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**FW: Kellogg's Wrexham - Waste Water Treatment Project**

Zachary, Aled

Sent: 01 December 2014 17:21

To: Jones, Nia [Nia.Jones@kellogg.com]

Cc: Talman, Peter [Peter.Talman@kellogg.com]

Hi Nia,

I've had someone from our water quality team take a look through the information you sent me earlier this year on the ETP project. Based on that information they have come back to me with the following comments :

- The discharge appears to go into a ditch that then becomes the Park Farm Drain (main river) at SJ 39701 50693. With respect to the Water Framework Directive (WFD), this site lies within the waterbody known as "Dee – Chester Weir to Ceiriog". It is a heavily modified waterbody – which means its course is modified for particularly uses, in this case flood defence and water regulation. At present it is not compliant with the WFD, due to issues with invertebrates and phosphate levels, so we would need to be mindful of any new, significant discharges entering this waterbody. The impact of the modifications are also still being looked at.
- The data provided at the minute is far too general to start to provide any indicative limits.
 - BOD, ammonia and phosphate data is needed as a minimum, we would also need to know of any other chemicals that are (a) added ie as part of the process, or (b) that are potentially found in the trade effluent.
 - Depending upon your manufacturing arrangements, it would be necessary to cover all different types of processes that you undertake. For example, if different products are made at different times of the month, or you undertake certain cleaning arrangement for example once a fortnight, it is necessary to capture all these scenarios in any monitoring programme. A week may not be sufficient or indicative of all situations. The highly variable concentrations of solids and COD would suggest changes occur both through a 24 hour period but also day to day, week to week.
 - For a starter, looking at your current limits, the pH banding is far too wide and is likely to be more in the range of 6-9 if applied. Solids will also need significantly reducing.
- The effluent graphs show that the quality is highly variable and often shows peaks and troughs. This needs to be considered when designing any form of treatment plant or additional treatment capacity.
- The current consented daily volume is 1200 m3/day which equates to 13.9 l/s. If this volume is to continue, you would also need to look at any wider implications of the discharge, beyond quality. Is the discharge going to present a flooding risk to downstream land and property? We have spoken briefly to colleagues in the flood teams who are not sure of the implications of this without further information, but as part of the whole, holistic EPR permit, we would suggest you consider this as part of the project.

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- Regarding actual indicative limits: This is something that will go to the one of the permitting teams for modelling, as ultimately they would do any permit review. Another potential option would be for you to run potential emissions through the H1 risk assessment tool to see if they would be classed as "significant" or not. We are also currently unclear at what geographic point any potential limits would be set. The initial discharge point is not to main river, but when that point is reached (at Marshley Farm) we would not anticipate significant dilution, and would suggest that any limits for discharge there will be very tight. Also, as this is not an existing discharge to freshwater, it will be classed as a 'new discharge' which would also indicate quite stringent limits.

Once we have some further information from you on your effluent quality we can provide more guidance on indicative limits, modelling, potential permitted flow rates etc etc.

Again, willing to discuss next week.

Kind regards,

Aled Zachary

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Ein diben yw sicrhau bod adnoddau naturiol Cymru yn cael eu cynnal, eu gwella a'u defnyddio yn gynaliadwy, yn awr ac yn y dyfodol.

Our purpose is to ensure that the natural resources of Wales are sustainably maintained, enhanced and used, now and in the future.

From: Jones, Nia [<mailto:Nia.Jones@kellogg.com>]
Sent: 24 June 2014 11:42
To: Zachary, Aled
Subject: Kellogg's Wrexham - Waste Water Treatment Project

Hi Aled,

Please find attached the final discharge readings for the waste water treatment plant from the 1st January 2013 to the 31st May 2014. I have also attached the email which we have received from Welsh water which confirms that if the project did go ahead they are still happy to keep the current WWTP consent in place.

Kind regards

Nia

Nia Jones
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