

Our Ref: EPR/WP3231NB

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

Date: 5th September 2024

Dear Mr Daniels

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.

Documents received from Dairy Partners:

- IC20 - EHS-MISC-001 Dairy Partners Odour Management Plan - Issue 5 15.07.2024
- Technical Note: Dairy Partners (Cymru Wales Ltd) Odour Review - Carmarthenshire, Dairy Partners J10-12625G-10_F2

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 5 15.07.2024) has been updated and addressed several of the comments raised in NRW's response letter dated 01.03.2024, 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:

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- The revised OMP (issue 5) addresses many of our previous comments but you have still not addressed the comments relating to a cost benefit analysis looking at covering the open tanks and pits, this is a requirement of the Best Available Techniques (BAT) Reference Document for Waste Treatment (2018) (WT BREF) – “*Cover or enclose facilities for storing, handling, collecting and treating odorous waste (including waste water and sludge) and collect the odorous waste gas for further treatment*”. You must provide a cost benefit analysis detailing the cost vs the benefit. This may be presented in the form of a report.
 - Table 2 of the Technical Note summarises the BAT assessment undertaken on-site. The information here appears reasonable, however, this table states that no further action is required for either the aeration tank or the crude & sludge pits. These areas have been previously identified as potential odour sources, however, the wording in Table 2 for the aeration tank states: *‘the cost of covering the tank would significantly outweigh the benefits’* and for the crude and sludge pits states that: *‘full containment and odour control are not judged to bring the benefit associated with the cost for such a source that was not noted either onsite or offsite’*. However, as we have previously stated above, it is BAT to cover open tanks, therefore, you must conduct a cost benefit analysis and provided the information to NRW for review.
 - It has been noted previously that the sludge tank vents are a potential odour source, the OMP does not specifically mention the sludge tank vents in the potential odour sources section. Section 2.2 details carbon filters on the tanks and a carbon filter unit used to treat odorous displaced air from the tanker. However, the specific information relating to the sludge tank vents should be included in the OMP, including Appendix 5 which looks at the passive odour control systems specifications.
 - Amend the table in Section 2.4 to include further details for the failure of abatement measures relating to the replacement of carbon filters/media, including frequency of replacement (include reference to applicable SOP’s). From recent discussions, Dairy partners have confirmed that all carbon filters are to be replaced every 12 months (assuming this is in line with the manufacturers guidance?). It is NRW’s understanding that SOP’s and engineering systems have been updated to identify when filters need changing. The OMP does not reflect this. Please review and update. In addition, the text in section 4.0 should be updated to reflect the above comments. Finally, the *‘unfiltered sludge tank vents’* should be updated with the newly proposed sludge vent piping/abatement technique. Please ensure the entire OMP reflects the updates in relation to the sludge tank vent and the newly fitted odour abatement equipment implemented.
 - The creamery has now been included into the odour source table in Section 2.0 (Sources, Releases, Impacts). However, changes have been made to the intensity score, hedonic score, and characteristic description of the sludge transfer area. The accompanying technical
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note which covers the most recent sniff testing states: '*Strong sewage-type odours were detected on-site.*' Provide further information as to how they have reached this decision.

- 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. 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.

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 20th of September 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.