



**APPLICATION FOR AN ENVIRONMENTAL PERMIT
VARIATION UNDER THE ENVIRONMENTAL
PERMITTING (ENGLAND AND WALES)
REGULATIONS 2016 (AS AMENDED)**

ENVIRONMENTAL RISK ASSESSMENT



**DAIRY PARTNERS (CYMRU WALES) LIMITED,
THE CREAMERY, ABERARAD,
CASTELL NEWYDD EMLYN,
CAMARTHESHIRE, SA38 9DQ**

**ECL Ref: DPCW.01.09/ERA
Version: Issue 1
Date: June 2026**

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ACRONYMS/TERMS USED IN THIS REPORT

AW	Ancient Woodland
CCTV	Closed Circuit Television
CiP	Cleaning in Place
CO	Carbon Monoxide
DAA	Directly Associated Activities
DAF	Dissolved Air Floatation
DEFRA	Department for Environment, Food and Rural Affairs
DMW	Data Map Wales
DP	Dairy Partners
EA	Environment Agency
EAL	Environmental Assessment Level
ECL	Environmental Compliance Limited
ELV	Emission Limit Value
EPTR	Environmental Permitting Technical Requirements
EQS	Environmental Quality Standards
ERA	Environmental Risk Assessment
ETP	Effluent Treatment Plant
H ₂ O ₂	Hydrogen Peroxide
Ha	Hectares
HNO ₃	Nitric Acid
LNG	Liquid Natural Gas
LNR	Local Nature Reserve
LWS	Local Wildlife Site
MAGIC	Multi-Agency Geographical Information for the Countryside
MCERTS	Monitoring Certification Scheme
NaOH	Sodium Hydroxide
NGR	National Grid Reference
NNR	National Nature Reserve
NO _x	Nitrogen Oxides
NRW	Natural Resources Wales
PPMR	Planned Preventative Maintenance Regime
QHSE	Quality, Health, Safety and Environment
Ramsar	The Ramsar Convention on Wetlands of International Importance
SAC	Special Areas of Conservation
SPA	Special Protection Areas
SSSI	Sites of Special Scientific Interest
The Installation	The Creamery, Aberarad, Newcastle Emlyn, Carmarthenshire SA38 9DQ

1. INTRODUCTION

1.1. Overview

- 1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Dairy Partners (Cymru Wales) Limited (“DP”) to prepare an Environmental Risk Assessment (“ERA”) to form part of the Environmental Permit variation application at their dairy manufacturing facility (Environmental Permit (EPR/WP3231NB), hereafter referred to as “the Installation”, located at The Creamery, B4333 Road, Aber-Arad, Newcastle Emlyn, SA38 9DQ.
- 1.1.2. As part of DP’s ongoing site development programme, DP is proposing to procure and install two new above-ground stainless steel sludge storage tanks, each with a capacity of 32,000 litres, and a new pumping system, installation will commence once the permit variation application is approved. These tanks form part of the site’s long-term strategy to optimise sludge handling and align with evolving best practice.
- 1.1.3. As part of the variation, DP is proposing removal of point source emission W3, which is surface run-off (primarily hillside from adjacent properties that naturally run into the Installation conveyed via a legacy drainage route) following development of the Secondary Containment Lagoon Project (“SCL”).
- 1.1.4. An ERA has been undertaken in accordance with Natural Resources Wales (“NRW”) ‘*How to Comply with Your Environmental Compliance*’ (Version 8, October 2014) and the relevant requirements of the current version of the NRW online guidance¹, to:
- identify potential risks that site operations may present to the environment;
 - screen out any insignificant risks;
 - assess potentially significant risks in detail; and
 - decide on the appropriate control measures.
- 1.1.5. Accordingly, the assessment has addressed the potential risks relating to the operation of the Installation, namely:
- amenity risks (e.g. point source emissions to air and water, fugitive emissions to air and water, noise, odour etc.); and
 - accidents (e.g. fire, loss of containment, loss of power, vandalism).

¹ NRW online guidance – ‘*Risk assessments for your environmental permit*’. Available at <https://naturalresources.wales/permits-and-permissions/installations/how-to-carry-out-a-risk-assessment-for-an-environmental-permit/?lang=en>, accessed May 2026.

2. IDENTIFICATION OF RECEPTORS

2.1. Site Settings

- 2.1.1. The Installation is located on the B433 in Aber-Arad, within a residential and agricultural area to the south-east of Newcastle Emlyn. The Installation occupies an approximate area of 2.3ha and is centred on National Grid Reference (“NGR”) 231557 240184.
- 2.1.2. Figure 1 provides the indicative location of the Installation (red outline) within the context of the surrounding environment.

Figure 1: Indicative Site Location

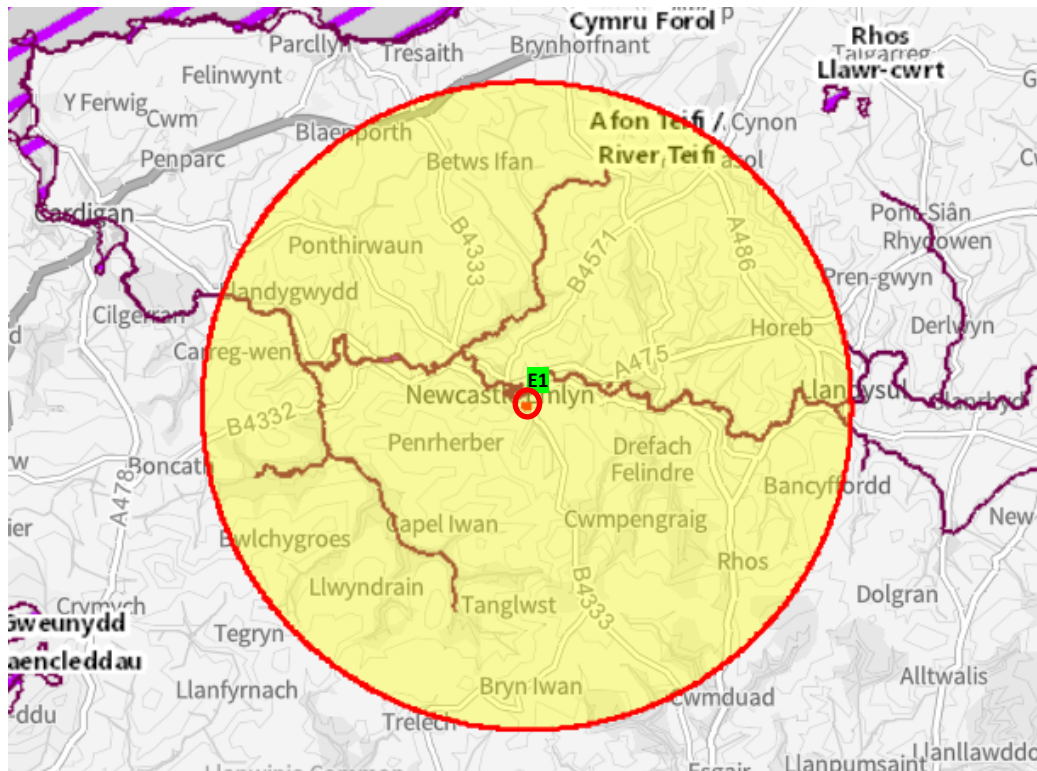


- 2.1.3. The immediate surroundings include residential property, commercial units and woodland. The nearest residential property in Aber-Arad is located immediately north-west, south-west and south-east of the Installation. The nearest residential property in Newcastle-Emlyn is located approximately 323m south-west of the Installation boundary.
- 2.1.4. The nearest commercial property is located approximately 10m west and 13m east of the of the Installation boundary. The main commercial area nearest to the Installation is the town centre of Newcastle-Emlyn, located approximately 808m west of the Installation boundary.
- 2.1.5. The River Arad is located immediately north-east of the Installation boundary and flows north to the of the River Teifi located approximately 268m north-west of the Installation boundary.

2.2. Potentially Sensitive Ecological Receptors

2.2.1. A review of the area using the Multi-Agency Geographic Information for the Countryside² (“MAGIC”) online tool identified that the Installation is located within 10km of the River Teifi (Afon Teifi), which is designated as a Special Area of Conservation (“SAC”) approximately 257m north from the Installation Permit boundary. No Special Protection Areas (“SPA”) or Ramsar Convention on Wetlands of International Importance (“Ramsar”) were identified within the ecological receptor search. The indicative locations of the identified ecological receptor are shown in Figure 2.

Figure 2: SAC identified within 10km of the Installation Boundary



Note to Figure 2:

Red inner circle – The Installation

Purple line – SAC

2.2.2. The NGR of the identified ecological receptors is listed in Table 1, together with their distance and direction from the Installation Permit boundary.

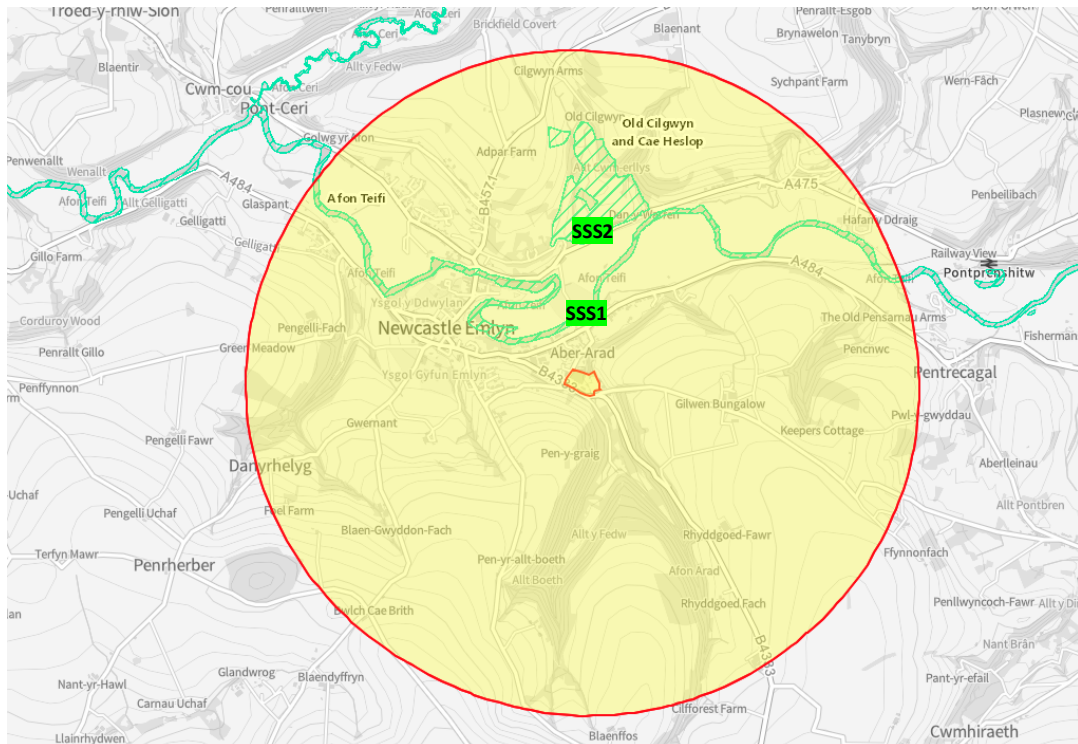
Table 1: SACs, SPA and Ramsar within 10km of the Installation Permit Boundary

Ref	Description	Designation	Easting	Northing	Distance from EP Boundary (km)	Direction
E1	Afon Teifi/River Teifi	SAC	231471	240518	0.26	N

² Department for Environment, Food and Rural Affairs (“DEFRA”) MAGIC Online Mapping Tool, available at: <https://magic.defra.gov.uk/magicmap.aspx>, accessed May 2026.

2.2.3. Two Sites of Special Scientific Interest (“SSSI”) are located within 2km of the Installation Permit boundary as shown in Figure 3. Details of the sites are displayed in Table 3.

Figure 3: SSSIs identified within 2km of the Installation Permit Boundary



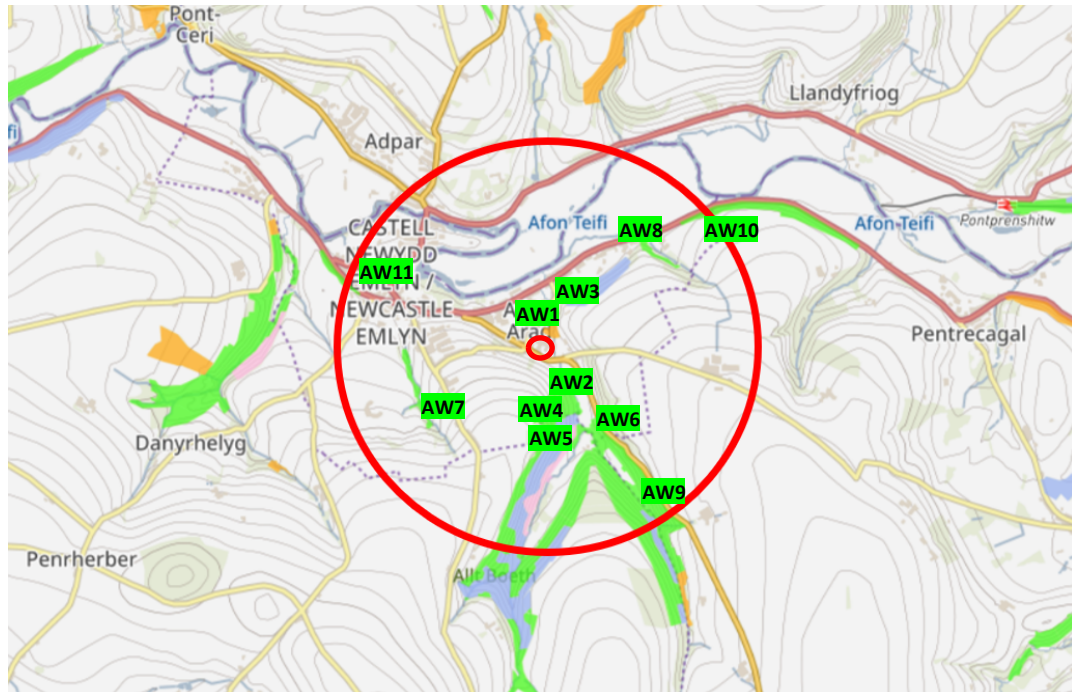
Note to Figure3:
 Red inner circle – The Installation
 Turquoise line - SSSI

Table 2: SSSI within 2km of the Installation Permit Boundary

Ref	Description	Easting	Northing	Distance from EP Boundary (km)	Direction
SSSI1	Afon Teifi/River Teifi	231471	240518	0.26	N
SSSI2	Old Cilgwyn and Cae Heslop	231534	241092	0.80	N

2.2.4. According to the DataMapWales³ (“DMW”), there are no National Nature Reserves (“NNRs”) or Local Nature Reserves (“LNR”) within 2km of the Installation boundary. However, eleven Ancient Woodland (“AW”) sites are situated within 1km of the Installation boundary as shown in Figure 4.

Figure 4: AW identified within 1km of the Installation Permit Boundary



Note to Figure 4:
 Inner red circle – The Installation
 Orange shading – Restored AW
 Blue shading- Plantation on AW site
 Green shading – Semi-natural AW
 Pink shading- AW site of Unknown category

2.2.5. The Installation is not located within 2km of any Local Wildlife Sites (“LWS”). According to Carmarthenshire County Council, these sites are yet to be designated as part of the Revised Local Development Plan 2018-2033.⁴

2.2.6. The NGR of the identified AW sites within 2km are listed in Table 3, together with their distance and direction from the Installation’s Permit boundary.

³ DataMapWales Map Viewer, available at: <https://datamap.gov.wales/maps/new#/>, accessed May 2026.

⁴ Draft Supplementary Planning Guidance: Methodology for Determining SINC in Carmarthenshire available at: <https://democratiaeth.sirgar.llyw.cymru/documents/s80562/=1>, published October 2023, accessed May 2026.

Table 3: AW Within 1km of the Installation Permit Boundary

Ref	Description	Easting	Northing	Distance from EP Boundary (km)	Direction
AW1	Restored AW Site	231579	240233	0	NE
AW2	Semi-Natural AW	231657	239946	0.13	S
AW3	Plantation on AW Site	231662	240372	0.18	NE
AW4	Plantation on AW Site	231722	239780	0.32	S
AW5	AW Site of Unknown Category	231728	239702	0.36	S
AW6	Semi-Natural AW	231868	239831	0.38	S
AW7	Semi-Natural AW	230944	239755	0.63	SW
AW8	Semi-Natural AW	232106	240703	0.68	NE
AW9	Plantation on AW Site	232123	239288	0.93	S
AW10	Semi-Natural AW	232209	240774	0.94	NE
AW11	Semi-Natural AW	230523	240447	0.97	NW

2.2.7. Three Scheduled Monument sites are located within a 1km radius of the Installation. These sites are detailed in Table 4.

Table 4: Scheduled Monuments Within 1km of the Installation Permit Boundary

Ref	Description	Easting	Northing	Distance from EP Boundary (km)	Direction
SM1	Newcastle Emlyn Castle	231141	240720	0.50	NW

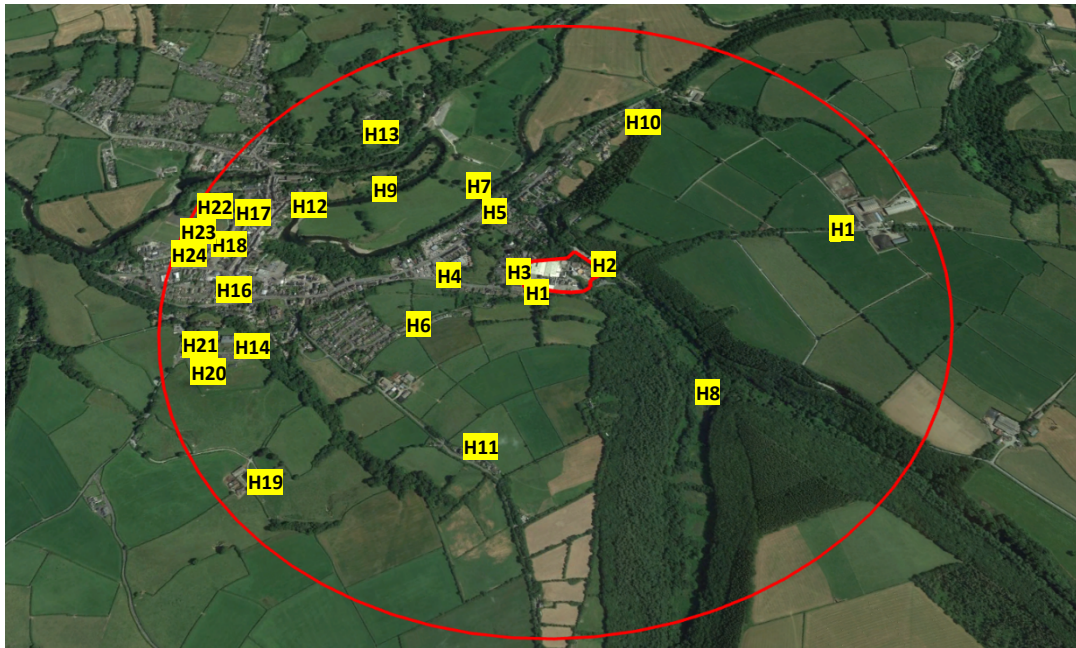
2.2.8. In addition to the SACs, SPAs, Ramsar, SSSIs, NNRs, LNRs, LWS, AW and Scheduled Monuments, other potentially sensitive land uses within 1km of the Installation were also considered. A review of the area using the MAGIC tool and DMW indicated that none of the following sensitive land uses are located within a 1km radius of the Installation:

- Areas of Outstanding Natural Beauty;
- Groundwater Source Protection Zones;
- Marine Conservation Zones;
- National Parks; and/or
- Nitrate Vulnerability Zone.

2.3. Potentially Sensitive Human Receptors

2.3.1. Twenty-four potentially sensitive human receptors have been identified within 1km of the Installation, which are displayed in Figure 5 and outlined in Table 5.

Figure 5: Sensitive Human Receptors Identified within 1km of the Installation



Note to Figure 5:
 Inner red boundary – The Installation
 Outer red circle – 1km search radius

Table 5: Human Receptors within 1km of the Installation Permit Boundary

Ref	Name	Receptor Type	Easting	Northing	Distance from Permit Boundary (km)	Direction
H1	Residential property Aber- Arad	Residential	231475	240160	0.00	SW
H2	Chadzy's	Commercial	231683	240143	0.00	E
H3	Telemat IT Support	Commercial	231466	240213	0.01	W
H4	CK's Supermarket	Industrial/ Commercial	231283	240287	0.20	W
H5	Melin Pandy B&B	Commercial/ Residential	231530	240504	0.28	N
H6	Residential Property Newcastle Emyln	Residential	231142	240149	0.33	W
H7	Newcastle Emyln RFC	Recreational	231470	240585	0.34	N
H8	Residential Property	Residential	231789	239631	0.49	SE
H9	Newcastle Emyln Castle	Recreational	231155	240676	0.56	NW

Table 5: Human Receptors within 1km of the Installation Permit Boundary (Cont.)

Ref	Name	Receptor Type	Easting	Northing	Distance from Permit Boundary (km)	Direction
H10	Roseberry House	Commercial/ Residential	232005	240675	0.57	N
H11	Scrapbox Quilting and Penlon Road Residences	Commercial/ Residential	231166	239689	0.57	S
H12	Our Lady Queen of Peace Catholic Church	Religious	230995	240740	0.70	NW
H13	Helen Elliot Art of Wales Visitors Centre	Recreational	231256	240945	0.74	NW
H14	Ysgol Gyfun Emlyn	Educational	230718	240211	0.75	W
H15	Gilwen Farm	Agricultural/ Residential	232448	240046	0.80	E
H16	Newcastle Emlyn Town Centre	Commercial/ Residential	230717	240487	0.81	W
H17	Holy Trinity Church	Religious	230799	240766	0.86	NW
H18	King George V Playing Fields	Recreational	230727	240649	0.87	W
H19	Farm Property	Agricultural/ Residential	230663	239808	0.88	SW
H20	Newcastle Emlyn Swimming Pool	Recreational	230577	240190	0.88	W
H21	Newcastle Emlyn Leisure Centre	Recreational	230590	240304	0.89	W
H22	Maes Llewellyn Assisted Living	Residential	230721	240786	0.94	NW
H23	Emlyn Dental Care	Medical	230772	240836	0.94	NW
H24	Newcastle Emlyn Football Club	Recreational	230654	240682	0.95	W

2.4. Risk of Flooding

- 2.4.1. As shown on the NRW Long Term Flood Risk Map⁵ provided in Figure 6, the eastern area of the Installation is predominantly high risk from flooding from rivers, which is defined by NRW as having an annual risk of flooding greater than 3.3%. The western area of the Installation is at very low risk from rivers, defined by NRW as having an annual risk of flooding less than 0.1%. The Installation has no risk of flooding from seas.

Figure 6: Long Term Flood Risk Map – Rivers and Seas



⁵ NRW Long Term Flood Risk Maps, available at: <https://naturalresources.wales/evidence-and-data/maps/long-term-flood-risk/?lang=en>, accessed March 2026.

2.4.2. As shown in Figure 7, the Installation is categorised as being at very low risk (<0.1%) of flooding from surface water and small watercourse flooding annually.

Figure 7: Long Term Flood Risk Map – Surface Water and Small Watercourses⁵



3. IDENTIFICATION OF THE RISKS

3.1. Amenity Risks

3.1.1. Considering the nature of the activities that are proposed as part of this variation at the Installation, the main amenity risks identified are as follows:

- fugitive emissions to air;
- point source emissions to surface water;
- fugitive emissions to surface water;
- noise;
- odour; and
- general amenity risks.

3.1.2. The replacement of the existing sludge storage arrangement and installation/commissioning of the new system may temporarily involve activities with potential for short-duration odour release (e.g. tank emptying, cleaning, removal and pipework modifications), although these are expected to be minor and controlled.

3.1.3. Other than that, the activities do not involve any point source emissions to air or land i.e. process contributions, therefore no further assessments have been undertaken.

3.1.4. Fugitive releases to land and groundwater will be prevented by conducting all operations in areas sealed with an impervious barrier to prevent a pathway for migration to land and groundwater. Consequently, no further assessment has been undertaken.

3.2. Accident Risks

3.2.1. The main potential accident risks have been identified as:

- fire;
- loss of power/system failure;
- loss of containment of potentially polluting materials;
- vandalism; and
- flooding.

4. ASSESSMENT OF RISKS

4.1. Methodology

4.1.1. The updated risk assessments have been undertaken using the following approach for amenity and accident risks specifically with the variation changes as part of this application:

- identification of hazards associated with the risk that have the potential to cause harm;
- identification of potential receptors i.e. what is at risk? (for the purposes of this assessment, typical potential receptors have been identified);
- pathway i.e. how can the hazard get to the receptor;
- risk management measures employed to reduce the risk to an acceptable level;
- probability of exposure i.e. how likely is this contact;
- consequence i.e. what is the harm that can be cause? and;
- assessment of overall risk.

4.1.2. The assessments for the amenity and accident risks identified above are presented in Tables 6 and 7 respectively.

Table 6: Amenity Risk Assessment

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Emissions to Air						
<i>Fugitive Emissions to Air</i>						
Fugitive emissions from the new stainless steel sludge tanks	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air – windblown dispersion in atmosphere.	<p>The installation of the new stainless steel sludge tanks will be in accordance with the manufacturer’s instructions.</p> <p>Servicing of the sludge tank system and maintenance of the tanks along with the carbon filter system, new associated pipework and Roto M561 progressive capacity pump sludge transfer system will be undertaken as part of the documented planned maintenance schedule, which includes all plant and processing equipment. This will ensure optimal performance and to instigate any changes if deemed necessary.</p> <p>Of note, both tanks will be fitted with carbon filtration units on all breather and vent lines. All transfer lines will be stainless steel, due to it being a non-porous surface, it does not harbour odour-causing microbes and therefore allows for highly effective cleaning and stopping persistent smells from accumulation over time in comparison to plastic or concrete tanks.</p>	<p>Low</p> <p>Risk management measures should prevent unauthorised releases from reaching the identified receptors</p>	Air pollution and potential health consequences.	Not significant if risk management measures are strictly adhered to and implemented as part of the updated Odour Management Plan to reduce odour release and minimize the likelihood of detection and associated nuisance

Table 6: Amenity Risk Assessment (Cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Emissions to Water						
<i>Point Source Emissions to Water – Surface Water</i>						
Point source emissions to surface water run-off from SCL area.	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Via W3 into Afon Arad/Afon Teifi.	<p>The proposed removal of the uncontaminated surface run-off pipework, that comes onto site from the adjacent land higher up under the sludge tank location and into the river via outlet W3 has been blocked off already, but official decommissioning will be part of this permit variation application.</p> <p>The decommissioning work shall be carried out as part of the Secondary Containment Lagoon project and completed by fully competent contracted engineering staff and maintained in accordance with the planned schedule of works.</p> <p>The sludge tanks will also be located within the new Secondary Containment Lagoon area, which means sludge delivery is isolated from the surface water drainage system and will be installed within new bunds acting as additional control for any potential of accidental release to surface water.</p> <p>Any spillages will be dealt with in accordance with the Dairy Partners spill procedure. Updates will be implemented to the spill response procedure (Spill Response Plan and Incident Response Investigation Report) once permit variation application is determined.</p>	Low	Contamination of surface water.	Not significant if risk management measures are strictly adhered to

Table 6: Amenity Risk Assessment (Cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
General Amenity Risk - Noise						
Noise emissions from proposed sludge tank operations	Ecological and human sensitive receptors in surrounding area (see Section 2.2 and 2.3 of this ERA).	Release to Air. Installation is close enough to human sensitive receptors for noise to be potentially audible.	<p>Use of the sludge tanks and transfer shall be operated and maintained by trained personnel in accordance with the documented planned maintenance schedule or condition monitoring system, which includes all plant and processing equipment and is maintained by the Engineering Preventative Maintenance Coordinator. This ensures all equipment is in optimal operational condition. Standby pumps and key parts will allow maintenance to be executed during suitable hours while operations can continue during the day.</p> <p>The proposed new progressive cavity pump will be positioned directly in front of the proposed sludge tanks and have been chosen based on noise and vibration as a key factor. The system offers a starting torque of 40 Nm, with a discharge potential of up to 17 m³/hr, dependent on operating pressure; low-pulsation pumping reduces wear on fittings and supports long-term reliability</p> <p>As part of this variation, amendments to the Noise Implementation Plan and updates to the Noise Management Plan will also detail the noise arrangement and management, which can be found in Appendix VI of the Environmental Permitting Technical Requirements (“EPTR”) (Document reference DPCW.01.09/EPTR). Staff and contractors are trained to identify any abnormal noise levels. An investigation will be undertaken to establish the root cause and implement corrective actions. The relevant risk assessment will also be updated where necessary.</p>	Low. The risk management measures should prevent noise reaching the identified receptors	Possible noise nuisance.	Not significant if risk management measures are strictly adhered to

Table 6: Amenity Risk Assessment (Cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
General Amenity Risks -Odour						
Odour from the sludge tanks and transfer	Human population in surrounding area (see Section 2.3 of this ERA)	Via air Installation is close enough to human sensitive receptors for odour to be a nuisance	<p>Odour from Sludge Tank Transfer operations will be mitigated as the proposed stainless-steel tanks and associated pipework for all inlets, outlets, and breather connections are also stainless steel. All lids of equipment will remain closed when not in use.</p> <p>During sludge transfer, the proposed new progressive cavity pump will be positioned directly in front of the proposed sludge tanks.</p> <p>Of note, both tanks will be fitted with carbon filtration units on all breather and vent lines. All transfer lines will be stainless steel, due to it being a non-porous surface, it does not harbour odour-causing microbes and therefore allows for highly effective cleaning and stopping persistent smells from accumulation over time in comparison to plastic or concrete tanks.</p> <p>A robust complaints procedure is in place to ensure any nuisance is dealt with. All staff and contractors are trained to identify any abnormal odour levels.</p> <p>Odour Risk Assessments have been updated (see DPCW.01.09/EPTR – Appendix VII) and updates to the OMP will be carried out once permit variation has been issued and tanks are installed.</p>	Low The risk management measures should prevent pests reaching identified receptors	Possible adverse health effects and nuisance.	Not significant if risk management measures are strictly adhered to and implemented as part of the Odour Management Plan (OMP) to reduce odour release and minimise the likelihood of detection and associated odour risk

Table 7: Accident Risk Assessment

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Spillage of Potentially Polluting Substances – Sludge Storage and Transfer						
Loss of containment during storage and transfer of potentially polluting substances.	Local Watercourse Network	Via site drainage network or overland flow.	<p>All potentially polluting liquids will be appropriately banded providing a minimum capacity of either 110% of the capacity of the largest storage vessel or 25% of the total capacity of all the storage vessels within the bund, whichever is greater.</p> <p>DP have installed an appropriate isolation system to prevent any uncontrolled releases to surface water.</p> <p>Barriers and signage will be in place to prevent the risk of vehicle collision with storage vessels and bunding.</p> <p>Regular site inspections are undertaken to observe any spillages and to inspect bund integrity. Any remedial action required is recorded in the Incident Log.</p> <p>Loss of containment will be dealt with in accordance with the Installation’s spill response procedure (Spill Response Plan and Incident Response Investigation Report) which is contained in Appendix II and III of this report.</p> <p>All employees are suitably trained in the procedure, and spill kits are strategically located throughout the Installation.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	<p>Contamination/pH imbalance of Effluent Treatment Plant and/or contamination of controlled waters.</p>	<p>Not significant if risk management measures are strictly adhered to</p>

Table 7: Accident Risk Assessment (Cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Loss of Power						
Major system failure/loss of process control	Local Watercourse Network	Via site drainage network or overland flow.	<p>DP personnel are always present to supervise operations. The process equipment benefits from alarms and controls which enable any malfunctions to be identified immediately. Additionally, emergency stop buttons can halt the process immediately in case of serious failure or faults occurring. The Installation can identify, holding and preventing the release of any materials should equipment fail.</p> <p>The documented planned maintenance schedule or condition monitoring system details the required maintenance and inspection of all process equipment to ensure good working order to reduce the risk of complete system failure.</p> <p>If major system failure or loss of power occurs, all affected operations will be halted, faults will be addressed, and repairs undertaken where necessary using specialist contractors. Competent personnel will then check all areas prior to recommencing operations.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Contamination/pH imbalance of ETP and/or contamination of controlled waters.	Not significant if risk management measures are strictly adhered to
Vandalism						
Any of the above.	Any of the above.	Any of the above.	<p>The Installation implements a Security Policy as part of the EMS. The Installation is secured by perimeter fencing and remote closed-circuit television (“CCTV”) monitoring system surveys all areas of the Installation, including the Secondary Containment Lagoon area, the proposed new sludge tanks and, associated pipework with new cavity pump for sludge transfer.</p> <p>Security systems are in place to ensure that products, premises, and brands are protected from malicious actions. DP undertake an annual document assessment review at the Installation which includes site security and is collated into a Threat Assessment Plan. Identified actions and control measures to reduce risks are implemented.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Any of the above.	Not significant if risk management measures are strictly adhered to

Table 7: Accident Risk Assessment (Cont.)

Hazard	Receptors	Pathway	Risk Management	Probability of Exposure	Consequence	Overall Risk
Vandalism (Cont.)						
Any of the above.	Any of the above.	Any of the above.	<p>All external storage tanks, silos and intake pipes with an external opening are secure through lock or restricted access.</p> <p>Staff are trained in site security procedures and are encouraged to report unidentified or unknown visitors.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	Any of the above.	Not significant if risk management measures are strictly adhered to
Flooding						
Flooding of the Installation	Human and ecological sensitive receptors population in surrounding area (see Section 2.2 and 2.3 of this ERA)	Overland flow / Flood Waters	<p>All activities are managed and operated in accordance with the management system, management plans and procedures implemented.</p> <p>All equipment has been designed to be above the flood levels in accordance with the flood risk assessment completed.</p> <p>Sludge tanks and associated pipework are in a location of high risk for flooding, therefore the SCL project and secondary containment will reduce the risk of flooding associated with their location.</p>	<p>Low</p> <p>Risk management measures should prevent any release from reaching the identified receptors</p>	<p>Damage of equipment and materials</p> <p>Waste washed off-site contaminating ecological and human receptors</p>	Not significant if risk management measures are strictly adhered to

5. SUMMARY

5.1. Results of the Assessment

5.1.1. The results of both the amenity and accident risk assessments (Tables 6 and 7) indicate that none of the risks relating to proposed variation will be significant if the Installation is operated and managed in accordance with the risk management measures detailed and the Installation's Environmental Management System.

5.2. Conclusion

5.2.1. The risks in terms of accident and amenity risk can be considered not significant providing all risk management measures are implemented and strictly adhered to.

APPENDIX I

ENVIRONMENTAL ACCIDENT MANAGEMENT PLAN

APPENDIX II

INCIDENT RESPONSE INVESTIGATION REPORT

APPENDIX III

SPILL RESPONSE PLAN