



GIG
CYMRU
NHS
WALES

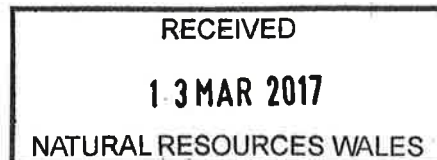
Bwrdd Iechyd Prifysgol
Aneurin Bevan
University Health Board

Our Ref: A1MM671 Direct Line: 01633 435954

9th March 2017

Your Ref: PAN000868

Alys Rook
Waste Permitting Team
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP



Dear Ms Rook

**Environmental Permitting (England and Wales) Regulations 2010:
Bespoke Permit for Waste Management Facility; Mekatek Ltd, Unit C,
Maerdy Industrial Estate, Rhymney. NP22 5PY**

We welcome the opportunity to comment on this permit application. This assessment is based on actual or potential health risks from environmental exposures to chemicals, noise from the proposed operations including emergencies and extreme environmental events such as flooding.

Any recommendations are for consideration by the Regulator and should be reflected in any permit conditions made (see rationale below).

Proposed Operations

The proposed application, by Mekatek Ltd, is for a new waste management facility receiving up to 54,999 tonnes of dry, solid waste per annum. Wastes will include WEEE, fridges (degassed), plastics, glass and limited quantities of hazardous waste in the form of batteries and fluorescent lights.

Bwrdd Iechyd Prifysgol Aneurin Bevan

Pencadlys,
Ysbyty Sant Cadog
Ffordd Y Lodj
Caerllion
Casnewydd
De Cymru NP18 3XQ
Ffôn: 01633 436700
E-bost: abhb.enquiries@wales.nhs.uk

Aneurin Bevan University Health Board

Headquarters
St Cadoc's Hospital
Lodge Road
Caerleon
Newport
South Wales NP18 3XQ
Tel No: 01633 436700
Email: abhb.enquiries@wales.nhs.uk



Bwrdd Iechyd Prifysgol Aneurin Bevan yw enw gweithredol Bwrdd Iechyd Lleol Prifysgol Aneurin Bevan
Aneurin Bevan University Health Board is the operational name of Aneurin Bevan University Local Health Board

Other wastes including paper, card and wood may be received occasionally for temporary storage and onward transfer. Operations will include; segregation, grinding, crushing, cutting, bulking and bailing. There will be capacity on site to store 1000 tonnes non-hazardous and 50 tonnes hazardous waste. The operations will be within a site building and will operate 24 hours on weekdays and between 07:30 and 19:30 on weekends.

The proposed facility will be located on land at Maerdy industrial estate within existing buildings and infrastructure (Unit C). The residential community of Rhymney Garden Village lies less than 200m east of the site. The Rhymney River runs along the western boundary of the site, apparently culverted along the site boundary. The facility has been given planning permission for waste treatment with exemptions.

Overall Conclusion

Based upon the evidence provided, we conclude that the current risk assessment submitted by the applicant, lacks sufficient detail to enable us to comment in terms of public health impacts. Specifically that no assessments or management plans for noise and odour have been submitted, limited information has been provided in respect of flood management despite the location of the site within a C2 Flood Zone, no assessment of traffic impact is presented, and several operational discrepancies appear within the submissions regarding waste types, volumes and storage amounts.

Public Health Risk Assessment

The applicant has provided a qualitative risk assessment for the proposed activities and concludes that risks from activities are low or very low. Control measures contained within an in-house environmental management system document, together with a separate fire risk management document have been provided.

Emissions to air are considered low as no point source emissions will be present, while fugitive dusts are deemed unlikely due to activities indoors. Likewise risks from odours are not expected as wastes will be indoors and no significant quantities of putrescible materials will be accepted. Overall we would agree with the findings but suggest the regulator clarifies if the proposal for storage of up to 499 tonnes of degradable wastes has been considered in the assessment.

Risks from liquid emissions are considered very low as no liquid wastes will be accepted, all activities will be on hard standing and all process liquids (fuels etc) will be stored in bunded areas. Any waste water will be discharged via existing foul sewer arrangements. We would however recommend the regulator be satisfied that adequate consideration has been given regards flood risk in view of the site location, the potential for temporary outdoor storage, and the proximity to the Rhymney River. We would also recommend this considers any potential local abstractions.

Environmental Permitting (England and Wales) Regulations 2010: Bespoke Permit for Waste Management Facility; Mekatek Ltd, Unit C, Maerdy Industrial Estate, Rhymney. NP22 5PY

Impact from noise is deemed low as processing will be within the building. No quantitative assessment of this has been made to support this conclusion. Furthermore the qualitative assessment does not appear to have considered the impact of waste haulage to and from the site or loading and unloading of wastes temporarily stored outside. In view of the presence of a nearby residential area and the proposed night time operations, we recommend that further assessment be considered to confirm the absence of significant impact from noise.

Fire risks have been assessed as low and a management plan has been prepared, using NRW guidance and including details on stockpile sizes, fire breaks and waste rotation. This appears somewhat at odds with the actual site specific activities proposed i.e. rapid turnaround of wastes at the site (7 days) and the limited storage requested (1000 tonnes non-hazardous and 50 tonnes hazardous). As such we recommend this be reviewed by the regulator, particularly as materials listed in the application such as plastics, wood and paper are flammable and can result in prolonged fires.

The company has developed an environmental management system (EMS), not currently accredited. We would suggest they seek accreditation of their EMS at the earliest opportunity.

Finally the site condition report prepared in 2003 submitted with the application only comprises the report cover sheet. Thus we are unable to comment on this.

Any additional information obtained by the Regulator in relation to these comments should be sent to us for consideration. Such information could affect the comments made in this response.

Yours sincerely



Dr Gillian Richardson, MBChB, MRCPGP, MPH, FFPH, MRCPHMI, MInstLM
Executive Director of Public Health (Consultant)
Cyfarwyddwr Gweithredol Iechyd Cyhoeddus (Ymgynghorydd)
Bwrdd Iechyd Prifysgol Aneurin Bevan
Aneurin Bevan University Health Board