

Mr. B. Williams  
Environmental Compliance Ltd  
Unit G1, The Willowford  
Main Avenue  
Treforest Industrial Estate  
Pontypridd  
Rhondda Cynon Taf  
CF37 5BF

**Our ref:** PAN-025906  
**Your ref:**

**Date:** 14 August 2025

Dear Mr. Williams

**We need more information about your application**

**Application reference:** EPR/WP3231NB/V006  
**Operator:** Dairy Partners (Cymru Wales) Ltd  
**Facility:** The Creamery, Aberarad, Newcastle Emlyn, Carmarthenshire, SA38 9DQ.

Thank you for your application received on 31 May 2024.

I need to ask you for some more information before I can decide whether it is duly made or not. The information required is summarised below:

**Application Form C2**

**Q6: Environmental Risk Assessment**

**Emissions to Air**

Section 5.2.2 of DPCW 01.04 EPTR Issue 1.pdf states that nitric acid is likely to be emitted from the new wet scrubber emission point A2. Please provide an assessment of predicted nutrient nitrogen and acid deposition for this pollutant for each of the ecological receptors (SAC, SSSIs and Ancient Woodlands) identified in DPCW 01.04 ERA Issue 1.pdf.

The first row of table 6 "Amenity Risk Assessment", in DPCW 01.04 ERA Issue 1.pdf states that:

"Detailed air quality modelling has been undertaken to predict the impacts associated with stack emissions from the new A2 stack from the CiP system".

Please confirm if this is the case as DPCW 01.04 H1 (Air) Issue 1.pdf only presents a one-page summary of the H1 screening tool output for predicted emissions to air associated with

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Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Adeilad y Goron, Parc Cathays, Caerdydd, CF10 3NQ  
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[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English

the new emission point A2. If detailed air quality has been undertaken, please provide the electronic modelling files and the associated air quality impact assessment report.

### Emissions to Water

Please provide an electronic copy of the Water Framework Directive Assessment "DPCW.01.04/ADM" as referenced on the variation tab of your submitted charge banding tool.

Please provide a detailed assessment of the proposed temperature increase of the discharge via thermal plume dispersal modelling. This is to be based on the proposed maximum discharge rate of 900 m<sup>3</sup>/day and should compare the current effluent temperature of 21°C with the proposed temperature of 25°C.

Please read the criteria for the application potentially being a substantial variation based on the proposed increase of the effluent temperature. The topic of heat is presented in section A13 of our [RGN 8 guidance on "Substantial changes in operation at installations, mining waste facilities and other facilities involving solvent and combustion"](#). Please provide written justification to confirm if the proposed increase in effluent temperature from 21°C to 25°C meets the criteria for the application to be a substantial variation or not. Please note that the Surface Waters (Fishlife) (Classification) (England and Wales) Regulations 1997 referenced in section A13 have now been superseded. Therefore, you should use the updated legislation - The Water Framework Directive (Standards and Classification) (Directions) (England and Wales) 2015 as the basis for the assessment.

### Odour

Please provide an updated version of Table 6 "Amenity Risk Assessment" in DPCW 01.04.ERA Issue 1.pdf to include an assessment of the likelihood of detectable odour associated with emissions from the new CIP wet scrubber and associated emission point A2.

### Environmental Accident Management Plan

The Environmental Accident Management Plan submitted as Appendix 1 to DPCW 01.04 ERA Issue 1.pdf is dated 2021 in the document footer and Section 3 "Identification of Hazards" does not appear to reflect the new storage quantities and arrangements for the CIP chemicals. Please resubmit an updated version of this plan to show the new storage tank volumes for each CIP chemical and amend the rest of the plan to account for any change to the risks and mitigations necessary as a result of this physical change on site.

### Bunding and Containment

The document DPCW 01.04 EPTR Issue 1.pdf states in section 4.3.6 that:

"There are no changes to the quantity or type of chemicals used from the bulk CIP to the multi-use CIP, only the storage arrangements. Chemicals are stored in newly installed capacity tanks..."

Section 4.3.8 of the same document continues to state that:

"New storage tanks for the CIP system with integrated bunding is installed with the following capacities:

Caustic tank = 24,000L  
Acid tank = 24,000L  
Pre-rinse tank = 24,000L  
Fresh water tank = 45,000L  
Waste Water tank = 45,000L"

Given the proximity to the River Teifi (which is also a Special Area of Conservation), please provide an assessment of the above new tanks against the requirements of Ciria C736

“Containment Systems for the Prevention of Pollution” to demonstrate that all necessary safeguards and requirements are met to prevent pollution in the event of a loss of containment. The assessment shall also consider the potential risk of flooding inundation to the tanks from the river in extreme weather events and present a procedure for the inspection and removal of accumulated bund water under normal operating conditions.

### **Application Form C3**

#### **Q4b: Monitoring of point source emissions to air**

Please provide an assessment of the sampling point for emissions to air from the new CIP Wet Scrubber and associated emission point A2. The assessment should follow the methodology in our guidance [M1 “Sampling Requirements for Stack Emission Monitoring”](#)

#### **Q6b: Provide a breakdown of any changes to the energy your activities use and create**

Please can you confirm if Table 6 “Anticipated Energy Consumption” in the “Environmental Permitting Technical Requirements” (DPCW.01.04 EPTR Issue 1.pdf) document is complete. Footnote 1 to this table is not referenced in the Table itself, hence the request. Please provide a complete version of Table 6 “Anticipated Energy Consumption” if amendment is required.

#### **Q6e: Describe how you avoid producing waste in line with Council Directive 2008/98/EC on waste**

Please confirm if any liquid effluent is generated as a result of the operation of the proposed acid wet scrubber. If there is, please specify the intended disposal route for this effluent and the estimated quantity and frequency of disposal.

#### **Medium Combustion Plant (MCP) Regulation 61 (1) Notice**

We wrote to you on 28 July 2023 to explain we are required to vary your permit to ensure it reflects minimum standards and is compliant with Schedule 25A of EPR for the 2 x 5.33MWth Beel Industrial Boilers at the installation. We asked you to complete an Annex I MCPD spreadsheet, for the boilers which contains all the information we require for this task. You returned the completed spreadsheet on 28 July 2023. We are now able to include the MCP variation work, as part of the current permit variation application. However, in our letter of 28 July 2023, we explained that we are required to recover the cost of this particular variation. The current fee for this work based on our 2025/2026 charging scheme is a fixed fee of £1,675.

#### **Installation Design Capacity**

Section 2.2.2 of “DPCW.01.04 EPTR Issue 1.pdf” states:

“The maximum holding capacity is 1,000 tonnes of milk, maximum production throughput is 853 tonnes of milk per day. There is no change to the production capacity, throughput or treated effluent volumes as part of this application.”

However, the latest version of the permit for the installation (EPR/WP3231NB/V005) includes Improvement Condition IC17 relating to permitted capacity, which is the maximum capacity of the installation that was used in the most recent risk assessment submitted to Natural Resources Wales (NRW). A partial response to this improvement condition confirms that the last risk assessed (and therefore permitted) capacity was 720 tonnes of milk per day, with a maximum holding capacity of 698,867 litres of milk per day.

Given this apparent inconsistency, please confirm if the variation application will include a change to production capacity.

Please reply within 10 working days from the date of this letter. If we don't hear from you, we

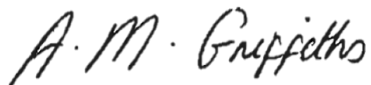
must return your application and fee.

If you email or write to us, please quote the application reference EPR/WP3231NB/V006 on any correspondence and send it to the relevant address below.

When we receive the missing items, we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application, we say the application is 'duly made' and we'll let you know this by letter.

Please quote our reference if you contact us. If you have any questions, please phone me on (03000) 654358 or email [anna.griffiths@naturalresourceswales.gov.uk](mailto:anna.griffiths@naturalresourceswales.gov.uk).

Yours sincerely

A handwritten signature in black ink that reads "A. M. Griffiths". The signature is written in a cursive style with a large initial 'A' and 'M'.

**Anna Griffiths**  
**Senior Specialist Advisor, Installations and RSR Permitting**