

Our Ref: EPR/WP3231NB

Mr John Potter
Dairy Partners (Cymru Wales) Ltd.
The Creamery
Aberarad
Newcastle Emlyn
Carmarthenshire
SA38 9DQ

Date: 23rd October 2023

Dear Mr Potter

EPR- WP3231NB Dairy Partners (The Creamery, Newcastle Emlyn) Improvement Conditions Review

Thank you for submitting Dairy Partners' responses to discharge the requirements of Improvements Conditions (IC) 19 of the environmental permit EPR-WP3231NB.

- Email received on 26/09/2023 from John Potter (Dairy Partners) with response to IC19.

Documents received from Dairy Partners:

- IC19 – Dairy Partners Refrigerants Overview 26092023

As you are aware, ICs were included as part of a recent permit variation (application made to include the upgraded Effluent Treatment Plant (ETP)) which was issued by NRW in March 2023. The permit also underwent a review and was varied (May 2023) following the publication of the revised Best Available Techniques (BAT) Reference Documents (BREF) for Food, Drink and Milk Industries. Some additional Improvement Conditions have been included to bring the site up to the necessary standard. Further IC responses will be required from the site in due course.

We have reviewed the response to IC19. Please see comments below.

The Operator shall submit to Natural Resources Wales an updated written procedure following additional investigatory work describing how they intend to meet the following BAT requirements in accordance with the requirements specified within:

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| IC19 | <ul style="list-style-type: none">• <i>BAT Conclusion 9 of the Food, Drink and Milk Industries BRef Document (EU 2019) – In order to prevent emissions of ozone depleting substances and of substances with a high global warming potential from cooling and freezing, BAT is to use refrigerants without ozone depletion potential and with a low global warming potential</i> |
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The report should include but not limited to:

- ***a review of the use of the current refrigerant(s) as to whether they meet the BAT requirements as specified above and;***
- ***a feasibility study and implementation plan (if appropriate) regarding the replacement of the current refrigerant(s) with one with a lower global warming potential and no ozone depletion potential. Suitable alternatives include but not limited to ammonia, water and carbon dioxide.***

The report shall be submitted to Natural Resources Wales by the date specified for review. Natural Resources Wales will review the report to determine if the above BAT requirements have been achieved.

The report submitted to NRW provides information in response to IC19. However, some additional information is required.

Please see the following comments:

- Refrigerants with high Global Warming Potential (GWP) are still being used at site. R404A used in the deep freeze unit 4 in particular is a banned F gas for refilling equipment. Further information is available on gov.uk website.

Based on the response provided, deep freeze unit 4 along with other major refrigerant systems are reaching life expiry. Please provide details and timeframes on the replacement of these units and an implementation plan (including details on low GWP refrigerants to be used).

- BAT is to use refrigerants without ozone depletion potential and with a low global warming potential. The report provides details of other cooling apparatus on site that also use refrigerants with high GWP (e.g. R410A), but stated that it is not feasible to replace serviceable cooling apparatus with a lower GWP alternative due to the financial costs. Further information is required in terms of the feasibility of such change and relevant implementation plan. Are there any other reasons (other than financial reasons) for changing to lower GWP refrigerants?

You will need to review and submit a response/updated document to NRW by the 1st of November 2023 (unless otherwise agreed in writing with NRW).

Yours sincerely



Kirsty Thomas

Lead Specialist – Industry Regulation

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.