

Ein cyf/Our ref: EPR/WP3231NB

Mr. Andrew Jones
Health Safety and Environmental Manager
DAIRY PARTNERS (CYMRU WALES) Ltd
The Creamery
Aberarad
Newcastle Emlyn

Dyddiad/Date: 31st January 2021

SA38 9DQ

Dear Mr. Jones

Environmental Permitting (England and Wales) Regulations 2016 (amended)
Regulated facility: The Creamery, Aberarad, Newcastle Emlyn, SA38 9DQ
EPR Permit number: EPR/WP3231NB

Investigation into odour breaches - Odour Technical Note – Dec 2021

Thank you for sending a copy of the recent odour report¹ produced by your contractor (*Air Quality Consultants*). This relates to their second visit to the Dairy Partners facility at Newcastle Emlyn on the 18th of November 2021.

It was understood that this visit and the subsequent report forms part of Dairy Partners' response to their investigations into odour permit breaches and ongoing odour complaint relating to the facility at Newcastle Emlyn.

On the 20th July 2021 a first assessment was undertaken by Dairy Partners odour consultant, following which they recommended a series of odour abatement measures be implemented to reduce the odour impact of the site. Since the July visit, Dairy Partners has reported that several recommended odour abatement measures were installed. Dairy Partners also scheduled a follow-up visit (Nov 2021), the details of which are included in this December report.

It appears that the November re-visit and subsequent report, did not re-examine the potential odour sources at the facility, focussing only on those sources previously identified (i.e. listed in Table 1 in the November report). Section 2 to 3 of the Dec 2021 report appear to be extracts from the previous July submission, therefore we have primarily limited our comment to Sections 4 and 5 only.

¹ Technical Note: Dairy Partners (Cymru Wales Ltd) Odour Review. Dated December 2021 – Air Quality Consultants

Section 4 of the report states that Dairy Partners has implemented the following odour control measures:

- 1. installation of a carbon odour control unit to treat the outlet air released during sludge tanker exports;*
- 2. use of a concrete pad to allow for effective clean up during any sludge spillage during sludge tanker exports;*
- 3. installation of carbon filters on the outlets of the DAF tanks;*
- 4. regular cleaning of the sludge pit (shown as tank 17 in Figure 2) and removal of sludge to an enclosed tank (shown as tank 10 in Figure 2) before offsite tanker removal;*
- 5. tarpaulin covers have been placed over the crude pit and mesh filter tanks; and*
- 6. cleaning of decommissioned tanks.*

However, the report also mentions that some measures have not been implemented. For example, Dairy Partners has not lowered the drop height of liquid discharge pipes in some of the assets inspected. This was reportedly due to the potential for this measure to cause blockages.

The report acknowledges that the weather conditions (particularly wind direction) were not ideal at the time of the November re-survey, but still appears to conclude that malodorous emissions at the time of their re-survey, are less than what they detected in July. However it is important that any re-assessment is undertaken in comparable conditions to the original monitoring exercise (e.g. wind direction and wind speeds) therefore we would not accept that this second monitoring exercise meets that requirement and the exercise needs to be re-scheduled.

There seems to be a contradiction between statements made in sections 4.6/4.8 and section 5.3 of the report, with regards to whether odour was noted offsite at the time of the re-survey. One section implies an odour was noted off-site during the November visit, whilst in another section of the report it suggests that no odours were noted. This needs to be clarified.

It is not evident from the report if the odour consultant has reviewed the design basis for the specification of the odour treatment units installed by Dairy Partners since their July visit (i.e. suitability of the type of carbon drum filter(s) & passive vent carbon filters). The operator should clarify whether this was undertaken (it may have been outside the scope of the Dairy Partners brief), however if it was undertaken please submit the findings of this assessment to NRW.

The report concludes that the additional odour abatement measures:

“appear to be effective at reducing normal operational pollution to a low level”.

However, given the comments noted above and the ongoing nature of the odour complaints that are being received, (which have continued since the installation of these abatement measures), Dairy Partners need to clearly set out how they propose to respond to the ongoing odour issues at the site.

I have also taken the opportunity to provide comment on a few general statements/ points made in the report:

- In section 1.2 of the report it is stated that the EPR permit variation application relating to the new ETP was refused by NRW due to: *“in part, the ongoing odour complaints received from local residents”*. This is not factually correct. The refusal notice sets out all the reasons for refusal but in terms of odour there were two topics that were listed:
 - the Operator had not adequately assessed the odour impact from the new ETP²;
 - the Operator had not demonstrated that the proposals meet the necessary standards as described in BAT. In particular that the proposed open aeration tank meets the necessary BAT standards.
- In section 1.4. of the report the 2006 Waste Treatment BREF is referenced, however this was superseded in 2018.
- There is also a statement in the report that there are only two households that claim the facility is generating an offensive odour. This statement is not correct.
- It is not listed whether the assessment was undertaken in accordance with H4 Guidance³, this should have been stated.
- It is not evident from either report (Jun or Dec 21) whether the open aeration tank was subject to an assessment by the odour consultant during either visit. Can you seek written confirmation from the consultant that this asset was subject to an assessment and provide us with a copy of their findings.

² See Refusal notice for full details.

³ *Additional guidance for H4 Odour Management - How to comply with your environmental permit*

This concludes our comments on the technical note that Dairy Partners submitted recently. The following section covers the new odour abatement systems that we understand Dairy Partners have installed at the site last year.

Odour Abatement Systems – system details and procedures

Some of the odour abatement measures that Dairy Partners installed include the installation of passive activated carbon filters at some potential emission points.

It is understood these include:

- Passive carbon filters fitted to the vents on the DAF 1 Vessel;
- Passive carbon filters fitted to the vents on the DAF 2 Vessel;
- Use of a drum style carbon filter to treat the outlet air from road tanker pumps that are removing sludges from the Sludge Tanks.

Can you therefore please clarify the following and/or provide the information requested:

1. you have previously mentioned that carbon filters have been installed on the vents for all the Sludge Tanks, is this still correct? If so, what type are these? and are there any other vents or outlets e.g. are there vents on the Balance Tank and out of specification tanks?
2. Please provide the original design basis for the specification of the passive vent carbon filters Dairy Partners selected and installed on DAF Tank 1 and DAF Tank 2.
3. Please provide the original design basis for the specification of the Drum (Carbon) filter system installed at the site for sludge tankering operations.
4. Can you provide the maintenance procedures for Dairy Partners passive vent carbon filters and drum (carbon) filter abatement equipment, specifically including the replacement frequency of the filter media and the procedures for assessing this ?

Our response to this report should not be taken to imply any agreement or endorsement by NRW over the suitability of any of odour abatement measures installed by Dairy Partners at the facility, or whether all appropriate abatements measures have been implemented by the operator.

Yours sincerely

Neil Herbert

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Croesewir gohebiaeth yn y Gymraeg a'r Saesneg

Correspondence welcomed in Welsh and English