

Natural Resources Wales permitting decisions

**Dunbia (UK)
Dunbia Cross Hands**

Decision Document

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Variation

The variation number is:

BU8002IT/V006

The applicant /operator is:

Dunbia (UK)

The Installation is located at:

Dunbia Cross Hands, Cross Hands Food Park, Cross Hands, Llanelli, SA14 6RF

We have decided to issue the variation for Dunbia Cross Hands 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.

Proposed changes

The variation is to replace and relocate the CO₂ and Oxygen tanks as part of an optimisation project. The CO₂ and Oxygen assist in the packaging of meat. The tanks were originally installed when the site was commissioned in 2004 and have become less efficient over time. Replacing the tanks provided an opportunity to increase the storage capacity of CO₂ and Oxygen to meet production volumes which have increased since the tanks were first commissioned. The replacement tanks will be installed adjacent to the existing tanks within the existing permit boundary.

The operator has assessed the energy requirements for this variation throughout the design and procurement stage. Through the operators current policies and procedures, measures will be taken to minimise energy consumption where possible. The site currently has an Environmental Management System which drives continued improvements in energy efficiency across the site.

As part of this variation a correction has been made to the emission point references in Table 2.2.1.2 and 2.2.1.3. Previously point A9 was described as a CO₂ cylinder and this has been corrected to be described as an Oxygen cylinder.

The applicant requested that the original permit and all subsequent variations were consolidated into a single document. We have decided not to do this as part of this

variation as the permit will be reviewed as part of the Food and Drink BREF review.
The permit will be consolidated following this review.

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 applicant's proposals.

Key issues of the decision

Receipt of application

An application was received on 25th November 2020. The application was 'Not Duly Made' on 17th February 2021 as the application fee was not paid and an emission point plan and authorisation for nominated person to sign the declaration were required. The applicant submitted the additional information and the application was 'Duly Made' on 9th March 2021. The applicant were asked to clarify the emission point reference points and description which was provided on 25th March 2021.

Confidential information

A claim for commercial or industrial confidentiality has not been made.

Consultation

No external consultations were carried out due to the nature of the variation in line with NRW guidance.

A copy of the Application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

The facility

The regulated facility is an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities.

- S6.8 A(1)(d) Treatment and processing, other than exclusively packaging, of the following raw materials, whether previously processed or unprocessed, intended for the production of food or feed (where the weight of the finished product excludes packaging) – (i) Only animal raw materials (other than milk only) with a finished production capacity greater than 75 tonnes per day.

The permit also includes the following Directly Associated Activities:

- Ancillary services;
- Effluent treatment plant;
- Surface water management; and

- Waste Storage

Legislation

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

All applicable European directives have been considered in the determination of the application.

Emissions to air

This variation does not change any of the emissions limits in the permit. The variation clarifies that emission point A9 is for the Oxygen tank and A8 and A10 are for the CO₂ tanks. There are no additional emissions limits associated with this variation.

We have modified Table 2.2.1.2 (Emission points to air) and Table 2.2.1.3 (Emission limits to air and monitoring) to reflect the correction of the emission point (A9).

The operator has agreed that the new conditions are acceptable.

Odour

The only emissions will be Oxygen and CO₂, therefore the risks of odour emissions causing nuisance are low. We are satisfied that the variation will not cause odour nuisance.

Noise

The replaced Oxygen and CO₂ tanks are positioned in the same location as the existing tanks, therefore the risks of noise emissions causing nuisance are low. The operator stated that the increased storage capacity will lead to a reduction in vehicle deliveries of Oxygen and CO₂ to the site. We are satisfied that the variation will not cause noise nuisance.

Operating techniques

There are no changes to any of the operating techniques as a result of this variation. The operating techniques from the previous permit variation have been carried over. The relevant guidance applicable to the site is:

- How to comply with your environmental permit: Additional guidance for the red meat processing (cattle, sheep and pigs) sector (EPR6.12); and
- Industrial Emissions Directive 2010/75/EU – Best available Techniques (BAT) conclusions for the food, drink and milk industries.

The original CO₂ tank (capacity: 10,300 litres) and O₂ tank (capacity: 6,030 litres) are being replaced with vacuum insulated storage tanks with a net capacity of 30,480 litres.

Environmental Management System

The applicant has an Environmental Management System that is certified to ISO 14001 and ISO 50001. We 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 the permit conditions.

Future Permit Review

The variation will not change any other conditions or limits from the previous permit. The updated BAT Reference document for the food, drink and milk industries was published in 2019. A permit review is therefore required, at which point the original permit and subsequent variations will be consolidated into a single document.

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