



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

NON-TECHNICAL SUMMARY



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

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ACRONYMS / TERMS USED IN THIS REPORT

BAT	Best Available Techniques
BREF	Best Available Techniques Reference Document
CCA	Climate Change Agreement
Cd	Cadmium
CiP	Cleaning in Place
CO₂	Carbon Dioxide
DAA	Directly Associated Activity
DP	Dairy Partner (Cymru Wales) Limited
EAL	Environmental Assessment Level
ECL	Environmental Compliance Limited
EMS	Environmental Management System
EP Regulations	Environmental Permitting (England and Wales) Regulations 2016 as amended
EPTR	Environmental Permitting Technical Requirements Document
ERA	Environmental Risk Assessment
ETP	Effluent Treatment Plant
H₂SO₄	Sulphuric Acid
H₃PO₄	Phosphoric Acid
LNG	Liquid Natural Gas
NaOH	Sodium Hydroxide
NGR	National Grid Reference
NO	Nitrogen Oxide
NO₂	Nitrogen Dioxide
NRW	Natural Resources Wales
NTS	Non-Technical Summary
SCR	Application Site Condition Report
The Installation	Area contained within the proposed Environmental Permit boundary at DP (Cymru Wales) Limited
VSD	Variable Speed Driver

1. INTRODUCTION

- 1.1.1. Environmental Compliance Limited (“ECL”) has been commissioned by Dairy Partners (Cymru Wales) Limited (“DP”) to prepare an Environmental Permit Variation Application for their dairy manufacturing facility (Environmental Permit (EPR/WP3231NB), hereafter referred to as “the Installation” located at The Creamery, B4333 Road, Aberarad, Newcastle Emlyn, SA38 9DQ (“the Site”).
- 1.1.2. The Creamery in Aberarad manufactures mozzarella block products from milk, a large proportion of which comes from local dairy farms in Wales. The installation processes more than 850 tonnes of milk received per day.
- 1.1.3. As part of DP’s ongoing Installation development programme, DP is proposing to install two new above-ground stainless steel sludge storage tanks, each with a capacity of 32,000 litres, and a new pumping system. These improvements are scheduled for installation in 2027 if this permit variation application is approved. These tanks form part of the Installation’s long-term strategy to optimise sludge handling and align with evolving best practice.
- 1.1.4. There are two emission points to surface water of uncontaminated surface run-off to the Afon Arad, denoted as W2 and W3.
- 1.1.5. 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”) Project.
- 1.1.6. The installation is located on B433 in Aberarad south-east of Newcastle Emlyn, the surrounding areas are predominantly rural farmland and residential properties. The closest residential receptors are located adjacent to the south, east and northwestern side of the installation boundary. The Installation occupies an approximate area of 2.3ha and is centred on National Grid Reference (“NGR”) 231557 240184. The proposed Environmental Permit boundary is shown on Figure 1 below.

Figure 1: Indicative Site Location



2. ACTIVITIES

2.1. The listed activity currently undertaken at the Installation is covered by the description Section 6.8A1(e) and Section 5.4 A1(a)(i) in Part 1 to Schedule 1 of the Environmental Permitting (England and Wales) Regulations 2016 as amended (“EP Regulations”). These activities are the treatment and processing of milk and the treatment of process effluent arising from those activities respectively.

2.1.1. An Environmental Permit variation application is required to propose the following changes at the Installation:

- Installation of the new sludge stainless steel tanks;
- installation of the carbon filtration units on all breather and vent lines;
- installation of the progressive cavity pump;
- implementation of robust control measures for the interim position, whilst permit variation would be determined;
- relevant NRW guidance; and
- Best Available Techniques Reference Documents (“BREFs”) to be considered.

3. MANAGEMENT TECHNIQUES

- 3.1.1. DP operate an environmental management system (“EMS”), which although is not externally certified to ISO 14001, has been developed to be in keeping with ISO 14001 standard for environmental management, and in its completed format will be a system auditable to ISO 14001.
- 3.1.2. The Operations Manager has overall responsibility for environmental matters at the Installation.
- 3.1.3. The system is made up of several internal procedures with the aim of creating a process that ensures good environmental performance and prevents environmental damage caused by normal and abnormal operations of the plant.
- 3.1.4. Dairy Partners has established a documented management system which:
- ensures compliance with all relevant legislation;
 - ensures compliance with the Installation’s Environmental Permit;
 - identifies, assesses and minimises the risks of pollution arising from the Installation’s activities;
 - comprises a range of written procedures that cover all aspects of the Installation’s activities;
 - identifies, sets, monitors and reviews environmental objectives and key performance indicators; and
 - includes a requirement to report annually on environmental performance, objectives, targets, and future planned improvements.

4. OPERATING TECHNIQUES

4.1. Overview

- 4.1.1. The original Permit application detailed the description of the raw material and composition material of cow's milk products and cheese production effluent.
- 4.1.2. The maximum production throughput is 850 tonnes of milk per day. There is no change to the production capacity, throughput or treated effluent volumes as part of this application.
- 4.1.3. The Environmental Permit boundary is shown in Figure 2 with the approximate location of the sampling point, designated M1 and emission point to water, designated as W1.
- 4.1.4. W2 and W3 are un-contaminated water run-off outlets.

Figure 2: Emission Points Location



4.2. Technical Standards

- 4.2.1. The Industrial Emissions Directive (“IED”) and the Food, Drink and Milk Industries Best Available Techniques Reference Document (December 2019) will be considered as it covers installations associated with the production of milk and milk products for human consumption.
- 4.2.2. NRW implement the requirements of the IED via the EPR and have provided guidance documents to assist in the preparation of Environmental Permit applications and the ongoing management of permitted Installations. NRW’s *‘How to comply with your environmental permit’* (Version 8, October 2014) has been considered in this variation application.

4.3. Current Activities

Existing Sludge Tank Storage and Sludge Transfer

- 4.3.1. The existing polypropylene sludge tanks have reached the end of their serviceable life, with inspections in late 2025 identifying age related deterioration of roofs and hatches. The Operational Viability Risk Assessment demonstrated that the current tanks no longer provide the level of containment or environmental assurance required for ongoing compliant operation.
- 4.3.2. Consequently, to ensure long term environmental compliance, odour control reliability, and operational resilience, the operator proposes to replace the existing polypropylene tanks with new stainless steel sludge tanks, which is now being considered as part of this application.

Existing Emission Point to Surface Waters

- 4.3.3. W3 is uncontaminated surface run-off (primarily hillside from adjacent properties that naturally run into the Installation conveyed via a legacy drainage route). It is proposed that the decommissioning of outlet W3 and removal of the point source emission to water within the Permit forms part of this variation application.

4.4. Proposed Activities

New Storage and Transfer System Improvements

- 4.4.1. The activities that will be varied as part of this variation applications are as follows:
- Planned Sludge Tank and Pump System replacement and upgrade; and
 - decommissioning of W3 outlet of uncontaminated surface run-off and removal of the point source W3 from the Permit.
- 4.4.2. The new tanks will:
- Provide improved structural integrity and longer asset life;
 - Reduce the risk of odour escape and uncontrolled emissions;
 - Enhance containment performance and environmental protection;
 - Align sludge storage with current best practice and compliance expectations; and
 - Remove reliance on interim control measures required for the existing tanks.

Tank and Pump Design

- 4.4.3. The new tanks will be constructed from stainless steel, incorporating:
- Conical bases for efficient discharge; and
 - Stainless steel pipework with carbon filtration units on all inlets, outlets, and breather connections.
- 4.4.4. The tanks are designed to provide dedicated storage for sludge generated by the Water treatment process via the DAF, which is then directed to the sludge storage tanks. This material will be collected and transported off- site by an approved waste contractor.
- 4.4.5. Sludge will be transferred via a Roto M561 progressive cavity pump, selected for its suitability with viscous products.
- 4.4.6. Odour and Emission controls will be detailed within the updated Noise Management Plan and Odour Management Plan and will reflect Best Available Techniques (“BAT”) for the control of emissions from enclosed sludge systems.

Emission Point to Surface Waters

- 4.4.7. It is proposed that W3 shall be removed as part of this permit variation application.
- 4.4.8. Due to the Installation’s wider Effluent Treatment Plant (“ETP”) secondary containment lagoon project, the improvements will remove the W3 pipework and will be served by new filter drains. The outlet itself has already been blocked off and evidenced to NRW.
- 4.4.9. There are no other changes to other point source emissions to water considered as part of this variation application

5. EMISSIONS

5.1. Point Source Emissions to Air – Current Arrangements

5.1.1. There is one emission point to air, designated as A1, associated with the operation of a natural gas fired boiler.

5.2. Point Source Emissions to Air – Proposed Arrangements

5.2.1. There are no changes with regards to the emission point to air as part of this proposed variation application.

5.3. Point Source Emissions to Water (other than Sewer) – Current Arrangements

5.3.1. There is a point source emission to surface water (W1) by means of the treated effluent from the ETP. The wastewater originates from the process, such as boiler blowdown, ingredient processing and from the packaging hall.

5.3.2. Uncontaminated surface runoff is also permitted to be discharged to the surface water drainage network (W2 and W3).

5.4. Point Source Emissions to Water (other than Sewer) – Proposed Arrangements

5.4.1. It is proposed that W3 shall be removed as part of this permit variation application.

5.4.2. Due to the Installation's wider Effluent Treatment Plant ("ETP") secondary containment lagoon project, the improvements will remove the W3 pipework and will be served by new filter drains. The outlet itself has already been blocked off and evidenced to NRW.

5.4.3. Installation containment lagoon plans have already been submitted and approved by NRW.

5.4.4. There are no other changes to other point source emissions to water considered as part of this variation application.

5.5. Point Source Emissions to Sewer

5.5.1. There are no point source emissions to sewer considered as part of this variation application.

5.6. Point Source Emissions to Land

5.6.1. There are no point source emissions to land considered as part of this variation application.

5.7. Fugitive Emissions to Air

- 5.7.1. Fugitive emissions to air with regards to this permit variation application have been considered and covered in the Environmental Risk Assessment document.
- 5.7.2. The installation of the new stainless steel sludge tanks will be in accordance with the manufacturer's instructions.
- 5.7.3. 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.
- 5.7.4. 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.

5.8. Fugitive Emissions to Surface Water, Sewer and Land

- 5.8.1. There are no fugitive releases to surface water, sewer or to land considered as part of this variation application.

6. GENERAL REQUIREMENTS

6.1. Emissions Management

- 6.1.1. The Environmental Risk Assessment has demonstrated that emissions of substances not controlled by emission limits (i.e. fugitive emissions) are not considered to be significant, consequently, an Emissions Management Plan is not required as part of this application.

6.2. Odour Management

- 6.2.1. The daily treated sludge is odorous in nature. Qualitative Risk Assessments have been undertaken for both the current and the proposed stainless-steel tanks and associated pipework for all inlets, outlets, and breather connections, which are also stainless steel. Further to this, an Odour Management Plan is in place and shall be updated accordingly to detail the new sludge tanks and transfer system, following completion of NRW's current OMP review.

6.3. Noise Management

- 6.3.1. The daily treated sludge transfer system has the potential to generate noise. Consequently, a preliminary Noise Impact Plan has been submitted as part of this application and updates to the current Noise Management Plan will be aligned with the NIP, following NRW Site Officer's completion of the current review. An updated BS4142 assessment will occur post-installation.

6.4. Pest Management

- 6.4.1. The pest management control measures are not part of this application.

6.5. Fire Management

- 6.5.1. The fire risk management measures are not part of this application.

7. APPLICATION SITE CONDITION REPORT

7.1. There is no change to the current Site Condition Report as part of this application.

8. MONITORING

8.1. Monitoring of Point Source Emissions to Air

8.1.1. There are no change to the current monitoring requirements as part of this application.

8.2. Monitoring of Point Source Emission to Surface Water

8.2.1. There are no changes to the monitoring requirements as part of this variation application.

8.3. Monitoring of Point Source Emissions to Sewer

8.3.1. There are no changes to the monitoring requirements as part of this variation application.

8.4. Monitoring of Point Source Emissions to Land

8.4.1. There are no changes to the monitoring requirements as part of this variation application.

8.5. Monitoring of Fugitive Emissions to Air

8.5.1. Any changes to the monitoring requirements as part of this variation application have been identified in the updated Odour Risk Assessments and will align with an updated OMP once issued and installed.

9. RESOURCE EFFICIENCY AND CLIMATE CHANGE

9.1. Energy Efficiency Measures

9.1.1. Several energy efficiency measures will be implemented at the Installation.

9.2. Energy Consumption

9.2.1. There are no considerations for further energy consumption reduction measures as part of this application, beyond what is already specified within the EMS, which is under constant review.

9.3. Climate Change Agreement

9.3.1. DP has entered into a Climate Change Agreement. This CCA demonstrates DP' commitment to reducing energy consumption and associated carbon dioxide ("CO₂") emissions.

9.4. Raw Material Justification

9.4.1. There are no changes in raw material usage nor change in chemicals.

9.5. Waste Minimisation

9.5.1. There are no considerations for further waste minimisation as part of this application, beyond what is already specified within the EMS, which is under constant review.

10. COMPLIANCE WITH BAT CONCLUSIONS

- 10.1.1. It is considered that the techniques that will be in use at the Installation will constitute Best Available Techniques (“BAT”) and will be appropriate and proportionate for the scale of the activities at the Installation and the risks that are posed to the environment by these activities.

- 10.1.2. The BAT Requirements for the Installation and proposed variation have been taken from the Best Available Techniques Reference Document (“BREF”) for Food, Drink and Milk Industries (December 2019). These BAT conclusions apply without prejudice to other relevant legislation, such as food safety.