

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	EPR/XP3830UR
Name of operator	The First Milk Cheese Company Ltd
Location of Facility	Haverfordwest, Pembrokeshire
Time and date of the detection	13 th March 2022 (Not detected until 25 th July 2022)

(a) Notification requirements for any activity that gives rise to an incident or accident which significantly affects or may significantly affect the environment	
To be notified within 24 hrs of detection	
Date and time of the event	13 th March 2022
Reference or description of the location of the event	Final discharge point from Effluent Treatment Plant W2
Description of where any release into the environment took place	W2, Location 196342, 214759
Substances(s) potentially released	BOD in final effluent discharge
Best estimate of the quantity or rate of release of substances	Volume discharged on 13th March (day corresponding to composite sample) was 1,277m³ No BOD results for the days either side (compliant on previous and subsequent BOD tests). Closest days with in-house COD results are 12th March 55mg/l COD and 14th March 205mg/l, 15th March 128 mg/l. Based on previous results and comparison of typical BOD v COD, the results on 12th & 15th March would be expected to be below 40mg/l BOD, with the result on 14th March marginal. Over the 2 days 13th & 14th March the total volume discharged was 2,632m³
Measures taken, or intended to be taken, to stop any emission	As a temporary measure, surface aerators were sourced and installed on the plant to boost aeration. These remained in place until the diffusers on lane B were all replaced in May 2022 (install started 3 rd May, completed and recommissioned on 27 th May). There were no compliance concerns during this period.
Description of the failure or accident.	The aeration diffusers in aeration lane B of the effluent plant had deteriorated, resulting in larger air bubbles generated by the aeration system, and less fine bubbles. This made it harder to maintain dissolved oxygen levels in aeration lane B, leading to a deterioration in performance of half of the plant, exacerbated by a day of higher loading and low pH influent coming into the plant. Unfortunately, the failure was not detected by the in-house reporting data sent from the ETP to factory management on a daily basis as there is no in-house BOD testing. The external lab samples (which include BOD) results were only shared when the 6 monthly return for the permit was collated at the end of July. At the time of the incident the relationship between First Milk and the supplier of its effluent treatment management was in a difficult stage, (with the supplier subsequently exiting the O&M contract early at the end of May) and the response to the aeration problems in March was slower than it should have been. The site was also in the process of recruiting a new SHE Manager, after the previous SHE Manager retired in January 2022. This combination of factors led to the

	omission to submit a schedule 5 notification at the time of the incident, although measures were taken to bring the plant back into compliance as quickly as possible.
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(b) Notification requirements for the breach of a permit condition	
To be notified within 24 hrs of detection	
Emission point reference/ source	W2, Location 196342, 214759
Parameter(s)	BOD
Limit	40mg/l
Measured value and uncertainty	229mg/l (Uncertainty 23.6%)
Date and time of monitoring	13 th March 2022 (24hr composite sample)
Measures taken, or intended to be taken, to stop the emission	Surface aerators hired in at short notice to regain and maintain plant performance and return discharge to compliant status until full replacement of diffusers could be scheduled. Replacement of diffusers completed during May 2022.

Time periods for notification following detection of a breach of a limit	
Parameter	Notification period
In the event of a breach of permit condition which poses an immediate danger to human health or threatens to cause an immediate significant adverse effect on the environment:	
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.	As above
Measures taken, or intended to be taken, to prevent a recurrence of the incident	The review of the incident has highlighted a weakness in the internal reporting between the ETP staff and the creamery management (partly linked to the retirement of the SHE Manager).

	<i>With the new SHE manager in role from 18th July a change to the way effluent data is reported is being scoped and developed. The plan is to move to a MS Teams platform where all effluent data will be accessible by creamery management as soon as it is available, including external lab test results (these were not routinely shared by Severn Trent, but are now shared by the current ETP O&M contractor Jems). The reporting system will be developed to have a greater emphasis on trending, analysis and alerts/escalation where required in relation to the data from in-house and external lab testing..</i> <i>The intended outcome of the revision to the monitoring programme is to flag and address potential issues with the ETP performance earlier, and to ensure that any breaches are actioned and reported to NRW in a timely manner. This particular breach may have been avoided with a quicker response to the aeration problems to make the improvements before the discharge went out of compliance.</i>
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	<i>The performance of the ETP with the temporary surface aeration was sufficient to maintain compliance. At the earliest opportunity the diffusers were replaced in lane B to bring the plant back to its original condition.</i>
The dates of any unauthorised emissions from the facility in the preceding 24 months.	4th August 2021 16th September 2021

Name*	James Cherry
Post	Environment Manager
Signature	<i>James Cherry</i>
Date	28 th July 2022

* authorised to sign on behalf of the operator