



**Cyfoeth
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Ein cyf/Our ref:SP3338LF

Eich cyf/Your ref:

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Protherics UK Ltd
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07 March 2017

Permit Reference SP3338LF Protherics – Waste Water Proposals

Dear Ms Ewins,

Thank you for the letter dated 17 February 2017 which sought to clarify how Protherics intends to deal with its waste water. For a number of years we have discussed the possible methods on how this can be achieved but it was in June 2016 that we specified a deadline date for the choice of method and implementation of the chosen method. This date was agreed with Protherics and was considered reasonable. We understand that this is a significant change to the way Protherics operates but we feel that the opportunity to resolve the issue was given sufficient time. The letter we received requests an extension to the April goal and for this to be extended until the beginning of November 2017, seven months later than the agreed deadline.


The two proposed options appear to suggest that Reverse Osmosis (RO) process rejection water will be discharged to the Afon Cwerchyr, under a variation to the existing discharge consent (BP0281501) and that the remaining effluent will be disposed of at a permitted site.

We would like Protherics to clarify that following the completion of the proposed works, the only disposal/recovery route for the effluent is to a disposal site. There is no mention of whether Protherics aims to continue its current method of irrigating the effluent onto its surrounding fields. If we take the letter on face value then we expect that following the November 2017 completion date, all effluent (excluding rejected RO water) will be tankered from site.

In hindsight, considering the work expected to be completed e.g. permit variations, planning permission, bat survey, demolition etc. a deadline of April 2017 may have been optimistic but we did agree this date with Protherics based on its assessment of the expected works.

We will extend the completion date to the beginning of November 2017 but we must emphasise that enforcement action may result if Protherics fails to fulfil its proposed approach.

Sincerely

A handwritten signature in black ink, appearing to read 'Nick Jenkins', written in a cursive style.

Nick Jenkins
Pollution Prevention Control Officer