

Natural Resources Wales Permitting Decisions

Dunbia (UK) (Teify Park Abattoir and Meat Processing Plant)

Decision Document

Application for a Normal Variation

The application number is: PAN-023541

The permit variation number is: EPR/BV9683IH/V007

The operator is: Dunbia (UK)

**The Installation is located at: Teify Park Abattoir and Meat Processing Plant,
Teify Park, Lampeter Road, Llanybydder, Carmarthenshire, SA40 9QE**

Purpose of this document

This decision document:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the operator's proposals.

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Glossary of acronyms and definitions used in this document

AEL - Associated emission level

AMP-Accident management plan

EMS-Environment Management System

1. Executive summary

1.1. Application summary

This variation adds one 2.5 MW thermal input (MWth) gas oil fuelled hot water boiler within the existing installation boundary. The boiler is classed as a new simple bespoke Medium Combustion Plant (MCP) This variation also:

- Adds one electric powered steam boiler
- Adds one air source heat pump
- Relocates the crate wash
- Decommissions emission points at A1 and A2
- Confirms the change of registered office address

During determination, and by email on 25/04/2024, the operator applied to install a white diesel storage tank to the installation, and confirmed on 02/05/2024 that this is a directly associated activity (DAA) as per our Regulatory Guidance note RGN2. The capacity of the storage tank is 5000L. Therefore this application also adds one white diesel storage tank of 5000L capacity. Document LLANEPV-C2-5a.2 shows the location of the proposed equipment confirmed above.

1.2. Our decision

We have decided to issue the variation for Teify Park Abattoir and Meat Processing Plant operated by Dunbia (UK)

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

2. Receipt of the application

The application was received on 16/10/2023. In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- Confirmation that boilers at emission points A1 and A2 were to be decommissioned, and also the proposed operating hours of the new hot water boiler - a new Medium Combustion Plant (MCP)
- Updated risk assessment and site plans

- Confirmation that there will be no changes to the emissions to water following the relocation of the crate wash.
- Air quality assessment and technical specification for the proposed MCP
- Confirmation on Best Available Techniques (BAT)

A letter requesting this information was sent to the operator on 25/01/2024 with additional requests for information sent on 22/02/2024. Upon receipt of this information on 31/01/2024, 06/03/2024, and 13/03/2024 we were able to consider the application duly made. This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

3. Confidential information

The operator made a claim for no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

4. Legislation

The variation will be issued, under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 (EPR). The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an installation as described by the Industrial Emissions Directive 2010/75/EU (IED)
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed
- Medium Combustion Plant Directive (MCPD)

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent

significant damage to ecosystems. We consider that, in issuing the variation a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

As the EPR regulator in Wales, NRW are required to determine any duly made permit application. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement¹ gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

¹ [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

5. Consultation

There was no requirement to carry out a consultation as part of this normal variation. The decision was taken in accordance with the Environment Permitting Regulations (EPR), our Public Participation Statement¹ and our Regulatory Guidance.

6. Requests for information

Further information was requested during determination by way of a Schedule 5 Notice requiring the operator to provide further information relating to the air quality assessment and also a risk assessment for the new white diesel storage tank, a proposed directly associated activity. Please see section 10.1 for more technical detail on emissions to air, and section 9.3 for details on containment for the white diesel storage tank. The Schedule 5 Notice was sent on 13/06/2024 and we received all the information required on 09/09/2024. We also requested an updated revised “Location of proposed equipment changes” drawing, which also confirms the location of the new white diesel storage tank/ directly associated activity on 23/07/2024. We received this on 08/08/2024. The additional information supplied satisfied the requirements of the Schedule 5 Notice. A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received.

7. The Installation

7.1. The permitted activities

The regulated facility is currently an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- Section 6.8 Part A(1)(b) slaughtering animals at a plant with a carcass capacity of more than 50 tonnes per day
- Section 6.8 Part A(1)(d)(i) “Treating and processing material intended for the production of food products from animal raw materials (other than milk) at a plant with finished production capacity of more than 75 tonnes per day”
- Section 5.4 Part A(1)(a)(i) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving biological treatment
- Section 5.4 Part A(1)(a)(ii) Disposal of non-hazardous waste with a capacity exceeding 50 tonnes per day involving physico-chemical treatment.

An installation may also comprise “directly associated activities”, which at this Installation includes:

- Burning oil in combustion plant rated at ca. 1.4 & 1.2 MWth
- Discharge to surface water
- Refrigeration

Together, these listed and directly associated activities comprise the Installation.

This variation will add a 2.5MWth Medium Combustion Plant to the listed activities, under Schedule 25A of the EPR with activity reference A5 and removes the 1.4 & 1.2 MWth combustion plants. This variation also confirms that the 5000L white diesel storage tank, electric powered steam boiler and the air source heat pump are directly associated activities. They have been given activity references A8, A9, and A10 respectively and Table S1.1 in Schedule 1 has been updated.

7.2. Changes to the installation

This variation will add a 2.5MWth Medium Combustion Plant to the listed activities, and removes the 1.4 & 1.2 MWth boilers. As per Section 7.1 above, this variation also confirms that the 5000L white diesel storage tank, electric powered steam boiler and the air source heat pump to be directly associated activities. In addition the crate wash has been relocated and an additional 1569kg Ammonia will be added to the system for use in the air source heat pump. Please note, refrigeration is already listed as a directly associated activity in the permit.

8. Operation of the installation

8.1. Operator competence

The operator is the sole operator of the Installation. We are satisfied that the operator is the person who will have control over the operation of the Installation after the variation is issued; and that they will be able to operate the Installation so as to comply with the conditions included in the permit. The decision was taken in accordance with EPR RGN 1 Understanding the meaning of operator².

Relevant Convictions

² [RGN 1 Understanding the meaning of 'operator' \(naturalresources.wales\)](#)

The operator has declared they have no relevant convictions. NRW's COLINS Database has been checked to confirm there are no relevant convictions. No relevant convictions were found.

Financial Provision

The operator has declared they have no current or past bankruptcy or insolvency proceeding against them. There is no known reason to consider that the operator will not be financially able to comply with the permit. The decision was taken in accordance with RGN 5 on Operator Competence.

8.2. Environmental Management System

The operator has stated in the application that they will implement an Environmental Management System (EMS) that will meet the requirements for an EMS in our “How to comply with your environmental permit” guidance³ The site operates under an environmental management system accredited to ISO14001 and an energy management system accredited to ISO50001.

The operator has submitted a summary of the EMS with their application and has confirmed the following sections of the EMS will be updated following this variation:

- Environmental and Energy Policies
- Accident Management Plan and Emergency Response Procedure
- Noise Management Plan
- Planned Preventative Maintenance to include scheduled cleaning, servicing and repair of new equipment installed, as per manufacturer's recommendation.

We have reviewed the application and are satisfied that appropriate management systems and management structures will be in place for this Installation, and that sufficient resources are available to the Operator to ensure compliance with all the Permit conditions.

Accident management

³ [Natural Resources Wales / Guidance to help you comply with your environmental permit](#)

The EMS includes an Accident Management Plan. The operator has confirmed that as part of the works associated with this permit variation application, that the Accident Management Plan & Emergency Response Procedure will be reviewed and updated. In order to ensure that the management system proposed by the operator sufficiently manages the residual risk of accidents, permit condition 1.1.1a requires the implementation of a written management system which addresses the pollution risks associated with, amongst other things, accidents.

8.3. Operating techniques

Installation activities and assessment of Best Available Techniques

The operator has described the proposed equipment and operating techniques and compared these against the relevant guidance notes and Best Available Techniques conclusions (BATc) which for an installation of this type is:

- Guidance for Slaughtering of Animals (Cattle, Sheep and Pigs) Sector, Sector Guidance Note IPPC S6.12, Environment Agency 2002.
- How to comply with your environmental permit: Additional guidance for The Red Meat Processing (Cattle, Sheep and Pigs) Sector (EPR 6.12), Environment Agency 2009.
- Industrial Emissions Directive 2010/75/EU best available techniques (BAT) conclusions for the food, drink and milk industries (published 2019).
- The Industrial Emissions Directive 2010/75/EU best available techniques (BAT) conclusions for The Slaughterhouses, Animal By-Products and/or Edible Co-Products Industries (published 2023)

The Operator has confirmed it will comply with the appropriate Technical Guidance Notes and Best Available Techniques conclusions (BATc). We have reviewed the techniques proposed and consider them to represent BAT at this installation and meet the requirements outlined in the TGN.

We have specified that the operator must operate the permit in accordance with descriptions in the application, including all additional information received as part of the determination process. These descriptions are specified in the Operating Techniques (Table S1.2) table in the permit and will include the following reports

specified in the environmental risk assessment, document LLANEPV-C-2-6 V3 received on 24/06/2024, and also the Environmental Management System, a summary of which was received on 16/10/2023:

- Spill Response Instructions
- Site Environmental risk assessment and Response Plan
- Interceptor and spillage response procedure
- Chemical storage and handling procedures
- Training of operators
- Fire management plan
- Emergency Response Procedure
- Environmental and Energy Policies
- Accident Management Plan and Emergency Response Procedure
- Noise Management Plan
- Planned Preventative Maintenance to include scheduled cleaning, servicing and repair of new equipment installed, as per manufacturer's recommendation

As the hot water boiler is an MCP, the site must adhere to the following operating techniques specific for MCP:

- Each MCP must be operated in accordance with the manufacturer's instruction and records must be made and retained to demonstrate this.
- The operator must keep periods of start-up and shut down of each MCP as short as possible.
- There must be no persistent emission of 'dark smoke' as defined in Section 3(1) of the Clean Air Act 1993.

Monitoring of point source emissions to air will be carried out in line with the monitoring requirements outlined in Monitoring stack emissions: low risk MCPs and specified generators, formally known as TGN M5. No further additional controls for monitoring are required.

Efficient use of raw materials

Having considered the information submitted in the application, we are satisfied that the applicant will ensure that raw energy, water energy is used as efficiently as possible. The operator has confirmed that the proposed changes will not result in any additional water volume to be used. The site operates under an energy management system accredited to ISO50001.

The operator will be required to report energy usage under condition 4.2 and Schedule 4 of the permit. The following parameters are required to be reported: water and energy use. This will enable us to monitor energy recovery efficiency at the Installation.

9. The site

9.1 Site Plan

The operator has provided an updated plan which we consider is satisfactory, showing the extent of the site of the facility and its new and existing emission points.

The updated plan will be included in the permit and the operator will be required to carry on the permitted activities within the site boundary.

9.2 Site Condition Report

The proposal does not include the addition of any land and so a Site Condition Report was not required to support this application.

9.3. Site protection: potentially polluting substances and prevention Measures

The operator has a duty to ensure that soil and groundwater are protected in order to meet the requirements of Articles 14 (1)(b), 14(1)(e) and 16(2) of the IED.

An additional 1569kg Ammonia will be added to the system for use in the Heat Pump. The operator has confirmed that all controls already in place for the refrigeration system will be extended to encompass the heat pump e.g. Planned Maintenance Schedule, suitably competent engineers to work on the system, bunded heat pump plantroom, alarming system. The existing gas oil tank and fuel supply line will be used for the new hot water boiler, therefore all existing controls will remain in place. A new white diesel storage tank with capacity of 5000L will be installed to the west of the site, and is a directly associated activity. The risk assessment confirms that this fuel store will be integrally bunded to 110%. We have requested by way of an improvement

condition that a report shall be submitted to NRW demonstrating that the containment systems and supply line constructed on site for the new white diesel storage tank and the plant room meet CIRIA guidance C736 'Containment systems for the prevention of pollution'. We have requested that an updated drainage plan be submitted. We have also requested by way of a second improvement condition that the Operation Techniques are updated in line with the operator's Environmental Management System and risk assessment for the new white diesel storage tank, the new gas oil boiler, the new electric powered steam boiler and the air source heat pump. Please see Section 12.5 of this document for more information.

Based upon the information in the application we are satisfied appropriate measures will be in place to protect the site and its surroundings from polluting substances.

10. Environmental Risk Assessment

Regulated activities can present different types of risk to the environment, these include odour, noise and vibration; accidents, fugitive emissions to air and water; as well as point source releases to air, water, sewer and discharges to ground or groundwater, global warming potential and generation of waste. All these factors have been considered during our determination and the relevant risks from this proposal are discussed in this and other sections of this document.

The next sections of this document explain how we have approached the critical issue of assessing the likely impact of emissions from the Installation on human health and the environment and what measures we are requiring ensuring a high level of protection.

In line with our guidance, the operator has provided an environmental risk assessment with the application which identifies the sources of key risks from the variation, possible pathways and receptors. This risk assessment and further assessments provided by the operator and/or completed by NRW will be discussed in further detail below.

10.1. Assessment of impact on air quality

This section of the decision document deals primarily with the dispersion modelling of emissions to air from the stack and its impact on local air quality.

The operator has assessed the Installation's potential emissions to air against the relevant air quality standards, and the potential impact upon human health. These assessments predict the potential effects on local air quality from the Installation's stack emission.

The air impact assessments, and the dispersion modelling has been based on the Installation operating continuously at the relevant long-term or short-term emission limit values, i.e. the maximum permitted emission rate. We are in agreement with this approach.

The operator completed an air emission risk assessment using the H1 tool for nitrogen dioxide, NO₂. The operator has calculated process contributions (PC) and predicted environmental concentrations (PEC) at locations within the immediate vicinity and all identified sensitive receptor locations.

Emissions of nitrogen dioxide (NO₂) was assessed against a long-term critical level of 40µg/m³ (annual) and short term critical level of 200 µg/m³ (hourly). At sensitive receptor locations the maximum predicted long-term PC was > 1% and the long-term PEC was <70 % of the long-term critical level. Therefore, in accordance with the relevant guidance the long-term impacts from NO₂ can be considered as insignificant. At sensitive receptor locations the maximum predicted short-term PC was <10 % of the short-term critical level. Therefore, in accordance with the relevant guidance the short-term impacts from NO_x can be considered insignificant.

Emission limits

We have decided that emission limits should be set for the parameters listed in the permit. Emission limit values for the new MCP are in line with those contained within the Medium Combustion Plant Directive (MCPD). In line with current internal interim NRW guidance, for individual combustion units at installations subject to the Industrial Emissions Directive (IED) with a thermal input of <15MW, the emission limit values

contained within the MCPD are considered indicative of Best available Techniques (BAT) The following substances have been identified as being emitted in significant quantities and Emission Limit Values (ELVs) based on BAT have been set for those substances - oxides of nitrogen (NO_x). There are no ELVs set for carbon monoxide (CO) however there is a requirement for CO to be monitored.

It is considered that the ELVs or technical measures described above will ensure that significant pollution of the environment is prevented and a high level of protection for the environment secured.

Based upon the information in the application and the measures that will be imposed by the permit we are satisfied that the appropriate measures will be in place to protect air quality for the environment and human health.

10.2. Assessment of impact to surface and ground water

The proposal does not include a direct discharge to surface water. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

10.3. Emissions to sewer

The proposal does not include an additional discharge to sewer. The crate wash water is being relocated to inside the factory building. It will enter the factory's drainage system and continue to go to the on-site effluent treatment plant before being discharged to emission point W2. The applicant has confirmed that there will be no change to the effluent plant loading as a result of this change. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of surface waters as a result of the sewer discharge.

10.4. Fugitive emissions

The operator has not identified any fugitive emissions in their environmental risk assessment: Permit condition 3.2.1 requires that emissions of substances not controlled by emission limits (i.e., fugitive emissions) shall not cause pollution. Condition 3.2.2 requires that a management plan shall be developed if pollution is subsequently identified.

10.5. Assessment of odour impact

There are sensitive receptors within the vicinity of the installation - local residents in Llanybydder, across the river in Altyblaca, and on the Lampeter Road.

There are no additional point source emissions of odour from the Installation as a result of the proposed changes, and the operator has confirmed that the risk of odour to nearby receptors from this variation to be low. We agree with this assessment. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of odour.

Condition 3.3.1 in the permit will require that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the operator for minimising odour at the installation.

10.6. Noise and vibration assessment

There are sensitive receptors within the vicinity of the installation - local residents in Llanybydder, across the river in Altyblaca, and on the Lampeter Road. The operator has identified the following sources of noise in their environmental risk assessment:

- One electric powered steam boiler
- One air source heat pump
- One hot water boiler

The operator has submitted a Noise Management Plan (NMP) which details various measures to minimise and mitigate noise issues. The NMP has been incorporated into the operating techniques table (Table S1.2) in the permit.

The operator has stated that it is not anticipated that there will be any additional noise impact and it is unlikely that there will be any additional noise impact beyond the site boundary. Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of noise.

We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the activity means that there are no significant sources of vibration on site. Therefore, vibration does not need to be included in the management plan.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where not practicable to minimise the effects of noise and vibration.

Conditions 3.4.1 of the permit requires noise from the activities to be below that which could cause pollution outside the site. We are satisfied that this will be sufficiently protective in conjunction with the measures described by the operator for minimising noise at the installation.

10.7. Global warming potential

Emissions of carbon dioxide (CO₂) and other greenhouse gases differ from those of other pollutants in that, except at gross levels, they have no localised environmental impact. Their impact is at a global level and in terms of climate change.

Global Warming Potential (GWP100) emissions as carbon dioxide equivalents (CO₂e) have been estimated for the proposed facility by the operator in accordance the relevant guidance⁴. The operator has confirmed that the proposed changes will result in a significant reduction in the use of fossil fuels on site as the heat pump will be powered electrically. When the hot water boiler is not in operation the only remaining fossil fuel use on site would be via shunter & forklift operation. The reduction of fuel consumption forms part of the company's Environmental & Sustainability objectives. The operator confirms that switching to renewable electricity from a fossil fuel energy source will result in an additional reduction in carbon emissions of 577tCO₂e each year. We consider the calculated total impact on global warming acceptable.

11. Impact on National Site Network Sites, SSSIs and non-statutory sites

The operator has used the relevant screening distance criteria to identify relevant protected conservation sites which could be at risk from the proposal. The screening distance used was 2km. AQTAG 14 - Guidance on identifying 'relevance' for assessment under the Habitats Regulations for Environmental Permitting Regulations

⁴ [Assess the impact of air emissions on global warming - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/assess-the-impact-of-air-emissions-on-global-warming)

(EPR) installations with combustion processes confirms that 1km is the relevant screening distance to be used.

A full assessment of the variation application and its potential to affect the identified sites identified has been carried out as part of the permit determination process. National Site Network sites, Sites of Special Scientific Interest (SSSI) and non-statutory conservation sites will be discussed separately below.

11.1 The National Site Network

The Site Network site are located within 1 km of the installation:

- Afon Teifi

A Habitat Regulations Assessment (HRA) was completed to assess the potential to affect any of the sites identified. In light of the conclusions of an appropriate assessment and taking account of the advice received from NRW's protected sites advisors, it has been established that the project will not adversely affect the integrity of any National Site Network site, taking into account any conditions or restrictions as applicable, either alone or in-combination with other plans and projects (as documented in section 4 of OGN 200 Form 1, and section 5 if applicable). The full assessment is available to view on the public register

11.2 Sites of Special Scientific Interest (SSSI)

The following Sites of Special Scientific Interest (SSSI) are located within 1 km of the installation:

- Afon Teifi

As a Section 28G Authority as defined in the Countryside Rights of Way Act 2000 permitting teams within NRW has a legal duty, under Section 28I of the Wildlife and Countryside Act 1981, to consult with NRW for formal advice when permitting an activity which has been determined to be likely to damage the features of a SSSI.

To determine if consultation is required, a SSSI Assessment was completed. The assessment concluded that the proposed permission is not likely to damage any of the flora, fauna or geological or physiological features which are of special interest. Advice

was sought from NRW's protected sites advisors but there were no comments on the assessment were received within 28 days. A copy of the assessment is available to view on the public register.

11.3 Non-statutory conservation sites

The following relevant non-statutory sites are located within 1 km of the installation:

- 4 Ancient semi natural woodland 4716,4831,4715,4632
- 2 plantation on ancient woodland 39120,38933
- 11 restored ancient semi natural woodland – 4674,5012,5380,4859,5027

As per Section 11.1 and 11.2. above, which confirms that in light of the conclusions of an appropriate assessment and taking account of the advice received from NRW's protected sites advisors, it has been established that the project will not adversely affect the integrity of any National Site Network site, we can also confirm therefore that the project will not adversely affect the integrity of any non-statutory conservation sites.

Based upon the information in the application we are satisfied that there will be no evidence of adverse impact to the non-statutory conservation sites identified.

12. The Permit Conditions

We have incorporated a number of new conditions specific to Medium Combustion Plants into the permit. These conditions have been taken from our MCP permit template.

12.1 Incorporating the variation

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including additional information received as part of the determination process. These descriptions have been specified in the Operating Techniques table in the permit. As the new hot water boiler is an MCP, the site must adhere to a number of additional operating techniques, these have also been specified in the Operating Techniques table in the permit. We have specified that the operator must operate the permit in accordance with descriptions in the application.

12.2 Emission Limits

We have decided that emission limits should be set for the parameters listed in the permit. Emission limit values for the new hot water boiler are in line with those contained within the Medium Combustion Plant Directive (MCPD).

Based upon the information in the application and the measures that will be imposed by the permit we are satisfied that the appropriate measures will be in place to protect air quality for the environment and human health.

12.3 Monitoring

We have decided that monitoring should be carried out for the parameters listed in Schedule 3 of the permit using the methods and to the frequencies specified in those tables.

These monitoring requirements have been imposed in order to demonstrate compliance with the emissions limit values (ELV) in the permit, as per the ELV and monitoring frequency requirements specified within the MCPD.

For this new Medium Combustion Plant, that is an engine fuelled on gas oil, the monitoring requirements are as follows:

Pollutant	Type of combustion plant	Fuel Type	Emission Limit Value (mg/Nm ³)	Monitoring Required
NO _x	Hot water boiler (New medium combustion plants other than engines and gas turbines)	Gas oil	200	Within 4 months of the start of operations and then every three years
CO	Hot water boiler (New medium combustion plants other than engines and gas turbines)	Gas oil	No limits set	Within 4 months of the start of operations and then every three years

Emission limit values are defined at a temperature of 273.15 K, a pressure of 101.3 kPa and after correction for the water vapour content of the waste gases and at a standardised O₂ content of 3% for liquid or gaseous fuels.

For emissions to air, the methods for periodic monitoring are in accordance with the Environment Agency's Monitoring stack emissions: low risk MCPs and specified generators.

Based on the information in the application and the requirements set in the conditions of the permit we are satisfied that the monitoring techniques, personnel and equipment employed by the Operator will have either MCERTS certification or MCERTS accreditation as appropriate. A condition has been added to the permit stating the first monitoring measurements will be carried out within four months of the issue date of the permit or the date when the MCP is first put into operation whichever is later.

12.4 Reporting

We have specified the reporting requirements in Schedule 4 of the Permit to ensure data is reported to enable timely review by Natural Resources Wales to ensure compliance with permit conditions and to monitor the efficiency of material use and waste recovery at the installation. We have updated the reporting requirements to include the new MCP.

12.5 Improvement conditions

Based on the information on the application, we consider that we need to impose improvement conditions. Details of the improvement conditions used can be found at Annex 1.

The inclusion of the improvement conditions has been discussed throughout the body of the text of this decision document however a consolidated list can be found in the Annex below for ease of reference.

13 OPRA

The OPRA score has not been changed as a result of this variation and remains as 85. This will form the basis for ongoing subsistence fee's.

ANNEX 1: Improvement Conditions

The following table for the improvement conditions has been included in the permit and the decision for their inclusion discussed in the body of the text of this document:

Table S1.3 Improvement programme requirements		
Reference	Requirement	Due Date
IC1	<p>Report to be submitted to NRW demonstrating that the containment systems and supply lines constructed on site meet CIRIA guidance C736 'Containment systems for the prevention of pollution' for the new white diesel storage tank and plant room. The report shall include but not be limited to:</p> <ul style="list-style-type: none">• A CIRIA risk assessment carried out by a suitably qualified engineer.• Outline where the containment measures have been linked to the sites Environment Management System (EMS) for the new white diesel storage tank, the new gasoil boiler, and the air source heat pump.• An updated drainage plan	Within 6 months on the of issue of variation V007, or before operation, whichever is sooner.
IC2	<p>Confirmation that the Operation Techniques are updated in line with the operator's Environmental Management System and risk assessment for the new white diesel storage tank, the new gas oil boiler, the new electric powered steam boiler and the new air source heat pump</p>	Within 6 months on the of issue of variation V007