

Ms Lucy Cleverley
Ramboll
8 Village Way
Tongwynlais
Cardiff
CF15 7NE

Our ref: PAN-005043

Date: 22nd May 2019

Dear Ms Cleverley

We need more information about your application

Application reference: PAN-005043
Operator: Cambrian Pet Foods Limited
Facility: Cambrian Pet Foods Llangadog

Thank you for your application received on 19/03/2019.

We need to ask you for some more information before we can do any more work on it. Please would you provide the following:

- Confirm if the post code of the site should be SA19 9LN or SA19 9LY. The post code is listed differently in the documentation provided.
- A discharge to surface water is to be made via an Effluent Treatment Plant (ETP). There is an existing permit BG0002801 in place for 1000m³/day sewage and trade. Confirm that this application is to consolidate that permitted activity into this installation permit and the discharge will increase to 1820m³/day (1,820,000 litres/day as per the application).
- Confirm the surface water discharge points National Grid Reference (NGR) as it appears to be in a different position on the site map provided compared to the consented discharge point of BG0002801. Confirm the discharge from the ETP is piped directly to the Afon Tywi rather than being discharged to the Afon Bran.
- Please provide the 'Management of Trade Effluent Discharges' (Ref: LG-WI-ENV09), which covers monitoring of wastewater, cleaning, housekeeping, chemical usage, training and awareness, and the disposal of sludge'.
- There appears to be several errors in the H1 assessment and not sure it reflects the proposed discharge volume or content. The H1 also references a

Ffôn/Tel 03000 654552

Ebost/Email kirsty.thomas@cyfoethnaturiolcymru.gov.uk
Kirsty.thomas@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

town called Pontefract so not sure if the correct H1 has been submitted. Please review and resubmit an updated H1.

- Any flocculent (or other chemicals) used in wastewater treatment should be considered in the H1 assessment if they are discharging to the environment.
- Based on the amendments of the H1 assessment, if any substances do not screened out, please provide air quality risk assessment/modelling for the emissions to air. Other air quality assessment to consider/provide:
 - There is no reference to the installation meeting the standards of the MCP Directive. For the new boiler, the MCP, you need to demonstrate you can meet the relevant emission limits in the MCP directive from the start of operation, and that the new boiler will not have any negative impact on nearby sensitive receptors based on human health and conservation targets.
 - The modelling for the Part B activity will need to demonstrate that the aggregated emissions from both boilers are not going to have any negative impact on sensitive receptors based on human health and conservation targets.
 - The existing boiler will need to be permitted as a MCP in the future and meet the relevant MCP emission limit as a standalone unit, as set out in the MCP Directive. This doesn't need to be done yet, can you confirm the existing boiler meet the relevant emission limit now?
 - Currently on the H1, short-term Nox ecological impacts have not screened out. Even though the low level of SO₂ present within the vicinity may be low and that Nitrogen oxides are known to have greater adverse effects in the presence of SO₂ or O₃, there is still the possibility that the emissions could have some affect. We need evidence to justify that there will not be. Please provide Air Quality modelling for any substances not screened out of the H1 assessment. Also, there are other SSSI sites within screening distance that have not been identified as receptors. These are not freshwater sites so could be affected by the NO_x exceedances. Please review and update documents to list all receptors within screening distance and assess the impacts.
- Please provide the RQP v2.6 modelling files.
- Provide justification why you cannot discharge this additional trade effluent to the sewer as you are within a sewerage area.
- You have applied for a Section 5.7 Part A (1)(a) activity rather than the 5.4 Part A (1)(a)(i) as discussed at pre-app. Can you confirm if the ERP is independently operated and if you have applied for the correct activity?
- Please review and update Table 1 in Form B3 to include Section 1.1 Part B(1)(a) activity (MCP new and existing). Also if you have the discharge from the ETP as a listed activity it would not be a DAA also.
- Complete Appendix 8 (part 7) of the B3 form.
- PNN-00206_6_Environmental Risk Assessment has not been provided. Is this the risk assessment that is at the bottom of the Site Condition Report? Please clarify and provide all relevant documentation (including an accident management plan). As above, all ecological receptors within screening area need to be identified in the assessment. Please review and resubmit.
- Provide a noise risk assessment (or is this incorporated in PNN-00206_6_Environmental Risk Assessment?).
- Please review the Opra spreadsheet. Confirm if the emissions to air and water tabs on the Opra spreadsheet have not been completed because emissions are below the emission thresholds.
- An incorrect application fee has been paid. Three fees should have been paid; the Opra based fee for the Part A activities, the Part B fee to cover the

aggregated boilers, and the MCP fee to cover the additional work required to assess the new MCP. You need to pay an additional £1196 for the MCP fixed fee. Appreciate there was some previous discussions regarding application fees and this might have been missed.

- Not all emission points have been clearly labelled on the site plan e.g. emissions from A2 are not on site plan, W1 – surface water discharge is labelled differently on site plan to emissions plan. Please amend site plan to label all emission points as listed in the point source emissions document.
- Update site plan to include all process operations including the Effluent Treatment Plant.
- Provide an energy efficiency assessment/cost benefit analysis as discussed at pre-app.
- You will also need to apply for a Greenhouse Gas permit. Please contact GHGHelp@naturalresourceswales.gov.uk for further information.

If you need advice about how to complete the form, or work out what your fee is, please contact your local area office. Call 0300 065 3000 and ask to speak to your local area office or your site officer.

Please reply within 20 working days from the date of this letter. If we don't hear from you we must return your application and fee.

If you email or write to us please quote the application reference PAN-005043 on any correspondence and send it to the relevant address below.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions please phone me on 03000 654552 or email kirsty.thomas@naturalresourceswales.gov.uk.

Yours sincerely



Kirsty Thomas
Senior Permitting Officer