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**PROCESSING OF ANIMAL BY-PRODUCTS TO PRODUCE
TALLOW AND MEAT AND BONE MEAL BY HEATING AND
CENTRIFUGAL EXTRACTION**

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HAZARDOUS SUBSTANCES

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OUR REF: 15/2949/ippc

1. Directive 2014/80/EU amends Annex II to Directive 2006/118/EC (the Groundwater Daughter Directive) on the protection of groundwater against pollution and deterioration; the EU legislation and UK (England and Wales) transposition via the Environmental Permitting Regulations, The Groundwater (Water Framework Directive) Regulations and Direction (WFD), and other related legislation supplants the Groundwater Regulations 1999. The Groundwater Regulations sought to protect groundwater by preventing the release of prescribed substances. The WFD seeks a broader control to prevent deterioration of groundwater not just by restricting the release of potentially polluting substances but also by other measures including the progressive enhancement of aquatic ecosystems and the promotion of sustainable water use.
2. “Hazardous substances” now displace the former “List 1 substances” referred to under the Groundwater Regulations 1999. Hazardous substances are defined in the Environmental Permitting (England and Wales) Regulations 2016, Schedule 22; non-hazardous pollutants are defined as any other pollutant which is no hazardous.
3. The Installation activity will not discharge any defined hazardous substances and there is minimal risk of hazardous or non-hazardous substances being accidentally discharged and which may then reach groundwater.
 - a. The raw material of the Installation activity is animal tissue which is biodegradable, and not a material which can pollute water or groundwater such as to be “...toxic, persistent and liable to bio-accumulate, or that give rise to an equivalent level of concern” unless released directly and in large quantities. The Installation only accepts material directly into the processing line, does not store raw material and at any one time has a limited amount of material, in various stages of processing, within the Installation.

- b. The products of the Installation activity are MBM which is biodegradable, while tallow, the main product, is hydrophobic and must be heated to remain as a liquid or a material which can “flow”.
- c. The waste water produced is potentially a non-hazardous pollutant; measures are in place to contain, retain and dispose of this waste water off-site.
- d. All storage tanks are contained within a bund.
- e. The Installation has impermeable surfaces in accordance with the Animal By-Product Regulations.
- f. The Installation activity will be fully monitored including product and waste generation and storage, allowing for measurement and record checks which might reveal leakage if not observed.
- g. There is no river or stream close by which might form a direct environmental pathway. However, seepage into the aquifer below the karstic carboniferous limestone of the White Peak, which has matrix, fractured and channel conduits allowing for more direct percolation of water, requires prevention and appropriate control of potentially polluting substances and safeguards, as proposed at the Installation.