

Our Ref: EPR/XP3830UR

Mr Neil Shawcross
The First Milk Cheese Company Limited
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SA61 1JN

Date: 28th October 2024

Dear Mr Shawcross

EPR- XP3830UR First Milk (Haverfordwest Creamery) Improvement Conditions Review

Thank you for submitting First Milk's updated response to discharge the requirements of Improvement Condition (IC) 6 of the environmental permit EPR/XP3830UR.

- Email received on 09/08/2024 and the 15/10/2024 from Neil Shawcross (First Milk) with an updated response to IC6 and associated documents.

Documents received from First Milk:

- SHE-POL-016 Noise Management Plan v3.pdf.
- 2024.05 J004582-7849-02 First Milk Haverfordwest Noise Assessment Issue 02 Full.pdf

NRW have undertaken a third review of the NMP submitted for review (v3). We have reviewed the updated response provided in relation to IC6 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); Environment Agency guidance (GOV.UK published guidance) – Guidance "Noise and vibration management: environmental permits" (January 2022), section specifically relating to NMPs.

Conclusions

NRW acknowledges that the NMP (SHE-POL-016 Noise Management Plan v3.pdf) has been updated and addresses some of the comments raised in NRW's response letters dated 16.01.2024 and 10.05.2024. However, not all updates are sufficient and additional comments are raised following the completion of the sites Noise Impact Assessment (NIA)

to inform the NMP. Please note a detailed assessment of the NIA has not been carried out at this time and any new noise sources that are to form part of the permit variation to increase site capacity will not be reviewed/agreed as part of this IC review work.

The results presented in the NIA indicate a potential for significant adverse impact at sensitive receptors and therefore potential mitigation measures have been presented in that report. However, Appendix 2 of the NMP states that the residual risk for all sources is "not significant", and therefore no noise reduction programme is suggested proposed by First Milk. The findings of the NIA and the NMP contradict each other. The NIA indicates that implementing a noise reduction programme is likely to be essential to prevent and/or reduce noise at receptors.

Noise monitoring data gathered from the NIA has been used in this revision of the NMP, but it is difficult to see how First Milk will respond to increased sound levels when there is a range of expected noise levels at monitoring points. A representative single value for each monitoring position should be considered.

Please review and update the NMP accounting for the conclusions outlined above and also taking into consideration the further detailed comments below.

An updated NMP is expected once mitigation measures identified in the NIA have been systematically implemented. The amended version should also include any omission outlined in the comments section below.

Comments:

1. Responsibilities and review

- No further information has been provided by First Milk to support its claim that 'skills, competencies and training requirements for staff are documented and recorded within the EMS.' This statement can be supported by including references to specific documents/procedures within the operator's EMS.

2. Noise sources

- Appendix 2 and Section 4.2 of the NMP outlines the noise sources and the control measures in place to ensure noise is controlled. Section 4.2 of the NMP has been amended to reference the completion of the NIA in 2024 but it is clear from the NIA that a large number of mitigation measures are proposed to reduce the impact of sound upon sensitive receptors. It is not clear in this section of the submitted NMP how First Milk intends to implement these mitigation measures required by the IC in the site noise reduction programme, nor is it clear whether any of the proposed control measures outlined in Appendix 2 of the NMP will be implemented. Appendix 2 gives the reader the impression that all noise sources are 'not significant' and therefore no action is required to reduce the impact. This directly contradicts the detail provided in the NIA and its conclusion, and therefore this element of the revised NMP has not met the requirement of the IC to provide a noise reduction programme.

- The ammonia plant which was previously listed as a noise source in v2 NMP is no longer clearly listed as an item in Appendix 2. Please confirm where the ammonia plant noise source is listed, and update as required.
- Vehicle movements around site including raw milk delivery must clearly detail the hours at which certain operations can happen (i.e., not during antisocial hours) – It is recommended that the restricted times during hours of operation details are specified in the 'pattern of release' column of Appendix 2. Please review and consider restricted operating times for all activities.

3. Noise monitoring and mitigation

- NRW's previous recommendation specified that First Milk should consider defining what it would consider as unacceptable noise emissions, this could include a certain number of complaints, timing, elevated sound levels measured or perceived at receptors. Section 5 of the NMP presents a six-monthly noise monitoring schedule at 6 receptors around the site. First Milk also proposes a quantitative threshold for investigating when sound levels increase above a defined range (Table 3). These trigger levels for responding are in excess of 5 dB above and greater than 10 dB. The SHE departmental managers are responsible for ensuring that procedures are in place for noise management on site.

We welcome the proposal to monitor sound from the installation and the action levels suggested, but due to the range of expected sound at each of the six monitoring points it is difficult to see how a 5 dB increase in the lowest expected noise level would instigate an action, as this is within the expected range. All monitoring locations have a range of 6 dB and therefore a review of action(s) required to resolve an identified issue may not take place due to it falling within the expected range. First Milk should consider a single figure which is representative of the sound at each location. Suitable justification for any single value(s) provided should be included in the NMP.

In addition, the quality of the noise monitoring will be formed by the competence of the staff undertaking the measurements and the quality of the equipment used. We would recommend that a suitable sound level meter is used rather than a noise meter app and that suitably trained staff have an awareness of measuring environmental sound to ensure that the readings provided are useful and do not result in actions taking place that are not required, saving time and resources.

Staff training can be carried out in accordance with a suitable internal procedure documented within the site EMS or by an accredited third-party supplier. Identities of suitably trained staff should be recorded within the site EMS to ensure that at least one individual is available on-site (or can be contacted) in the event that monitoring is required.

For all points above reference to relevant document/section of the sites wider EMS should be included. No document references have been provided in the updated NMP. There is only reference to the wider site Environment Management System.

Please review the comments above and update the NMP as necessary. You will need to review and submit a response/updated document to NRW by 15/11/2024 unless agreed otherwise with NRW.

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.