

Natural Resources Wales permitting decisions

Arla Foods Limited - Llandrynog Creamery Decision Document

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Permit Surrender

The application number is: **EPR/BP3630NH/S004**

The operator is: **Arla Foods Limited**

The installation is located at: **Llandrynog Creamery, Denbigh, Denbighshire, LL16 4HH**

We have decided to accept the surrender of the permit for **Llandrynog Creamery** operated by **Arla Foods Limited**.

The permit number is **EPR/BP3630NH**

We are satisfied that the necessary measures have been taken to avoid any pollution risk and to return the site to a satisfactory state.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements.

Purpose of this document

This decision document:

- explains how the operator's application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account

Confidential information

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

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on commercial confidentiality.

Extent of the surrender application

The operator has applied to surrender the permit in full.

Pollution risk

The site condition report submitted to NRW in support of the surrender application was referenced: 'Environmental Permit Surrender – Arla Llandyrnog, (Permit Ref BP3630NH)'. The report was completed by EHS Projects on behalf of the operator, Arla Foods Limited. NRW have reviewed the report in line with the principles contained within 'Regulatory Guidance Note, RGN 9: Surrender' and concluded that the information presented in the report indicates that the site is in a 'satisfactory state' and that there appears to have been no notable deterioration in soil and groundwater condition during the life of the permitted installation. On this basis, NRW have no concerns and have no objection to the surrender of the permit.

We are satisfied that the necessary measures have been taken to avoid a pollution risk resulting from the operation of the regulated facility. Arla Foods Limited operated the plant in accordance with the externally accredited ISO14001 Environment Management System and conditions contained within this permit. Measures were required by the permit to prevent pollution from the emissions of substances not controlled by emission limits.

We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state. The application included a site closure plan which has been reviewed by the regulatory compliance officer. The closure plan specifies a number of actions that will be completed during decommissioning in order to protect the environment.

The installation ceased production 15/07/18 and the site was fully decommissioned by 16/04/2021. All on-site assets have been drained, cleaned and decontaminated where necessary. Arla Foods Limited assets are being removed to other Arla sites, sale or in the case of obsolete items scrapped in accordance with the decommissioning plan. Analysis of general water quality parameter was carried out during the lifetime of the permit and suggested that the listed activities did not have an adverse effect on the sites main receptors.

As part of the operation of the site a formal management system was put in place with additional measures to control significant environmental aspects, which could lead to pollution incidents from the permitted activities. Measures used to protect land are bullet pointed below;

- Chemical storage and handling activities only took place in areas that have an impervious concrete floor and are bunded against loss to land or water;
- An inspection and maintenance program was put in place to cover the concrete raft making up the floor of the areas within the installation and was operated during the permitted period;
- Manufacturing tank integrity, damage to plant, corrosion to steelwork and associated works, tank farms, sumps and bunded areas were inspected to a schedule held on the company's maintenance system;
- Inspection schedules required examination of all individual concrete rafts for general surface condition, cracks, holes / depressions and were carried out to a planned schedule;
- Other containment items such as tanks, pipework, bunds etc. have also been maintained at regular intervals according to schedules held on the company's maintenance system.

Arla reported 1 Schedule 1 Notification of Abnormal Emissions in June 2010 following leakage of milk storage silo 8 resulting in the discharge of approximately 6,000 litre of milk to effluent drain. The spill, investigation and completion of all remedial works were notified to and consulted through to final sign off with the local EA inspector. No concerns remained with regard the incident impacting ground or groundwater.

There were no other Schedule 1 incidents throughout the operation of the permit or reported within the EMS beyond minor spillages categorised as minor issues that were then dealt with as part of the routine operational procedures by site management. These incidents posed no pollution risk and were not reported to the regulator. These include:

- June 2008 Caustic wash-water released to sewer
- October 2012 Cream spillage from overfilling of tanker spill. The spill was contained

- 2013 loss of 5 litres of hydraulic oil from lorry hose. Cleaned up from hard standing no off-site contamination

One further incident was reported via the regulator in Oct 2015 concerning a possible pollution incident on the Nant Simon, which was investigated and not found to be a result of the activities of Arla.

During the lifetime of the permit it is concluded that have therefore been no records of pollution incidents that may have damaged the ground or groundwater conditions and there were no reportable pollution incidents that may have impacted on ground or groundwater. Through regulatory sign off of investigation the operator is therefore able to demonstrate that, due to the effective measures employed, land and groundwater have been adequately protected and have not deteriorated due to the operations carried out during the lifetime of the permit and are therefore judged to be in a satisfactory state.

A site visit on 06/04/2021 confirmed that all silos and storage tanks and ancillary pipework related to the permitted activities have been removed including the milk intake area and storage tanks, the effluent treatment plant, fuel tanks, bulk chemical storage and cleaning and refrigeration systems.

Satisfactory state

We are satisfied that the necessary measures have been taken to return the site of the regulated facility to a satisfactory state.

In coming to this decision we have had regard to the state of the site before the facility was put into operation.