

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	20 th November 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	20 th November 2022
Reference or description of the location of the event	Effluent treatment plant (ETP) recovery plan
Description of where any release into the environment took place	W2, Location 196342, 214759
Substances(s) potentially released	Phosphates and Aluminium in final effluent discharge
Best estimate of the quantity or rate of release of substances	Phosphates above limit 24/11/2022 Ammonia above limit 24/11/2022 BOD above limit 24/11/2022 TSS above 24/11/2022 Information confirmed by UKAS lab results receipt. Volume for the day: 1417m3.. Phosphates 10.9 mg/l Ammonia 27.5 mg/l BOD 502 mg/l TSS 408 mg/l
Measures taken, or intended to be taken, to stop any emission	Please refer to: - the telephone conversation of 22/11/2022 with NRW - the summary email of 23/11/2022 to NRW - the previously submitted "Process Management Plan for ETP Recovery"
Description of the failure or accident.	Please refer to: - the previously submitted "Process Management Plan for ETP Recovery" In summary there was a release of caustic into the effluent treatment plant (ETP) causing a raise in effluent pH levels in the balance tank. Elevated pH levels in the effluent caused by the caustic entered the Activated Sludge Plant (ASP) and affected the biological treatment process. A response plan was initiated to minimise the effect of this which was initially discussed with NRW on 22/11/2022.

	Within that document, River Modelling was carried out which indicates at which concentrations, the Final Effluent would begin to cause harm through oxygen deficit or toxicity to the River Cleddau. The river modelling indicates that the Discharge BOD (95 %ile) would need to be 1000 mg/L before the downstream BOD would cause local oxygen deficit, which is significantly higher than the BOD figure of 502 mg/L measured on 24/11/2022. Similarly, the river modelling indicates that the Discharge Ammonia (95 %ile) would need to be 240.6 mg/L before Ammonia toxicity could occur in Fish or Invertebrates. This is significantly higher than the Ammonia figure of 27.5 mg/L measured on 24/11/2022. The river modelling exercise considered typical discharge volumes from the site in its calculations.
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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)	Phosphates 10.9 mg/l Ammonia 27.5 mg/l BOD 502 mg/l TSS 408 mg/l
Limit	Phosphates 5 mg/l Ammonia 10 mg/l BOD 40 mg/l TSS 60 mg/l
Measured value and uncertainty	Results from analysis by a UKAS laboratory.
Date and time of monitoring	20/11/2022 to 28/11/2022
Measures taken, or intended to be taken, to stop the emission	Please refer to: - the attached "Process Management Plan for ETP Recovery"

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
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Measures taken, or intended to be taken, to prevent a recurrence of the incident	Further to the detail within the Process Management Plan for ETP Recovery document: A root cause analysis exercise has been carried out at the creamery site with the engineering and operations teams with the aim of minimising the chances of a similar loss of caustic to drain. Actions relating to isolation control will be implemented. A similar exercise has been carried out at the ETP by the ETP operator to review response to the caustic and what can be done to make the plant process and equipment more robust to such an event. A report has been generated and actions listed for the ETP Operator to progress.
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	Please refer to the Process Management Plan for ETP Recovery document in which a River Modelling exercise has been carried out to ascertain the potential impact on the environment. At present there is no planned works anticipated to be required to rectify any pollution.
The dates of any unauthorised emissions from the facility in the preceding 24 months.	13 th March 2022

Name*	Neil Shawcross
Post	SHE Manager
Signature	<i>Neil Shawcross</i>
Date	15/12/2022

* authorised to sign on behalf of the operator