

Paul Williams

Permitting Service

Natural resources Wales

Cambria House

29 Newport Road

Cardiff

CF24 OTP

Your Reference: PAN-012504

19/08/2021

Dear Paul,

Please find the attached documents detailing further the information requested in your previous letter re. permit variation application PAN-012504.

For ease of navigation, I have quoted the points from your letter below and responded to each individually.

- 1. The variation application has been made in the name of Dunbia UK, company number 3382084, while the existing permit is in the name of Dunbia (Wales), company number 2490902. We can not process this without a separate application to transfer the permit. Please submit an application for transfer, along with appropriate fee and supporting documents, or re-submit the existing application forms as Dunbia Wales.*

An application for permit transfer has subsequently been submitted on 06<sup>th</sup> July 2021 ref. WPCC10922.

- 2. The supporting documents have identified potential for additional noise. It is also stated that "therefore Dunbia (Llanybydder) will complete a noise survey. This noise*

assessment will be completed by a qualified noise specialist to establish a current base level and determine if the proposed changes are likely to have an impact on the noise levels beyond the installation boundary.” It is also stated that the noise management plan will be updated. Please submit the noise management plan and the noise assessment.

A noise survey has been carried out and a report written by an external contractor in May 2021 which is attached to this letter titled “Dunbia Noise Report July 2021” along with the updated noise management plan that will take effect upon completion of the changes outlined in the variation application.

3. The supporting documents have identified the potential for additional odour. It also stated that the odour management plan will be updated. Please provide a copy of the updated odour management plan.

Additional potential odour sources have been identified but controls identified to mitigate potential odour emissions will ensure that odour emissions from the proposed change are not significant. The updated odour management plan that will take effect upon completion of the changes outlined in the variation application is attached to this letter.

4. The risk assessment identifies a number of factors on different rows for potential odours. It does not give a complete full assessment of odour and identify the locations of all changes to odour sources with reference to distances to sensitive receptors. (Examples include the re located animal by products trailers and the re-located balance tank). Please provide a more detailed odour risk assessment, giving all relevant information.

The odour risk assessment, found within the odour management plan, has been updated to give further detail on odour and the potential for disruption to local receptors. See Appendix 9 for specific detailed risk assessment.

5. The application describes additional and re-located storage tanks. Please supply details of the construction, and capacity of the bunding for these tanks with reference to containing any losses from the primary tanks.

Please find this information detailed in file "LLA-TANK21 Updated Tank Construction Detail" attached in this letter. Dunbia has followed the guidance on "Containment Systems for the Prevention of Pollution" as set out by CIRIA.

6. Please provide an assessment as to how the changed infrastructure and operations will meet the standards laid out in the industry Best Available Techniques. Note: we are aware that the Best Available Techniques are being reviewed and anticipate that they will be revised and published at some time in the future. We are requesting you show that your proposed changes will meet the existing published standard and not any draft unpublished standard.

Dunbia meets and applies the current Best Available Techniques (BAT) as industry standard across its operations. Dunbia is also aware of the upcoming revision and will make an assessment against the updated revision once published such that the then current BAT will be met.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Luke Healy', with a horizontal line drawn underneath it.

Luke Healy

Environmental Officer

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Cc. Paul Edwards  
Jack Fahey  
Victoria Kerr

Enc. Dunbia Noise Report July 2021

Updated Noise Management Plan

Updated Odour Management Plan (Including more detailed risk assessment)

LLA-TANK21 Updated Tank Construction Details