

**Pollution Prevention and Control Act 1999
 The Environmental Permitting (England and Wales) Regulations
 2016**

Permit to operate an animal carcass incinerator at a rate of 50 kilograms per hour but less than 1 tonne per hour and less than 10 tonnes per day

PERMIT HOLDER:	VETSPEED LIMITED
Permit Reference	EPR B316
Activity	Animal carcass incineration at a rate exceeding 50 kg per hour but less than 1 tonne per hour and less than 10 tonnes per day
The Environmental Permitting (England and Wales) Regulations 2016 Part 2 of Schedule 1 Reference	Section 5.1 Incineration and co-incineration of waste Part B (a)(vi)
Address of Installation	1 Rosehill Road, Rosehill Market Drayton, TF9 2JG
Registered Address of Company:	The Chocolate Factory, Keynsham, Bristol, BS31 2AU
Grid Reference	SJ 657 301 X (Easting) 365700 Y (Northing) 330100
Date of Application	21.04.2023
Permit Issued	23.06.2023
Variations	n/a
Total Number of Pages	13

Shropshire Council (the Regulator) in exercise of its powers under Regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) hereby permits **Vetspeed Ltd** to operate an installation for animal carcass incineration at a rate exceeding 50 kg per hour but less than 1 tonne per hour and less than 10 tonnes per day as detailed under Part 2 of Schedule 1, section 5.1 part B (a)(vi) to the extent permitted by and subject to the conditions of this Permit and operated within the site boundary on the attached Site Plan EPR B316 A1

Description of Activities

Material to be processed at the ROSEHILL establishment under the 'Part B Process' EPR Permit is to be whole carcasses comprising domestic pets and anatomical waste, equine, small-farmed animals unfit for human consumption and roadkill. PVC-free packaging that is used in the storage and transport of cadavers will additionally be co-burnt.

The routine day-to-day practice will be such that carcasses are cremated with 24-hours of receipt, and storage shall be limited to 3 days as a maximum. Refrigeration capacity is circa 80m³ with a floor dimension of 5.2m x 4.7m. Collection/delivery vehicles to be used are purpose-designed sealed units. They are not used for overnight etc. storage of cadavers.

The ROSEHILL installation will operate to a site-specific Working Plan that will accord with 'national' VETSPEED Ltd practice. Completion of this Working Plan will coincide with final operational decisions. A copy of this site-specific Working Plan will be submitted to the Regulator within 2-months of issue of the EPR Permit.

The cremators are to be designed, manufactured, installed and commissioned by Matthews Environmental Solutions Limited of Hyde, Cheshire, UK.

To ensure effective destruction of the combustion products, the unit incorporates a high-capacity thermal oxidising secondary chamber that is designed to retain the exhaust gases for at least 2 seconds at a temperature in excess of 850°C with turbulent air flow and in an oxygen rich environment.

The two cremators are:

CREMATOR 1: DEFRA approved SUREFIRE SA50/3 kerosene fired manual load equine cremator facilitating an independent large dog cremator.

Equine and Large dog unit
Equine 150 kg hr⁻¹ throughput
Large Dog 50 kg hr⁻¹ throughput
Total capacity 200 kg hr⁻¹ throughput

Both units are to be serviced by a common stack exhausting 2.175m³ s⁻¹ of waste combustion gas @ 925°C.

The unit is designed to handle animal remains generally comprising of the following or a combination of the following:

- bulk load pets;
- horses;
- individual pet carcasses.

The waste is reduced by 90-95% w/w to leave an inert ash.

CREMATOR 2: DEFRA approved SUREFIRE SA50/1 kerosene fired manual load multi-chambered unit, comprising of four chambers for medium size animals and two small pet chambers:

4 chambers 25 kg hr⁻¹ throughput each
 2 chambers 5 kg hr⁻¹ throughput each
 Total capacity 110 kg hr⁻¹ throughput

These units are to be serviced by a common stack exhausting 1.196 m³ sec⁻¹ of waste combustion gas @ 925°C. The unit is designed to handle whole individual animal pet carcasses. The waste is reduced by 90-95% w/w to leave an inert ash.

CONTROL SYSTEM

The total installation will be policed by a time and temperature dedicated PLC control system, housed within an incinerator mounted control cabinet. The control panel will incorporate visual display of both the primary and secondary temperatures and will provide status indication of the plant cycles.

Within the control system design the incinerator shall be monitored for all aspects of control and self-correction of any out of limit parameter will take place. Automatic correction of plant conditions is constantly achieved by a variety of controllable functions; these include but are not limited to:

- Prevention of further loading
- Reduction of fuel input

The control system has the following functions: -

- i. Pre-heat cycle
- ii. Burn cycle
- iii. Cool down cycle
- iv. Primary burner temperature control
- v. Secondary burner temperature control

FUEL STORAGE

There are to be two 2,500 Litre capacity, double-skinned plastic kerosene storage tanks located at the side of the Cremation Building, which were installed in 2019.

PERMIT CONDITIONS

This permit is issued subject to compliance with the following conditions listed below. Unless otherwise stated, these conditions shall come into effect immediately: -

EMISSION LIMITS AND CONTROLS

1. Emissions shall in normal operation be free from visible smoke. During start up and shut down the emissions shall not exceed the equivalent of Ringlemann Shade 1 as described in British Standard BS 2742:2009.
2. The number of start-ups and shut-downs should be kept to the minimum that is reasonably practicable.
3. All other releases to air, other than condensed water vapour, shall be free from persistent visible emissions.
4. The introduction of dilution air to achieve emission concentration limits is not permitted.
5. Emissions of the substances listed in **Table 1** shall be controlled and comply with the limits specified. The Methods and frequency of monitoring shall be complied with. Sampling shall be representative and the reference conditions for the limits are 273.1 K, 101.3 KPa, and 11% Oxygen.

TABLE 1
Emission limits, monitoring and other provisions

Pollutant	Emission limits	Monitoring	Monitoring Frequency
Total Particulate Matter	100mg/m ³	Manual Extractive Testing	Annual
Hydrogen Chloride (excluding particulate matter)	100mg/m ³	Manual Extractive Testing	Annual
Carbon Monoxide	100mg/m ³ as an hourly average 150mg/m ³ for 95% of all measurements, determined as 10 minute averages, in any 24-hour period	Manual Extractive Testing	Annual
Organic Compounds (Excluding particulate matter)	10mg/m ³ as total carbon	Manual Extractive Testing	Annual
Oxygen	Minimum 3% and average 6% by volume	Manual Extractive Testing	Annual
Secondary Chamber Temperature	Minimum 850°C at start and at or after the end of retention zone in secondary chamber	Measure at start and at or after the end of retention zone in secondary chamber	Continuously
Secondary Chamber retention time	Minimum 2 seconds after the last injection of combustion air	Demonstrate or calculate	On commissioning

6. Incinerators shall operate at 850°C for the combustion of animal carcasses.
7. The residence time in the secondary combustion chamber of the 2 cremators shall be a minimum of 2 seconds.

EMISSION MONITORING AND RECORDS

8. There shall be no offensive odour arising from the activity detectable beyond the installation boundary as shown in red on plan reference **EPR B316 A1**
9. A visual and olfactory assessment of emissions shall be made at least once per day whilst one or both cremators are running to determine compliance with conditions 1, 3 and 9. The results of these assessments and the location at which they were carried out shall be recorded in the logbook or recording system kept in accordance with condition 23.
10. Any temperature monitors shall be calibrated in accordance with the manufacturer's instructions. A copy of the instructions shall be available for inspection on request.
11. The results of non-continuous emission testing should be forwarded to the regulator within 8 weeks of completion of the sampling.
12. Adverse results from any monitoring activity (both continuous and non-continuous) should be investigated by the operator as soon as the monitoring data has been obtained. The operator should:
 - identify the cause and take corrective action;
 - clearly record as much detail as possible regarding the cause and extent of the problem, and the remedial action taken;
 - re-test to demonstrate compliance as soon as possible; and inform the regulator of the steps taken and the re-test results.

PROCESS CONTROLS

13. Animal carcasses should be processed as soon as possible, and storage shall be limited to 3 days as a maximum.
14. Processing records shall be maintained which will track carcass arrival and disposal times and dates.
15. All spillages shall be cleared as soon as possible by vacuum cleaning, wet methods, or other techniques that minimise dust.
16. Ash and non-combustible residues shall be removed from the cremator in such a way as to prevent dust emissions via the flue.
17. Cremated remains shall be moved and stored in lidded containers; cremated remains shall not be stored in open bags or containers.

MAINTENANCE

18. The operator shall have available for inspection a record of the maintenance that has been undertaken.
19. Flues and ductwork shall be inspected at least once every 12 months and cleaned regularly to prevent accumulation of materials.

MANAGEMENT AND TRAINING

20. Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit.
21. The operator shall notify the Council of any changes to the persons nominated in the application as the primary point of contact, and deputy.
22. A copy of this permit shall be kept at the permitted installation. All staff who should be aware of its content shall be told where it is kept.
23. All records made in compliance with this permit shall be kept in a written or computer logbook or by using some other systematic method and shall be clear and legible. If any entry is amended, a clear statement of the reason for doing so shall be included. Unless otherwise in this permit, all records required to be taken shall be kept available for inspection for at least 18 months from the date of its being made. A copy of the manufacturers' instructions referred to in this permit shall be available for inspection on request.

BEST AVAILABLE TECHNIQUES

24. The best available techniques shall be used to prevent or, where that is not 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.
25. 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.

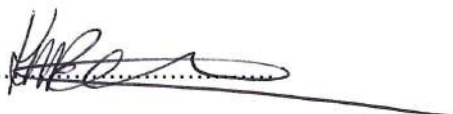
Any reference in this permit to "regulator" shall mean Shropshire Council.
Information required by this permit shall be sent to Shropshire Council via the following:

Environmental Protection
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

0345 678 9000

Environmental.protection@shropshire.gov.uk

Signed.....



Date 23.06.2023

Kirsty Bell
Environmental Protection Team

Duly authorised by Shropshire Council

APPENDIX 1.

Site Plan EPR B316 A1 Location of the Installation (boundary marked in red)



EXPLANATORY NOTES

These notes do not form part of the Permit

Health and Safety at Work and Other Statutory Requirements

This permit is issued under the Pollution Prevention and Control Act 1999 and associated regulations. It must not be taken to replace any responsibilities you may have under workplace health and safety legislation.

This permit only regulates air pollution matters and does not absolve you of the responsibility of any other statutory requirement, such as any need to obtain planning permission, hazardous substances consent or Building Regulations approval from the Council. Discharge consents from the local sewerage undertaker or a waste disposal licence from the Environment Agency may still be required.

The Permit includes conditions that have to be complied with. It should be noted that the operator must use the best available techniques (BAT) for preventing or, where that is not practicable, reducing emissions from all aspects of the installation in accordance with condition [insert] of this permit.

The BAT condition is regarded as covering, among other matters, the provision of sufficient training and practical instruction for service station operation staff; in order for them to carry out their duties in respect of using (or supervising the use of) and maintaining vapour collection controls, and the actions to be taken in the event of a vapour leak. Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

Talking to us

To speak to someone concerned with this permit telephone 0345 678 9000 and ask to speak with an officer from the Environmental Protection Team or e-mail specialist@shropshire.gov.uk.

Confidentiality

The Permit requires the Operator to provide information to the Council. The Council will place the information onto the public register in accordance with the requirements of the EP Regulations. If the Operator considers that any information provided is commercially confidential, it may apply to the Council to have such information withheld from the register as provided in the EP Regulations. To enable the Council to determine whether the information is commercially confidential, the Operator should clearly identify the information in question and should specify clear and precise reasons.

Powers of Entry

Any duly authorised officer of the Regulating Authority may enter premises to inspect an activity at any reasonable time.

On entry of the premises the officer also has powers to take any equipment or materials with him for which the power of entry is being exercised, to make such examination and investigation as may be necessary, to take such photographs, measurements or samples and seek any other assistance necessary to assist him in his duties.

Variations of the Permit

This Permit may be varied in the future. Should a variation become necessary, then a variation notice will be served upon the operator under EP Regulation 20(1), which specifies the variation and the date or dates on which the variation is to take place. In addition to this, the operator may apply to the Regulator for variations in the Permit should the necessity arise. The Status Log within the Introductory Note to any such variation will include summary details of this Permit, variations issued up to that point in time and state whether a consolidated version of the Permit has been issued.

Surrender of the Permit

Before this Permit can be wholly or partially surrendered, an application to surrender the Permit has to be made in accordance with Regulation 24 of the EP Regulations.

Transfer of the Permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit has to be made by both the existing and proposed holders, in accordance with Regulation 21 of the EP Regulations. A transfer will be allowed unless the Council considers that the proposed holder will not be the person who will have control over the operation of the installation or will not ensure compliance with the conditions of the transferred Permit.

Changes to the Permit

Any change in the activities covered by this permit must be notified to the Council for approval prior to implementation.

Offences

Regulation 38 of the EP Regulations defines the offences that may arise as a result of non-compliance with the regulations or this permit. You are advised to be familiar with this regulation since a person guilty of an offence could be fined and/or be subject to imprisonment.

Enforcement

You will be liable to enforcement action where;

- (a) a change is made (without approval of the regulator) to the activities as outlined in the 'description of activities' at the start of this permit,
- (b) any of the activities are carried on outside the boundary of the installation,
- (c) a new activity (as defined within the Environmental Permitting (England and Wales) Regulations 2016) is carried on without a proper permit, and
- (d) any of the conditions of the permit are breached
- (e) intentional false entries are made in relation to the operation and permit
- (f) a false or misleading statement is made in relation to the operation and permit.

Revocation

The Permit may be revoked at any time by the enforcing Local Authority. This will particularly be considered if fees are not paid or enforcement notices are not complied with.

Suspension

The Regulator has a duty to serve a suspension notice if it is considered that there is an imminent risk of serious pollution to the environment, whether or not there has been a breach of the Permit.

Annual Subsistence Charge

An annual subsistence charge for this permit commencing on 1st April each year is payable against an invoice issued by the Local Authority.

Right to Appeal against Permit Conditions

You have the right of appeal against this permit within 6 months of the date of the decision (normally the date on the bottom of the permit). An appeal is made to the Secretary of State for the Environment. Appeals relating to operations in England shall be sent 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. Further guidance can be found in the PPC General Guidance Manual at

<http://www.defra.gov.uk/environment/ppc/localauth/pubs/guidance/manuals.htm>.

The appeal must be in the form of a written notice or letter stating that the person wishes to appeal and listing the condition(s) which is/are being appealed against. The following five items must be included:

- (a) a statement of the grounds of appeal;
- (b) a copy of any relevant application;
- (c) a copy of any relevant permit;
- (d) a copy of any relevant correspondence between the person making the appeal ("the appellant") and the Council;
- (e) a statement indicating whether the appellant wishes the appeal to be dealt with:-
 - (i) by a hearing attended by both parties and conducted by the Planning Inspectorate or
 - (ii) by both parties sending the Planning Inspectorate written statements of their case (and having the opportunity to comment on one another's statements).

At the same time, the notice of appeal and documents (a) and (e) must be sent to the Council, and the person making the appeal shall inform the Secretary of State that this has been done.

You will normally be expected to pay your own expenses during an appeal.

Please note:

An appeal will not suspend the effect of the conditions appealed against; the conditions must still be complied with. In determining an appeal against one or more conditions, the Act allows the Secretary of State in addition to quash any of the other conditions not subject to the appeal and to direct the Local Authority either to vary any of these other conditions or to add new conditions.

You will be liable for prosecution if you fail to comply with the conditions of this permit. If found guilty, the maximum penalty for each offence if prosecuted in a Magistrates Court is unlimited fine and/or 6 months imprisonment. In a Crown Court it is an unlimited fine and/or 5 years imprisonment.

Our enforcement of your permit will be in accordance with the Regulators' Compliance Code.

Appendix 2 Definitions

- (i) The term "Regulator" in this Permit shall be taken to mean Shropshire Council, Environmental Protection Team, Public Health Department, situated at The Shirehall. Tel. No. 0345 678 9000.
- (ii) The term "operator" in this Permit shall be taken to mean the person having legal responsibility for the process.
- (iii) The term "installation" in this Permit shall be taken to mean:
 - (a) A stationary technical unit where one or more activities (defined in (iv) below) are carried out; and
 - (b) Any other location on the same site where any other directly associated activities are carried out which have a technical connection with the activities carried out in the stationary technical unit and which could have an effect on pollution.
- (iv) The term "activity" in this Permit shall be taken to mean the whole process including the treating, handling and storage of any materials used in and products and wastes produced by the installation.
- (v) The term "change in operation" in this permit shall be taken to mean a change in the nature or functioning, or an extension of the installation, which may have consequences for the environment.
- (ix) "Best Available Techniques (BAT)" in this permit shall be taken to mean the most effective and advanced stage in the development of activities and methods of operation which indicates the practical suitability of particular techniques designed to prevent and, where that is not practicable, generally to reduce emissions and the impact on the environment as a whole.

