

Our Ref: EPR/WP3231NB

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

Date: 1st March 2024

Dear Mr White

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

Thank you for submitting Dairy Partners' updated response to discharge the requirements of Improvements Condition (IC) 20 of the environmental permit EPR-WP3231NB.

- Email received on 22/12/2023 from John Potter (Dairy Partners) with an updated response to IC20.

Documents received from Dairy Partners:

- IC20 - EHS-MISC-001 Dairy Partners Odour Management Plan – Issue 4
21.12.2023

We have reviewed the updated response provide in relation to IC20 with assistance from NRW's Air Quality and Noise Team (AQNT).

Our review has been undertaken using relevant guidance including: the Best Available Techniques Reference Document for the Food, Drink and Milk Industries (2019); Best Available Techniques Reference Document for Waste Treatment (2018); JRC Reference Report on Monitoring of Emissions to Air and Water from IED Installations; H4 Odour Management How to comply with your environmental permit (H4), Guidance on the assessment of odour for planning - Institute of Air Quality Management Version 1.1 (July 2018) and the Environment Agency's Odour Management Plan Template Final V2 05/05/21.

NRW acknowledges that the OMP (EHS-MISC-001 Dairy Partners Odour Management Plan – Issue 4 21.12.2023) has been updated and addressed several of the comments raised in NRW's response letter dated 17.11.2023, however not all comments have been addressed and the OMP still contains insufficient detail to discharge IC20.

Please see the following comments for your consideration:

1. Sources

- The OMP still primarily focuses on the potentially odorous emissions from the Effluent Treatment Plant (ETP) only, with other sources potentially being overlooked/not having been assessed. Therefore, it is unclear if there are potential odour sources outside of the ETP area (e.g. the creamery itself - cheese manufacturing process, supporting plant, odorous material entering and leaving site).

The OMP must be updated to include detailed information/assessment results of potential odour from **all areas** of the site. If other areas of site (including the creamery) are deemed not odorous following an assessment, the OMP must state this information, including justification of why no odours expected.

- The OMP has been updated to include odour descriptions from each ETP source, including details on intensity, characteristics, and hedonic score. It is noted characteristics have been identified based on the opinion of the author of the OMP.

Following NRW Officers recent visit to the site, offensive odours were noted at the crude pit, sludge pit and DAF plant on site yet some odour sources are noted as having no odour/neutral odours within the odour descriptions table of the OMP. We cannot confirm how the scores assigned to the odour sources have been derived and whether they are appropriate. Please review and provide justification for the scores assigned.

- Section 2.2 of the revised OMP states there are no odour controls for the sludge tanks. NRW suggests this is updated to state sludge tanks are enclosed vessels and make reference to the sludge transfer odour control measures already in place.

2. Mitigation - Appropriate Measures/Best Available Techniques

Dissolved Air Flotation/ DAF

- The OMP states that replacement carbon filters/media can be easily obtained once identified as failed – these filters are not currently stored on site and readily accessible. The replacement of filters should be carried out in line with the manufacturer's instructions, and you should not wait until the filter has failed. See **CAR-NRW0043321** (issued 14.02.2024) following NRW's site inspection for further details and actions relating to this topic. The OMP must be updated with relevant information to address this concern.

Open crude and sludge pits

- As per NRW's previous response, open pits containing primary sludge, which in H4 is considered the most offensive odour criteria, are not considered an appropriate measure. The sludge and crude pits must be

covered, and potential odours managed to reduce fugitive emissions of odour leaving site (unless agreed with NRW otherwise).

See **CAR-NRW0043321**, issued 14/02/204 following NRW's odour focused site inspection for further details and actions relating to this topic. The OMP must be updated with relevant information to address this odour source concern.

Aeration tank (Uncovered)

- The OMP states that the [open] aeration tank is not considered 'a significant source of odour by AQC'...when it is operated efficiently. It is recognised that odours from aeration tanks will be lower than primary treatment (DAF) however, we would recommend that Dairy Partners undertakes a cost benefit analysis for the covering of the aeration tank and any associated odour control measures. This item has not been explored and no cost benefit analysis has been provided.

BAT

- The OMP states: "*In addition to the odour control measures outlined in Paragraph 2.0, Dairy Partners continues to seek improvements to its odour controls relevant to the limited odour sources and potential odour characteristics that nearby receptors may be exposed to. Control measures such as regular inspection and cleaning of storage pits and the odour abatement systems installed on the main potential source of odour (DAF 1) are compliant with BAT. Supporting plant such as pumps, valves and pipework have not been identified as a potential source odour, therefore, investing in high-integrity equipment above what is already installed is not considered feasible at this stage*". If the supporting plant has been assessed as not a potential odour source, then this statement appears reasonable). However, NRW has not seen the assessment of the supporting plant to confirm these assumptions (see odour source comments in section 1). It is recommended that Dairy Partners should use high integrity equipment when equipment needs replacing.

3. Odour Monitoring

- NRW previously advised that data from each three-year formal monitoring investigations (undertaken by a specialist independent odour consultant) may not be sufficient to determine continuous improvement, therefore we would recommend that this is reduced to a maximum of two years but preference would be annually.

The OMP still states formal monitoring will be undertaken each three years without any justification. Dairy Partners must review the formal monitoring frequency and update the OMP as required.

4. Odour Reporting

- Complaints Reporting – The OMP is still lacking details regarding timings for reporting to NRW, investigating complaints. Reporting events to NRW must be in line with the requirements of the sites environmental permit

and without delay (must be clear when the site will submit a Schedule 5 Notification to NRW). This should be made clear in the OMP.

5. Other

- Air Quality Consultants Ltd (AQC) reports referenced in the OMP have not been validated at this time.
- Other supporting documents referenced within the OMP have not been reviewed/reviewed in detail. NRW will not be providing comment on supporting documents at this time and this response does not indicate acceptance of the supporting material.

CAR-NRW0043321 includes several actions for the Operator to complete which has direct links to the OMP and the comments above. It is recommended that actions within CAR-NRW0043321 are completed first and agreed with NRW. Once complete, a revised version of the OMP can be finalised.

Please review the comments above and update the OMP as necessary. You will need to review and submit a response/updated document to NRW by the 31st of March 2024 (unless otherwise agreed in writing with NRW and pending completion and sign off of related actions in **CAR NRW0043321**).

Yours sincerely



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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.