



Permit with introductory note

The Environmental Permitting (England & Wales) Regulations 2016

Unilever UK Limited
Port Sunlight Factory
Wood Street
Birkenhead
Wirral
CH62 4UY

Permit number

EPR/NP3024SJ

Permit number EPR/NP3024SJ

Introductory note

This introductory note does not form a part of the permit

This permit will allow the operator to operate:

- One or more medium combustion plant (MCP) between 1 and <50MWth but aggregated to <50MWth, and
- One Tranche B Specified Generator aggregated to <50MWth at a specified location

The details of the units and associated limits and monitoring requirements are specified in Tables S1.1 and S3.1.

This is a complex permit and air dispersion modelling was required.

The plant comprises two combined heat and power (CHP) units and two boilers. Both CHP units have rated thermal inputs of 9.7 MWth and each of the boilers have a thermal input of 5 MWth, giving an aggregate of 29.4 MWth. All plant operates at 8760 hours a year with the operation of the boilers and engines managed by separate third party contractors. The plant is fuelled by natural gas with the facility to use gas oil as emergency backup in the event of loss of natural gas supply. The maximum number of hours for this backup is 500 hours per year. The purpose of the plant is to provide power and steam or hot water for the factory.

Both boilers and generators were commissioned in 2011 so that all plant is classified as existing medium combustion plant (MCP) under Schedule 25A of the Environmental Permitting (England and Wales) (Amendment) Regulations 2018. The two CHP engines are also a specified generator under Schedule 25B of the same Regulations.

All emissions from the plant, including boilers and generators, are discharged through one combined stack, which is 35 metres high and located at National Grid coordinates SJ 34107, 83952.

The factory site lies within the settlement of Port Sunlight so that there are several residential receptors nearby. The nearest sensitive habitats are Dibbinsdale SSSI 1125 metres to the south, New Ferry SSSI 1300 metres east northeast and Mersey Estuary SSSI 1500 metres to the east.

The status log of the permit sets out the permitting history, including any changes to the permit reference number.

| Status log of the permit | | |
|-----------------------------------|-----------------------|---|
| Description | Date | Comments |
| Application EPR/NP3024SJ/A001 | Duly made 15/08/24 | Bespoke application for MCP(s) and/or Specified Generators. |
| Additional information received | 30/09/24 | Air quality assessment reviewed and resubmitted. |
| Permit determined EPR/NP3024SJ | 04/11/24 | Permit issued to Unilever UK Limited. |

End of introductory note

Permit

The Environmental Permitting (England and Wales) Regulations 2016

Permit number

EPR/NP3024SJ

The Environment Agency hereby authorises, under regulation 13 of the Environmental Permitting (England and Wales) Regulations 2016

Unilever UK Limited (“the operator”),

whose registered office is

**Lever House
3 St James Road
Kingston Upon Thames
KT1 2BA**

company registration number 00334527

to operate one or more Medium Combustion Plant and/or Specified Generators at

**Port Sunlight Factory
Wood Street
Birkenhead
Wirral
CH62 4UY**

to the extent authorised by and subject to the conditions of this permit.

| Name | Date |
|---------------------|-------------------|
| Beccy Brough | 04/11/2024 |

Authorised on behalf of the Environment Agency

Conditions

1 Management

1.1 General management

- 1.1.1 The operator shall manage and operate the activities:
- (a) in accordance with a written management system that identifies and minimises risks of pollution, so far as is reasonably practicable, including those arising from operations, maintenance, accidents, incidents, non-conformances, closure and those drawn to the attention of the operator as a result of complaints; and
 - (b) using sufficient competent persons and resources.
- 1.1.2 Records demonstrating compliance with condition 1.1.1 shall be maintained.
- 1.1.3 Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.

2 Operations

2.1 Permitted activities

- 2.1.1 The operator is only authorised to carry out the activities specified in schedule 1, table S1.1 (the “activities”).

2.2 The site

- 2.2.1 No MCP shall be operated beyond the site of the grid reference specified for it in schedule 1, table S1.1 of the permit.

2.3 Operating techniques

- 2.3.1 The activities shall be operated using the techniques and, in the manner, described in schedule 1, tables S1.2A and S1.2B.

3 Emissions and monitoring

3.1 Emissions to water, air or land

- 3.1.1 There shall be no point source emissions to air except from the sources and emission points listed in schedule 3, table S3.1.
- 3.1.2 The limits given in schedule 3 shall not be exceeded.

3.2 Monitoring

- 3.2.1 The operator shall, unless otherwise agreed in writing by the Environment Agency, undertake the monitoring specified in the following tables in schedule 3 to this permit, or at a greater frequency if notified to the operator in writing by the Environment Agency:
- (a) point source emissions specified in table S3.1.
- 3.2.2 Monitoring shall not take place during periods of start up or shut down.

- 3.2.3 For new MCPs the first monitoring measurements shall be carried out within 4 months of the issue date of the permit or the date when the MCP is first put into operation, whichever is later. For existing MCPs the first monitoring measurement shall be carried out at any time, but no later than the relevant compliance date.
- 3.2.4 The operator shall maintain records of all monitoring including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, test and surveys and any assessment or evaluation made on the basis of such data.
- 3.2.5 Monitoring equipment, techniques, personnel and organisations employed for the emissions monitoring programme specified in condition 3.2.1 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency.

4 Information

4.1 Records

- 4.1.1 All records required to be made by this permit shall:
- (a) be legible;
 - (b) be made as soon as reasonably practicable;
 - (c) if amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and
 - (d) be retained, unless otherwise agreed in writing by the Environment Agency, for at least 6 years from the date when the records were made.
- 4.1.2 The operator shall maintain convenient access, in either electronic or hard copy, to the records, plans and management system required to be maintained by this permit.
- 4.1.3 The operator shall maintain a record of the type and quantity of fuel used and the total annual hours of operation for each MCP and/or generator.
- 4.1.4 The operator shall maintain a record of any events of non-compliance and the measures taken to ensure compliance is restored in the shortest possible time.

4.2 Reporting

- 4.2.1 The operator shall send all reports and notifications required by the permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.
- 4.2.2 Within 28 days of the end of the reporting period the operator shall, unless otherwise agreed in writing by the Environment Agency, submit reports of the monitoring and assessment carried out in accordance with the conditions of this permit, as follows:
- (a) in respect of the parameters and emission points specified in schedule 4, table S4.1;
 - (b) for the reporting periods specified in schedule 4, table S4.1 and using the forms specified in schedule 4, table S4.2; and
 - (c) giving the information from such results as required by the forms specified in those tables.

4.3 Notifications

- 4.3.1 In the event:
- (a) of a breach of any of the permit conditions the operator must immediately—
 - (i) inform the Environment Agency, and

- (ii) take the measures necessary to ensure that compliance is restored within the shortest possible time;
 - (b) of a breach of any of the permit conditions which causes a significant degradation of local air quality, the operator must immediately suspend the operation of the activities or the relevant part of them until compliance with the conditions has been restored.
- 4.3.2 Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 to this permit within the time period specified in that schedule.
- 4.3.3 Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and/or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.
- 4.3.4 The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:
- Where the operator is a registered company:
- (a) any change in the operator's trading name, registered name or registered office address; and
 - (b) any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.
- Where the operator is a corporate body other than a registered company:
- (c) any change in the operator's name or address; and
 - (d) any steps taken with a view to the dissolution of the operator.
- In any other case:
- (e) the death of any of the named operators (where the operator consists of more than one named individual);
 - (f) any change in the operator's name(s) or address(es); and
 - (g) any steps taken with a view to the operator, or any one of them, going into bankruptcy, entering into a composition or arrangement with creditors, or, in the case of them being in a partnership, dissolving the partnership.

4.4 Interpretation

- 4.4.1 In this permit the expressions listed in schedule 6 shall have the meaning given in that schedule.
- 4.4.2 In this permit references to reports and notifications mean written reports and notifications, except where reference is made to notification being made "immediately," in which case it may be provided by telephone.

Schedule 1 – Operations

| Table S1.1 activities | | | | |
|---|---|---|-------------|--------------------------------|
| National Grid Reference and or activity reference/ emission point | Activity listed in the EP Regulations | Description of MCP and/or specified generator | Fuel | Operating hours limit per year |
| Boiler 1 NGR: SJ 34107 83952 | Schedule 25A – MCP as detailed in Schedule 7 | 1 x 5MWth boiler | Natural gas | Not restricted |
| | | | Gas oil | 500 |
| Boiler 2 NGR: SJ 34107 83952 | | 1 x 5MWth boiler | Natural gas | Not restricted |
| | | | Gas oil | 500 |
| CHP Engine 1 NGR: SJ 34107 83952 | Schedule 25A – MCP as detailed in Schedule 7 and Schedule 25B – Specified generator | 1 x 9.7 MWth engine | Natural gas | Not restricted |
| | | | Gas oil | 500 |
| CHP Engine 2 NGR: SJ 34107 83952 | | 1 x 9.7 MWth engine | Natural gas | Not restricted |
| | | | Gas oil | 500 |

| Table S1.2A Operating techniques for Medium Combustion Plant as detailed in Schedule 7 |
|--|
| <p>(a) Each MCP must be operated in accordance with the manufacturer’s instructions and records must be made and retained to demonstrate this.</p> <p>(b) The operator must keep periods of start-up and shut-down of each MCP as short as possible.</p> <p>(c) There must be no persistent emission of ‘dark smoke’ as defined in section 3(1) of the Clean Air Act 1993.</p> |

| Table S1.2B Operating techniques for Specified Generators |
|---|
| <p>(a) Each generator must be operated in accordance with the manufacturer’s instructions and records must be made and retained to demonstrate this.</p> <p>(b) The operator must keep periods of start-up and shut down of the generators as short as possible</p> <p>(c) There must be no persistent emission of ‘dark smoke’ as defined in section 3(1) of the Clean Air Act 1993.</p> <p>(d) The stack must be vertical and unimpeded by cowls or caps.</p> |

Schedule 2 – Waste types, raw materials and fuels

| Table S2.1 Raw materials and fuels | |
|--|--|
| Raw materials and fuel description | Specification |
| Gas oil or equivalent substitute to be agreed in writing with the Environment Agency | Not exceeding 0.1% w/w sulphur content |

Schedule 3 – Emissions and monitoring

| Table S3.1 Point source emissions to air – emission limits and monitoring requirements | | | | | | |
|--|--|---|--|------------------|--|---|
| Emission point ref. & location | Source/technology | Parameter | Limit (including unit) | Reference period | Monitoring frequency | Monitoring standard or method Note 1 |
| Boilers 1 and 2 | Existing medium combustion plant other than engines and gas turbines fuelled on natural gas. | Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂) | 250 mg/m ³ Limit applies from 01/01/2025 | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 14792 |
| | | Carbon monoxide | No limit set | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 15058 |
| Boilers 1 and 2 | Existing medium combustion plant other than engines and gas turbines fuelled on gas oil. | Oxides of Nitrogen (NO and NO ₂ Expressed as NO ₂) | No limit set | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 14792 |
| | | Carbon monoxide | No limit set | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 15058 |

Table S3.1 Point source emissions to air – emission limits and monitoring requirements

| Emission point ref. & location | Source/technology | Parameter | Limit (including unit) | Reference period | Monitoring frequency | Monitoring standard or method Note 1 |
|---|--|---|--|-------------------------|--|---|
| CHP Engines 1 and 2 | Existing medium combustion plant which are engines and gas turbines fuelled on natural gas and specified generator | Oxides of Nitrogen (NO and NO ₂ expressed as NO ₂) | 190 mg/m ³ Limit applies from 01/01/2025 | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 14792 |
| | | Carbon monoxide | No limit set | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 15058 |
| CHP Engines 1 and 2 | Existing medium combustion plant which are engines and gas turbines fuelled on gas oil and specified generator | Oxides of Nitrogen (NO and NO ₂ Expressed as NO ₂) | No limit set | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 14792 |
| | | Carbon monoxide | No limit set | Periodic | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | MCERTS BS EN 15058 |

Note 1:
Monitoring requirements are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases at a standardised O₂ content of 6% for solid fuels, 15% for engines and gas turbines and 3% all other MCPs

Schedule 4 – Reporting

Parameters, for which reports shall be made, in accordance with conditions of this permit, are listed below.

| Table S4.1 Reporting of monitoring data | | | |
|--|--|--|----------------------|
| Parameter | Emission or monitoring point/reference | Reporting period | Period begins |
| Emissions to air Parameters as required by condition 3.2.1. | Boilers 1 and 2 (when operating on natural gas) | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | 1 January |
| Emissions to air Parameters as required by condition 3.2.1. | Boilers 1 and 2 (when operating on gas oil) | After 1500 operating hours have elapsed and no less frequent than every 5 years | 1 January |
| Emissions to air Parameters as required by condition 3.2.1. | CHP engines 1 and 2 (when operating on natural gas) | Every 3 years from date of acceptance of first monitoring measurements under condition 3.2.3 | 1 January |
| Emissions to air Parameters as required by condition 3.2.1. | CHP engines 1 and 2 (when operating on gas oil) | After 1500 operating hours have elapsed and no less frequent than every 5 years | 1 January |

| Table S4.2 Reporting forms | | |
|-----------------------------------|--|-----------------------|
| Media/parameter | Reporting format | Date of form |
| Air | Emissions to Air Reporting Form or other form as agreed in writing by the Environment Agency | Version 1, 08/03/2021 |

Schedule 5 – Notification

These pages outline the information that the operator must provide.

Units of measurement used in information supplied under Part A and B requirements shall be appropriate to the circumstances of the emission. Where appropriate, a comparison should be made of actual emissions and authorised emission limits.

If any information is considered commercially confidential, it should be separated from non-confidential information, supplied on a separate sheet and accompanied by an application for commercial confidentiality under the provisions of the EP Regulations.

Part A

| | |
|--------------------------------|--|
| Permit Number | |
| Name of operator | |
| Location of Facility | |
| Time and date of the detection | |

| | |
|---|--|
| (a) Notification requirements for any malfunction, breakdown or failure of equipment or techniques, accident, or emission of a substance not controlled by an emission limit which has caused, is causing or may cause significant pollution | |
| To be notified within 24 hours of detection | |
| Date and time of the event | |
| Reference or description of the location of the event | |
| Description of where any release into the environment took place | |
| Substances(s) potentially released | |
| Best estimate of the quantity or rate of release of substances | |
| Measures taken, or intended to be taken, to stop any emission | |
| Description of the failure or accident. | |

| | |
|---|--|
| (b) Notification requirements for the breach of a limit | |
| To be notified within 24 hours of detection unless otherwise specified below | |
| Emission point reference/ source | |
| Parameter(s) | |
| Limit | |
| Measured value and uncertainty | |
| Date and time of monitoring | |

| | |
|---|--|
| (b) Notification requirements for the breach of a limit | |
| To be notified within 24 hours of detection unless otherwise specified below | |
| Measures taken, or intended to be taken, to stop the emission | |

| | |
|---|----------------------------|
| Time periods for notification following detection of a breach of a limit | |
| Parameter | Notification period |
| | |
| | |
| | |

| | |
|--|--|
| (c) Notification requirements for the breach of permit conditions not related to limits | |
| To be notified within 24 hours of detection | |
| Condition breached | |
| Date, time and duration of breach | |
| Details of the permit breach i.e. what happened including impacts observed. | |
| Measures taken, or intended to be taken, to restore permit compliance. | |

| | |
|--|--|
| (d) Notification requirements for the detection of any significant adverse environmental effect | |
| To be notified within 24 hours of detection | |
| Description of where the effect on the environment was detected | |
| Substances(s) detected | |
| Concentrations of substances detected | |
| Date of monitoring/sampling | |

Part B – to be submitted as soon as practicable

| | |
|--|--|
| Any more accurate information on the matters for notification under Part A. | |
| Measures taken, or intended to be taken, to prevent a recurrence of the incident | |

| | |
|--|--|
| Measures taken, or intended to be taken, to rectify, limit or prevent any pollution of the environment which has been or may be caused by the emission | |
| The dates of any unauthorised emissions from the facility in the preceding 24 months. | |

| | |
|-----------|--|
| Name* | |
| Post | |
| Signature | |
| Date | |

* authorised to sign on behalf of the operator

Schedule 6 – Interpretation

“accident” means an accident that may result in pollution.

“application” means the application for this permit, together with any additional information supplied by the operator as part of the application and any response to a notice served under Schedule 5 to the EP Regulations.

“authorised officer” means any person authorised by the Environment Agency under section 108(1) of The Environment Act 1995 to exercise, in accordance with the terms of any such authorisation, any power specified in section 108(4) of that Act.

“combined heat and power” (CHP) or Cogeneration mean the simultaneous generation in one process of thermal energy and electrical or mechanical energy.

“compliance date” means 01/01/2025 for existing MCPs and a tranche A specified generator with net rated thermal input of greater than 5MW or 01/01/2030 for existing MCPs and a tranche A specified generator with a net rated thermal input of less than or equal to 5MW.

“EP Regulations” means The Environmental Permitting (England and Wales) Regulations SI 2016 No.1154 and words and expressions used in this permit which are also used in the Regulations have the same meanings as in those Regulations.

“existing MCP” means an MCP first put into operation before 20/12/2018.

“first put into operation” means that the plant must have been fired with its design fuel up to its full load. This can be, but does not have to be, during commissioning.

“gas oil” includes diesel and is defined in Article 3(19) of the MCPD.

“MCERTS” means the Environment Agency’s Monitoring Certification Scheme.

“medium combustion plant” or “MCP” means a combustion plant with a rated thermal input equal to or greater than 1 MW but less than 50 MW.

“Medium Combustion Plant Directive” or “MCPD” means Directive 2015/2193/EU of the European Parliament and of the Council on the limitation of emissions of certain pollutants into the air from medium combustion plants, as read in accordance with Schedule 1A to the Environmental Permitting (England and Wales) Regulations 2016.

“new MCP” means an MCP first put into operation on or after 20/12/2018.

“operating hours” means the time, expressed in hours, during which a combustion plant is operating and discharging emissions into the air, excluding start-up and shut-down periods.

“quarter” means a calendar year quarter commencing on 1 January, 1 April, 1 July or 1 October.

“specified generator” has the meaning given in paragraph 2(1) of Schedule 25B of The EP Regulations.

“tranche A generator” has the meaning given in paragraph 3(3) of schedule 25B of The EP Regulations.

“tranche B generator” is any generator that is not a Tranche A generator.

“year” means calendar year ending 31 December.

Schedule 7 – Annex 1 of MCPD

| | Boiler 1 | Boiler 2 | CHP Engine 1 | CHP Engine 2 |
|--|---|------------------|------------------|------------------|
| 1. Rated thermal input (MW) of the medium combustion plant. | 5 | 5 | 9.7 | 9.7 |
| 2. Type of the medium combustion plant (diesel engine, gas turbine, dual fuel engine, other engine or other medium combustion plant). | Other medium combustion plant | | Other Engines | |
| 3. Type and share of fuels used according to the fuel categories laid down in Annex II. | All natural gas. Provision of a maximum of 500 hours per year of gas oil for the plant. | | | |
| 4. Date of the start of the operation of the medium combustion plant or, where the exact date of the start of the operation is unknown, proof of the fact that the operation started before 20 December 2018. | All plant 07/02/2011 | | | |
| 5. Sector of activity of the medium combustion plant or the facility in which it is applied (NACE code). | C.20.41 | C.20.41 | C.20.41 | C.20.41 |
| 6. Expected number of annual operating hours of the medium combustion plant and average load in use. | 8760 15% load | 8760 10% load | 8760 85% load | 8760 85% load |
| 7. Where the option of exemption under Article 6(3) or Article 6(8) is used, a declaration signed by the operator that the medium combustion plant will not be operated more than the number of hours referred to in those paragraphs. | N/A | N/A | N/A | N/A |
| 8. Name and registered office of the operator and, in the case of stationary medium combustion plants, the address where the plant is located. | <p>Unilever UK Limited</p> <p>Registered Office Lever House 3 St James Road Kingston Upon Thames KT1 2BA</p> <p>Site Address Port Sunlight Factory Wood Street Birkenhead Wirral CH62 4UY</p> | | | |

END OF PERMIT