

# EASTSUFFOLK

C O U N C I L

Operator	Breedon Trading Limited
Installation Address	Flixton Gravel Pit Homersfield Road Flixton West Bungay Suffolk NR35 1NN
Permit Reference	20/00006/B/V2
Grid Reference	629671, 286312
Registered Address	Pinnacle House Breedon Quarry Breedon On The Hill Derby England DE73 8AP
Company Number	00156531

Breedon Trading Limited (“The Operator”) is hereby permitted by East Suffolk Council (“The Regulator”) to operate a cement batching process as defined under Schedule 1, Part 2, Chapter 3 of The Environmental Permitting (England and Wales) Regulations 2016 (“The Regulations”), to the extent authorised by and subject to the conditions of this Permit and to operate within the installation boundary as detailed in Appendix A.

Signed

Dated 4<sup>th</sup> January 2024

**Fiona Quinn**  
**Head of Environmental Services and Port Health**  
Authorised to sign on behalf of East Suffolk Council

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## **Introductory Notes**

*[This introductory note does not form a part of the Permit]*

This Permit is issued under Regulation 13 of The Environmental Permitting (England and Wales) Regulations 2016 (EPR), to operate an installation carrying out activities covered by the description in Schedule 1, Part 2, Chapter 3, Section 3.1 Part B(b) of the Regulations, to the extent authorised by the Permit, namely, the blending, packing, loading, unloading and use of bulk cement.

Aspects of the operation of the installation which are not regulated by conditions of the Permit are subject to the Operator using the best available techniques for preventing or, where that is not practicable, reducing emissions from the installation.

Techniques include both the technology used and the way in which the installation is designed, built, maintained, operated and decommissioned.

The Permit conditions require the Operator to use Best Available Techniques (BAT), in each of the aspects of the management of the installation, to prevent and where that is not practicable to reduce emissions. The Conditions do not provide a definitive explanation of 'BAT'; In determining 'BAT', the Operator should pay particular attention to relevant sections of the Process Guidance Note , and other relevant guidance.

A full description of the installation is given in the Application and the main features of the installation are as follows:

## **Process Description**

Concrete is manufactured by mixing, in carefully controlled proportions, Portland cement or a mixture of cementitious materials in powder form, together with coarse and fine aggregates (gravel, crushed stone or sand), and water. The proportions chosen are determined by the performance or composition necessary to meet the specification or performance requirements. Small amounts of admixtures may be included to modify the properties of the mix. Cement and Ground Granulate Blast Furnace Slag (GGBS) is delivered to site by bulk road tankers.

The tanker pneumatically blows the material into the designated silo. The delivery pressure for discharging the cement from the tanker to the silo is controlled by an automatic pressure regulator fitted to the tanker. This prevents the silo being overfilled and over pressurised. A regulating valve can also be fitted to the silo discharge pipe. A reverse jet filter is fitted to the top of each silo which pulses air through the filter whilst the delivery is taking place.

Sand and aggregates are taken from the quarry site where the batching plant is located. As and when aggregates are needed a loading shovel will tip the aggregates into a ground hopper, which transports the materials by conveyor belt into a storage hopper. A batch of cement is weighed and discharged into the back of the truck mixer via a chute a flexible sock. The truck mixer is positioned underneath the discharge gantry whilst this operation takes place.

The Status Log provides information relating to Permitting process and future variations and reviews of the permit.

<b>Provenance</b>	<b>Date</b>	<b>Permit Reference</b>
Application for Permit	06.09.2007	PPC/07/5
Permit Transferred	06.06.2018	07/00005/B

Permit Varied	09.09.2020	202/00006/B
Permit Transferred	23.08.2021	20/00006/B/V1
Permit Varied	04.01.2024	20/00006/B/V2

**End of Introduction**

## **Permit Conditions**

The conditions contained within this Permit are based upon the Process Guidance Note 3/01(12) Statutory guidance for blending, packing, loading, unloading and use of cement.

### **1.0 Emissions and monitoring**

- 1.1 No visible particulate matter shall be emitted beyond the installation boundary.
- 1.2 The emission requirements and methods and frequency of monitoring set out in Table 1 shall be complied with.

Any monitoring display required for compliance with the permit shall be visible to operating staff at all times. Corrective action shall be taken immediately if any periodic monitoring result exceeds a limit in Table 1, or if there is a malfunction or breakdown of any equipment which might increase emissions. Monitoring shall be undertaken or repeated as soon as possible thereafter and a brief record shall be kept of the main actions taken.

*Where continuous monitors are fitted to show compliance with a numerical limit in Table 1:* All continuous monitors fitted to show compliance with the permit shall be fitted with an alarm warning of arrestment failure or malfunction. They shall activate when emissions reach [75%] of the relevant emission limit in Table 1 and record automatically each activation. Alarms shall be tested at least once a week.

- 1.3 All plant and equipment capable of causing, or preventing emissions and all monitoring devices shall be calibrated and maintained in accordance with the manufacturers instructions. Records shall be kept of such maintenance.

### **2.0 Silos**

- 2.1 Bulk cement, [Calcium Sulphate/Sulphate Binder, Ground Granulated Blast Furnace Slag and Fly Ash] shall only be stored within the appropriate silos.
- 2.2 Dust emissions from loading or unloading road tankers shall be minimised venting to specify type arrestment plant or backventing to a delivery tanker fitted with an on-board, truckmounted relief valve and filtration system and by connecting transfer lines first to the delivery inlet point and then to the tanker discharge point, and by ensuring delivery is at a rate which does not pressurise the silo.
- 2.3. Silos and bulk containers of dusty materials shall not be overfilled and there shall be an overfilling alarm. Alarms shall be tested at least once a week or before a delivery takes place (whichever is the longer interval).
- 2.4. When loading silos (which were new after Jun 2004), deliveries must automatically stop where overfilling or over-pressurisation is identified.
- 2.5. Displaced air from pneumatic transfer shall pass through abatement plant namely a reverse air jet cartridge filter prior to emission to air.

### **3.0 Aggregates delivery and storage**

3.1 Sand and aggregates shall only be stored in approved bays at ground level or screened storage hoppers at high level as detailed on the attached plan and shall be subject to suppression and management techniques to minimise dust emissions.

### **4.0 Belt conveying**

4.1 All dusty materials, including wastes, shall be conveyed using belt conveyor with enclosures. All transfer points shall be fitted with enclosures.

### **5.0 Loading, unloading and transport**

5.1 No potentially dusty materials (including wastes) or finished products shall arrive on site or leave the site other than by use of approved dust control technique and subject to approved abatement plant.

### **6.0 Roadways and transportation**

6.1 All areas where there is regular movement of vehicles shall have a consolidated surface capable of being cleaned, and these surfaces shall be kept clean and in good repair. Quarry haul roads are excluded from this provision.

6.2 Vehicles shall not track material from the site onto the highway.

### **7.0 Techniques to control fugitive emissions**

7.1 The fabric of process buildings shall be maintained so as to minimise visible dust emissions.

### **8.0 Records and training**

8.1 Written or computer records of all tests and monitoring shall be kept by the operator for at least 24 months. A copy of all manufacturers' instructions referred to in this permit shall be made available for examination by the Council.

8.2 Staff at all levels shall receive the necessary training and instruction to enable them to comply with the conditions of this permit. Records shall be kept of relevant training undertaken.

### **9.0 Best Available Techniques**

9.1 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.

9.2 If the operator proposes to make a change in operation of the installation, he 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".

**Table 1 - Emission limits, monitoring and related provisions**

Row	Substance	Source	Emission limits/provisions	Type of monitoring	Monitoring frequency
1	Particulate matter	Whole Process	No visible airborne emission to cross the site boundary where harm or nuisance may be caused	Operator observations	At least daily
		Silo inlets and outlets ( <i>for silos new since 1st July 2004</i> )	Designed to emit less than 10mg/m <sup>3</sup>	Operator observations	At time of delivery
		Silo inlets and outlets	No visible emission		
		Arrestment equipment, or any point where dust contaminated air is extracted from the process to atmosphere, with exhaust flow >300m <sup>3</sup> /min. (other than silo arrestment plant)	50mg/m <sup>3</sup>	Recorded indicative monitoring	Continuous
				*Isokinetic sampling	At least once to demonstrate compliance, then as necessary to provide a reference for the continuous indicative monitor.
		Arrestment equipment, or any point where dust contaminated air is extracted from the process to atmosphere, with exhaust flow >100m <sup>3</sup> /min. (other than silo arrestment plant)	No visible emission Arrestment equipment should be provided with a design guarantee that the equipment can meet 50mg/m <sup>3</sup>	Indicative monitoring to demonstrate that the arrestment equipment is functioning correctly	Continuous
Arrestment equipment, or any point where dust contaminated air is extracted from the process to atmosphere, with exhaust flow <100m <sup>3</sup> /min. (other than silo arrestment plant)	No visible emission	Operator observation Or Indicative monitoring	At least daily Or Continuous		
2	Droplets, persistent mist and fume	All emissions to air (except steam and condensed water vapour)	No droplets, no persistent mist, no persistent fume.	Visual observations	*On start-up and on at least two more occasions during the working day*

Only emissions to atmosphere are required to comply with the emission limits within this table.

Notes:

\*All periodic monitoring results shall be checked by the operator on receipt and sent to the Council within 8 weeks of the monitoring being undertaken.\*

a) The reference conditions for limits in Table 1 are: 273.1K, 101.3kPa, without correction for water vapour content, unless stated otherwise.

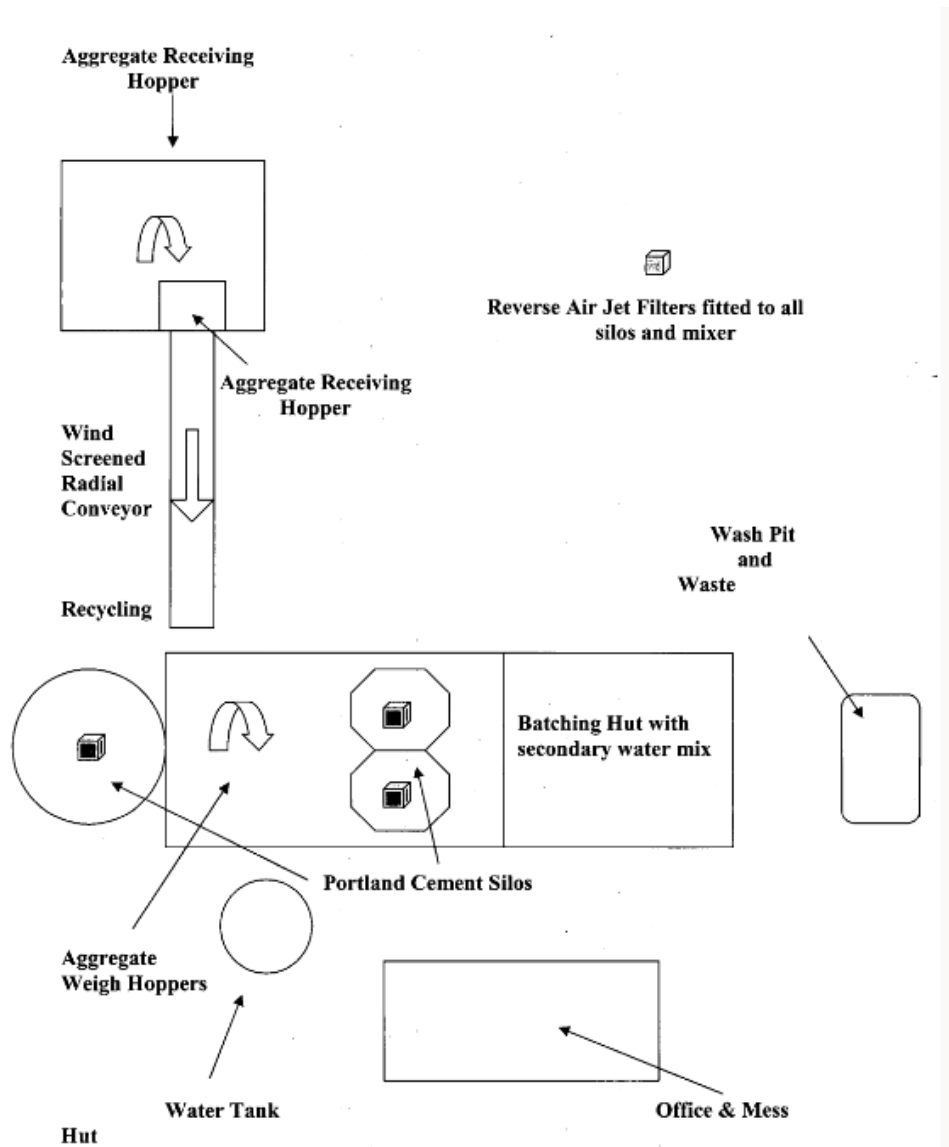
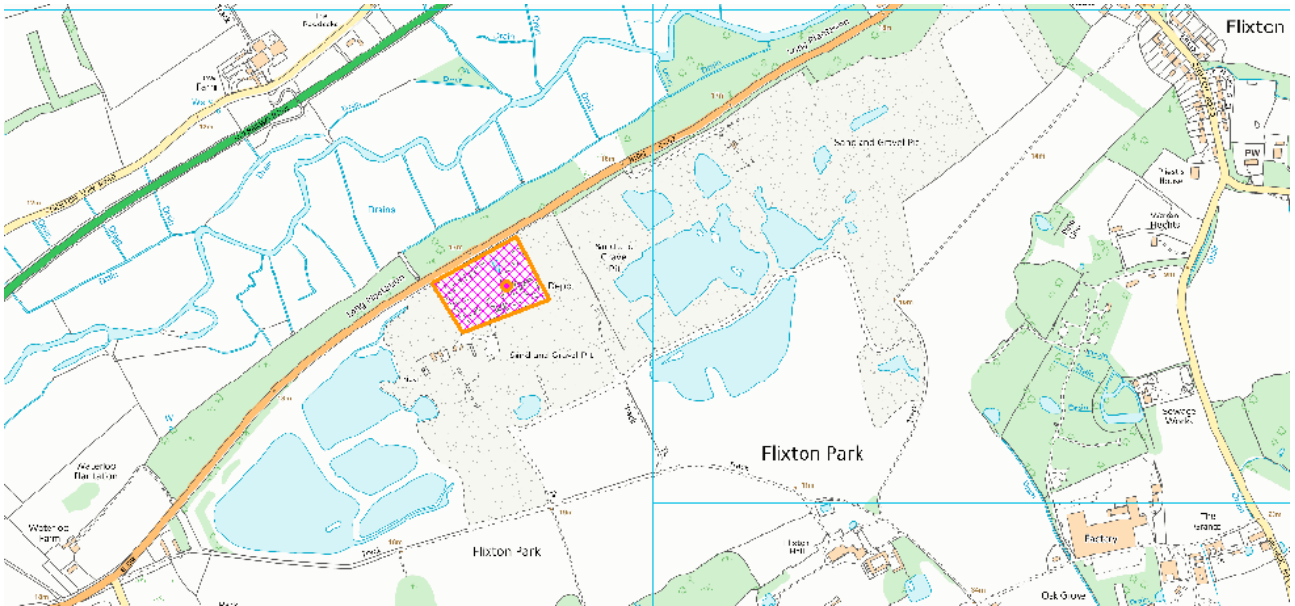
b) All periodic monitoring shall be representative, and shall use standard methods.

c) The emission limits do not apply during start-up and shut down. All emissions shall be kept to a minimum during these periods.



# Appendix A – Location and Layout plans

## Site Location and Layout



## **Explanatory Notes *These notes do not comprise part of the permit.***

### **Glossary of Abbreviations and Acronyms**

**“Abatement plant”** means the equipment dedicated to the removal of polluting substances from releases from the regulated facility to air

**“Application”** means the application for an Environmental Permit

**“BAT”** means Best Available Techniques

**“CEMS”** means continuous emissions monitoring system.

**“ELV”** means Emission Limit Value

**“EPR”** means Environmental Permitting (England and Wales) Regulations 2016

**“EA”** means the Environment Agency

**“LA”** means Local Authority

**“Monitoring”** includes the taking and analysis of samples, instrumental measurements (periodic and continual), calibrations, examinations, tests and surveys

**“Site”, “on site”** and similar terms shall be taken to refer to the site of the SWIP including all waste reception and storage areas.

**“The Council”** means the East Suffolk Council

**“The Regulations”** means the Environmental Permitting (England and Wales) Regulations 2016 (as amended).

**“The Regulator”** means authorised officer of East Suffolk Council.

### **Talking to us**

The Local Authority can be contacted by telephone on 0333 016 2000, e-mail [ep@eastsoffolk.gov.uk](mailto:ep@eastsoffolk.gov.uk) or by writing to Environmental Protection at, East Suffolk House, Station Road Melton Woodbridge Suffolk; IP12 1RT

**If you are reporting a malfunction or failure of permitted activity outside normal working office hours, you should phone 01502 527132. This line directs you to a call centre at East Suffolk Council and is exclusively for reporting genuine emergencies.**

### **Public Registers**

The application, the permit and documents concerned with the determination of the application and subsequent reports and correspondence are held on the public register at [Environmental permits issued by East Suffolk Council » East Suffolk Council](#). The register is held in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016. Certain information may be withheld from public registers where it is commercially confidential or contrary to national security.

### **Confidentiality**

The Permit requires the Operator to provide information to The Regulator. The Regulator will place the information onto the public registers in accordance with the requirements of the Environmental Permitting (England and Wales) Regulations 2016, unless the Operator requests to have such information withheld from the register as provided in Environmental Permitting (England and Wales) Regulations 2016. To enable The Regulator will determine whether the information is commercially confidential, the Operator should provide clear justification for each item requested 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.

Information may also 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.

## Variations to the permit

This Permit may be varied in the future if at any time the activity or any aspect of the activity regulated by the changes to conditions, such that the conditions no longer reflect the activity and require alteration. You must submit a formal Application to The Regulator. The 'Status Log' within the introduction note will include summary details of each permit variation issued.

## Surrender of the permit

Where an Operator intends to cease the operation of an installation (in whole or in part) East Suffolk Council should be informed in writing. Such notification must include the information specified in Regulation 24 or 25 of the Environmental Permitting (England and Wales) Regulations 2016.

## Transfer of the permit or part of the permit

Before the Permit can be wholly or partially transferred to another person, a joint application to transfer the Permit must be made by both the existing and proposed holders, in accordance with Regulation 21 of Environmental Permitting (England and Wales) Regulations 2016. A transfer will be allowed unless The Regulator 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.

## Enforcement and Offences

If The Regulator is of the opinion that you have contravened or are likely to contravene a condition of this Permit, it may serve an Enforcement Notice in accordance with Regulation 36 of the Environmental Permitting (England and Wales) Regulations 2016. If The Regulator is of the opinion that the continued operation of the installation involves a risk of serious pollution it will serve a Suspension Notice under Regulation 37 of the Environmental Permitting (England and Wales) Regulations 2016.

Offences detailed in Regulation 38 of the Environmental Permitting (England and Wales) Regulations 2016 include failing to comply with or contravening a condition in this Permit, failing to comply with an enforcement notice or suspension notice, intentionally making a false entry in any records kept under a condition of this Permit. A person found guilty of an offense, upon summary conviction could be liable (i) to the maximum penalty of a £50,000 fine and/or twelve months imprisonment, or (ii) upon conviction to an unlimited fine and/or five years imprisonment.

## Responsibility under the workplace health & safety legislation

This Permit is given in relation to the requirements of Environmental Permitting (England and Wales) Regulations 2016. It must not be taken to replace any responsibilities you may have under Workplace Health and Safety legislation.

### Subsistence Charge

An application fee has been paid for this permit. An annual subsistence charge, which is subject to variation by Central Government and the installation compliance risk rating, is payable to this Council to ensure this Permit remains in force. An invoice will be sent for the appropriate subsistence charge each year. If you fail to pay the fee due promptly, the Council may revoke the Permit.

### General Statutory Requirements

This permit does not detract in any way from other statutory requirements applicable to you or the installation such as any need to obtain planning permission or building regulation approval or responsibilities you have under other legislation for health, safety and welfare in the workplace. If there are any situations where different standards are required under these two types of legislation, the more stringent standard will apply.

### Review of Conditions

The “Conditions” contained in this Permit will be reviewed by the local authority at intervals, in accordance with Regulation 34 of “The Environmental Permitting (England and Wales) Regulations 2016”. Where a justifiable complaint is attributable to the operation of this process or where new knowledge develops on any harmful effects from any emissions from this type of installation, an immediate review of the process will be undertaken, and the local authority will specify any new requirements together with an appropriate timescale.

Where a condition of the permit requires a systematic assessment or review, the assessment shall be undertaken in a methodical and arranged manner. Guidance may be obtained from The Regulator.

### Management arrangements

All references to “reasonable times” in this Permit include; all times when the process is operational or when there are employees present at the site or when the site is open for business.

An EMS is recommended as a key method for controlling emissions and thereby achieving compliance with permit conditions. This can be a simple in-house structured system that ensures Environmental Permitting considerations are addressed in the day to day running of the process. Such a system should be reviewed annually to ensure a continuous level of environmental improvement. Alternatively, the Environmental Management System may comply with a national standard such as ISO 14001 Certification.

### **End of Explanatory Notes**