION AND BACKGROUND

4.1 Historical Background to the activity and variation

The site first obtained a permit on 15 December 2004 and has been operating as a PPC installation since that date.

The initial permit was varied in October 2008 to update the format and include conditions relevant to items included on the initial 2004 permit as 'Upgrade Requirements'

Since the previous variation to the permit, PPC/W/0020057/V1 issued on 24 October 2008 the company has undergone a name change from Highland Meats – A Division of Dawn Meats (UK), to Dunbia Highland Meats. A certificate verifying the name change is included as part of the application.

4.2 Description of activity

The primary Schedule 1 remains as described in the PPC 2012 regulations, SECTION 6.8, Treatment of animal and vegetable matter and food industries, PART A, (c) Slaughtering animals in slaughterhouses with a carcass production capacity of more than 50 tonnes per day.

Outline details of the Variation applied for

In addition to the primary Schedule 1 activity a second activity has been added to the permit as described in the PPC 2012 regulations, SECTION 5.4: Disposal, recovery or a mix of disposal or recovery of non-hazardous waste, PART A, (a) Disposal of non-hazardous waste at an installation with a capacity exceeding 50 tonnes per day by one or more of— (ii) physico-chemical treatment,

The second Schedule 1 activity, to be added as part of this variation, is the result of an upgrade and relocation of the existing Effluent Treatment Plant (ETP) which originally operated as a directly associated activity at the site.

The new ETP will include the installation of a new, larger, balancing tank and sludge tank. Discharge volumes to the sewer will not increase but the larger balance tank will allow for a greater retention period of untreated effluent and minimise variations in the effluent flow and composition, producing greater consistency in discharge quality.

The introduction of the larger balancing tank has increased the potential treatment capacity for the ETP to a level where it falls above the threshold '*a capacity exceeding 50 tonnes per day*' required of a Schedule 1 activity under SECTION 5.4: PART A, (a).

4.3 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.

No guidance or directions have been issued to SEPA by the Scottish Ministers under Reg.60 or 61 in respect of this variation.

4.4 Identification of important and sensitive receptors

There is one SSSI within 2km of the site:

Ardrossan to Saltcoats Coast

Designation: Site of Special Scientific Interest

Designation Status: Current

Lead NatureScot Area: National Operations West Central

Local Authority: North Ayrshire

Last Designated: 19 Mar 1987

NatureScot Site Code: 79 Documented Area: 53 ha

EU Site Code: 135539

Stevenston Beach, Local Nature Reserve is approx. 370m East Southeast of the site

The site is immediately adjacent to Auchenhavrie Golf club to the North of the site and a football ground to the East of the site.

The nearest housing is approx. 150m Northwest of the site at James Millar Crescent.

5 KEY ENVIRONMENTAL ISSUES

5.1 Summary of significant environmental impacts

There are no changes to the potential for significant environmental impact because of this variation. The changes to the permit reflect the relocation of the ETP for wastewater to another location within the site boundary. As part of the relocation there will be larger balancing tank and sludge tank will be installed. The larger balance tank will allow for a greater retention period of untreated effluent, which in-turn will attenuate variations in flow and composition, helping to produce greater consistency in discharge quality. Discharge volumes to the sewer will not increase because of this change.

5.2 Implications of the Variation on - Point Sources to Air

There are no changes to the point sources to air because of this variation. The changes to the permit reflect the relocation of the ETP for wastewater to another location within the site boundary. Condition '3.2 Air emission conditions' of the current permit refers to Table 3.1 which contains both conditions relating to boiler emission points and olfactory assessment of odours adjacent to specific functions within the site. These will remain and will be updated, where required, to reflect the changes from the relocation of the ETP. The permit also contains condition '3.3 Odour Conditions' which more particularly relate to odours and include the requirement for an 'odour management plan' and daily monitoring of odours both at the site boundary and downwind of the site.

5.3 Implications of the Variation on - Point Source Emissions to Surface Water and Sewer

There are no changes on the point source emissions to surface water or sewer because of this variation. The larger balance tank will allow for a greater retention period of untreated effluent, which in-turn will attenuate variations in flow and composition, helping to produce greater consistency in discharge quality. The discharges to the foul sewer will remain within their current agreement of Scottish Water.

The new ETP and tanks will be wholly located on hardstanding. The hardstanding run off will be considered as foul water across the entire slab and therefore naturally self-drain back via gullies to the process effluent system minimising the potential for any potential impact on surface water.

5.4 Implications of the Variation on - Point Source Emissions to Groundwater

There are no point source emissions to groundwater from this facility. As mentioned at 5.3 above the new ETP and tanks will be wholly located on hardstanding. The hardstanding run off will be considered as foul water across the entire slab and therefore naturally self-drain back via gullies to the process effluent system minimising the potential for any potential impact on groundwater.

5.5 Implications of the Variation on - Fugitive Emissions to Air

As this variation is to relocate the existing ETP to another location within the existing site boundary there are no additional sources which could contribute to potential fugitive emissions to air. Implications of the Variation on - Fugitive Emissions to Water

5.6 Implications of the Variation on – Odour

As this variation is to relocate the existing ETP to another location within the existing site boundary there are no additional sources which could contribute to potential odour emissions. The increase in size of the new balancing tank and sludge tank increases the ability to store a

larger quantity of potentially odorous material but these tanks will be covered to minimise any fugitive odours.

As previously discussed in section 5.2 above condition '3.2 Air emission conditions' of the current permit refers to Table 3.1 which contains both conditions relating to boiler emission points and olfactory assessment of odours adjacent to specific functions within the site. These will remain and will be updated, where required, to reflect the changes from the relocation of the ETP. The permit also contains condition '3.3 Odour Conditions' which more particularly relate to odours and include the requirement for an 'odour management plan' and daily monitoring of odours both at the site boundary and downwind of the site. The odour management plan includes reference to recording of details of odour complaints, and the operator response and findings from odour assessments in response to complaints.

In addition, the operator is required to carry out a systematic assessment of odour emissions associated with the installation at least every 2 years and report the findings of this assessment to SEPA.

5.7 Implications of the Variation on – Management

The Dunbia site has an Environmental Management System accredited against the ISO 14001 and is accredited to ISO 50001 for its Energy Management Standard (EnMS). This demonstrates the commitment of the management team, including senior management, in delivering the company's environmental policy and ensuring the continuous improvement of the environmental performance of the installation.

These systems, along with the data returns required by the permit, are reviewed as part of the regulatory effort for the site and to ensure compliance with the requirements of BAT. With reference to the upgrade of the ETP The site currently has an Incident Risk Assessment & Response Plan in place, detailing potential incidents and their consequences, as well as the current safeguards to prevent them occurring. The existing ETP has been assessed and included on this Plan.

Dunbia has reviewed the existing safeguards in respect of the new ETP and has deemed them sufficient for ensuing effective management of the new installations.

The safeguards include, but are not limited to:

- Equipment and plant associated with the ETP are inspected as part of the ETP Checklist
- Effluent discharge is sampled and analysed internally daily to ensure effluent is treated to the required standard.
- Effluent discharge passes through a meter and is recorded to ensure discharge volumes remain within consent levels as stated within environmental permit.
- Site Service & Maintenance personnel are trained to respond to spillage events and spill kits are available at site.
- The area surrounding the ETP tanks is an area of hard standing and is serviced by foul drainage, so effluent from a tank that failed can be collected and returned to the foul drainage network.

5.8 Implications of the Variation on - Raw Materials

No new raw materials will be required to be held on site to facilitate the relocation and upgrade of the ETP. The quantities of raw materials currently used for Effluent Treatment will also not change.

5.9 Implications of the Variation on - Raw Materials Selection

There are no implications for raw material selection because of this variation.

5.10 Implications of the Variation on - Waste Minimisation Requirements

As detailed in the documents HMEVC2.3 & HMEVC2.4, supplied in support of the application, there will be no changes or additions to the current types of waste stream arising from the changes in site operation.

Information on how the waste streams are currently recovered/re-used/disposed of is included as part of the documentation supplied as part of the application and data relating to the waste streams reviewed as part of ongoing regulatory effort.

5.11 Implications of the Variation on - Water Use

There will be no increase in water use on site because of this variation. The larger balance tank will allow for a greater retention period of untreated effluent, which will, in-turn, attenuate variations in flow and composition, helping to produce greater consistency in discharge quality. Discharge volumes will not increase because of the onsite changes

5.12 Implications of the Variation on - Waste Handling

As detailed in 5.11 above Information on how the waste streams are recovered/re-used/disposed of is included as part of the documentation HMEVC2.3 & HMEVC2.4, supplied in support of the application and data relating to the waste streams reviewed as part of ongoing regulatory effort.

5.13 Implications of the Variation on - Waste Recovery or Disposal

As detailed in 5.11 above Information on how the waste streams are recovered/re-used/disposed of is included as part of the documentation HMEVC2.3 & HMEVC2.4, supplied in support of the application and data relating to the waste streams reviewed as part of ongoing regulatory effort.

5.14 Implications of the Variation on – Energy

As there are no changes to types of process and the equipment involved, there are no new sources of energy required because of the proposed variation. Projections on energy use of the new ETP by Dunbia and contractor estimate there will be a total ETP energy consumption increase of 10%.

The Dunbia site is also the subject of a Climate Change Levy Agreement as follows:
 UNDERLYING CLIMATE CHANGE AGREEMENT FOR THE MEAT SECTOR Agreement Dated:
 12th day of October 2021
 Agreement Identifier: BMPA/T00174 v5TU
 Identifier: BMPA/T00174

5.15 Implications of the Variation for - Accidents and their Consequences

The Dunbia facility has an onsite Health and Safety Manager as part of the senior management team.

Dunbia operate a comprehensive health and safety process and have supplied a document HMEVC4.1 Environmental & Human Health Risk Assessment as part of the application. The risk assessment provides details on day-to-day operational risks but also includes information to cover the construction phase of the new ETP.

In addition to the existing site policies and safeguards section the permit contains conditions that requires the Operator to prepare, record and implement plans designed to prevent the release of any pollutants from the site (Incident prevention and mitigation plan). These permit conditions have been reviewed and revised as part of this variation

5.16 Implications of the Variation for – Noise

Dunbia currently has a noise management plan as part of their Environmental Management System. This plan will be reviewed and amended following implementation of the proposed changes and will include, but not be limited, the following:

- Noise controls for the existing ETP, will continue to be applicable on the new installations.
- All new motors and pumps installed along with the screw press will be identified as a noise source. Controls identified will include ongoing service and maintenance as per

manufacturers guidance. All pumps and motors will have appropriate covers for protection from weather elements and to restrict noise emissions. Additionally, new equipment will be VSD controlled to ensure any potential noise is intermittent.

Collections of waste originating from the ETP via tanker will continue to occur during daytime hours. Controls identified for the removal of waste will include turning off engines while stationary and following the documented sludge collection procedures.

Moreover, in the event of a complaint being received regarding a noise event, the site has in place a response protocol which includes recording the event details, identifying the root cause and detailing all remedial actions to be completed.

All designs and workmanship for the construction phase shall comply with latest B.S. and EN codes of practice and all materials used in the construction shall be of industry standard. All equipment supplied will be CE compliant and be clearly marked as such.

5.17 Implications of the Variation for – Monitoring

As detailed in HMEVC1.2 Non-Technical Summary and HMEVC4.1 Environmental & Human Health Risk Assessment supplied in support of the application the proposals do not contribute any additional environmental risk or hazard. The proposed changes will have a positive effect on the effluent treatment process and subsequent discharges from site.

In-line with the requirements of ISO 14001, the sites EMS will be reviewed updated to reflect the changes to the site. The proposed changes are detailed in the document HMEVC2.9 Changes to Documented Systems, supplied in support of the application. The changes detailed in this document relate to the monitoring of emissions, specifically the Assessment of Noise and Vibrations, Assessment of Odour Emissions and Waste Management Review.

Reporting of these parameters to SEPA will continue as per the frequency detailed in the current PPC Permit.

5.18 Implications of the Variation for – Closure

Dunbia currently has a Site De-commissioning Plan which details scenarios arising as a result of permanent closure or where ownership is passed to another company that does not require some or all of the facilities currently available.

The plan was developed to comply with condition 2.9 of PPC Permit PPC/W/0020057 and to ensure the site control all aspects of its activities during closure, to prevent or minimise any potential pollution risks or environmental hazards.

The plan has been reviewed and no amendments have been identified as being required, with all controls and procedures in place for the decommissioning still relevant.

5.19 Implications of the Variation for - Site Condition Report (and where relevant the baseline report)

As the existing permit was issued prior to the PPC2012 regulations there are no existing conditions requiring monitoring of soil and groundwater at the site.

Condition 2.7 of the existing permit details the precautionary measures to be taken on site to minimise and document potential risks to soil and groundwater at the site.

Further conditions contained within the permit, 2.9 Decommissioning, detail the maintenance of a site decommissioning plan which is required to be submitted prior to closure of the site. The site decommissioning plan would require inclusion of any potential contamination of the site and if necessary, sampling of soil and groundwater would be required at that time to demonstrate that no environmental impact had occurred.

5.20 Implications of the Variation for - Consideration of BAT

The Dunbia site currently use a DAF wastewater treatment system to good effect and as such it is a proven technology on the site. DAF systems are designed to remove contaminants such as

total suspended solids (TSS), biochemical oxygen demand (BOD), and oils and greases (O&G) from a wastewater stream.

The Best Available Techniques in the Slaughterhouses and Animal By-products Industries 2005 guidance, section 2.3, recognises DAF treatment systems as a suitable and effective methodology.

DAF systems can remove 15 % of the BOD load and 70 % of the suspended solids, without chemicals and 50 - 65 % of the BOD and 85 - 90 % of the suspended solids, with chemicals.

The larger balance tank will allow for a greater retention period of untreated effluent, which in-turn will attenuate variations in flow and composition, helping to produce greater consistency in discharge quality to the foul sewer

6 OTHER LEGISLATION CONSIDERED

Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994

Is there any possibility that the proposal will have any impact on site designated under the above legislation?

No. There is one SSSI within 2km of the site, Ardrossan to Saltcoats Coast, and NatureScot have been consulted on the proposals. As the proposed changes to site are for an upgrade to an existing effluent treatment plant it is not foreseen that there will be any change to the environmental impact.

Justification: NatureScot have concurred that: *'We are satisfied that there will not be any detrimental impacts on the range of national or international designations for which NatureScot carries responsibility such as Sites of Special Scientific Interest, Special Protection Areas, Special Areas of Conservation and National Scenic Areas.*

We have no comments to make in respect of this application'

This response was received in response to the consultation request issued on 19 December 2022.

Screening distance(s) used – 2km

7 ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH

How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account?

The facility has operated at this location for more than 18 years and there is no direct discharge from the facility to the water environment.

The site has been assessed as part of a previous applications/variation and appropriate conditions are included within the existing permit to ensure environmental protection. The energy use and water consumption figures are assessed as part of regulatory effort for the site.

The information supplied in pursuance of this variation to the PPC permit has been deemed as sufficient to meet these regulatory requirements and no further Environmental Impact Assessment has been carried out.

How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account?

The site is below the thresholds required for Regulation 7 to apply.

8 DETAILS OF PERMIT

Do you propose placing any non standard conditions in the Permit: No

Do you propose making changes to existing text, tables, or diagrams within the permit? Yes

Outline of change: A new Condition 1.1.3.2 has been added

Details including justification: The added condition 1.1.3.2 refers to the additional schedule 1 activity taking place at the site, namely the Disposal of non-hazardous waste at an installation with a capacity exceeding 50 tonnes per day by physico-chemical treatment.

Outline of change: Condition 1.1.5.12 has been revised to update the content.

Details including justification: The updated condition includes reference to the new equipment to be installed as part of the refurbishment and relocation of the ETP, it includes the descriptions: larger effluent storage tank (716m³) and sludge storage tank with carbon filter (55m³)

Outline of change: The Condition 1.2, Site Plan has been replaced by a new 'Site Plan'

Details including justification: The new Site Plan reflects the change in location of the ETP and the associated whilst maintaining continuity with Table 3.1 Emission to Air ELVs which occurs later in the permit.

Outline of change: The Condition 1.3, Location Plan has been replaced by a new 'Location Plan'

Details including justification: The new Location Plan provides improved clarity on the site location and its surrounds.

Outline of change: Condition 2.4.5 has been revised to contain the standard wording which requires the operator to 'prepare, implement and maintain an "Incident Prevention and Mitigation Plan".' The requirement to review the plan every 4 years has been retained as condition 2.4.6.

Details including justification: The current permit condition 2.4.5 only refers to a review of the plan every 4 years but there is no other reference to a plan prior to this. The rewording of the condition makes it clear that the operator must have this plan in place and review it. The wording used is the standard wording used within other permits currently issued by SEPA. The requirement to review the plan every 4 years has been retained as condition 2.4.6.

Outline of change: Condition 2.4.6 has been added to the permit.

Details including justification: As detailed above, original permit condition 2.4.5 has been displaced by the addition of a new condition. Condition 2.4.6. refers to the requirement to review the "Incident Prevention and Mitigation Plan" every 4 years.

9 EMISSION LIMIT VALUES OR EQUIVALENT TECHNICAL PARAMETERS/ MEASURES

Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters? No

Justification: This variation covers the relocation of the ETP and associated infrastructure within the existing site boundary. No changes to ELV's are required and the current Trade Effluent Consent issued by Scottish Water will remain in place.

10 PEER REVIEW

Has the determination and draft permit been Peer Reviewed? Yes

Comments made: No comments Made

11 FINAL DETERMINATION

Issue of a Permit - Based on the information available at the time

Issue a Permit – Based on the information available at the time of the determination SEPA is satisfied that

- The applicant will be the person who will have control over the operation of the installation/mobile plant,
- The applicant will ensure that the installation/mobile plant is operated to comply with the conditions of the Permit,
- That the operator is able to use all appropriate preventative measures against pollution, in particular through the application of best available techniques.
- That no significant pollution should be caused.

12 REFERENCES AND GUIDANCE

Guidance Notes – Identify key references, guidance (BREF, UK Technical Guidance, etc) used in determination

The Pollution Prevention and Control (Scotland) Regulations 2012

BAT (Best Available Techniques) Reference Document (BREF)- Best Available Techniques in the Slaughterhouses and Animal By-products Industries 2005

SEPA Odour Guidance 2010

IED-IP-02 Interim Procedure for Determination of a PPC Part A Variation Application

IPPC H1 Horizontal Guidance Note, Environmental Assessment and the Appraisal of BAT

IED-PG-01-01 SEPA Application and Duly Made Guidance

IED-PG-01-04 SEPA Public Participation Consultation Guidance

IED-PG-01-08 SEPA Assessment Process Procedural Guidance