

Notice of request for more information

Environmental Permitting (England and
Wales) Regulations 2016

Notice requiring further information

To: Company Secretary
Llantrisant Recycling Centre Ltd
Earthmovers House
Unit 16 Llantrisant Business Park
CF72 8YY

Application number: PAN-001475 (EPR/AB3092FR)

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated **11/04/2017**.

The information requested should be sent to the following address by 24/05/17.

Information should be sent to:

Permitting Service (Cardiff)
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
Hannah Loughlin	09/05/17

Authorised on behalf of Natural Resources Wales

Schedule

Odour management plan.

By the very nature of the activity, composting waste has the potential to produce odour. Therefore it is imperative that you have a robust odour management plan (OMP) in place to prevent and mitigate the risk of odour. We have assessed your OMP in accordance with our guidance – H4 Odour Management and have found that the plan submitted does not address the following areas appropriately:

Monitoring is the main control measure listed for all parts of the composting process although effective monitoring is part of controlling risk it is not the only control measure.

ACTION: Please provide additional information with regards to the control measures in place to prevent odour. These may include odour suppression, quick turnaround times (including contingency plans for if prescribed timescales cannot be met). Also further detail is required in relation to the assessment of materials recoverability, how the operator will ensure the compost stays appropriately aerated and how the appropriate temperature will be maintained.

You have included odour control measures for the leachate but these are not sufficient and more detail is required including what action will be taken if there are extended periods of dry weather.

ACTION: Please provide measures to prevent and control odour from leachate storage.

More detail is also required in relation to the mitigation measure that will be in place onsite. These may include sending waste to other facilities should odour become an issue. These measures should be in place prior to operation commencing.

ACTION: Please provide details of other mitigation measures that will be in place on site other than diverting odorous material off site/back to producer, Or mixing additional dry materials in with the odours wastes.

Additional measures:

You have discussed diverting material due to arrive on site and stop any waste entering site for a few days if there is an odour issue on site, however you have not outlined how you will deal with the material causing odour onsite.

ACTION: Please provide detailed measures that will be in place to manage odorous waste. Suitable measures could include isolating the waste and removing it from site. Your OMP must clearly set out how odorous waste will be stored and how quickly it will be removed from site.

Ffôn/Tel 0300 065 3516

Ffacs/Fax 0300 065 3001

Ebost/Email Hannah.loughlin@cyfoethnaturiolcymru.gov.uk

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Correspondence welcomed in Welsh and English

You have stated the source of the odour will be investigated and the additional measures will be put into place but have not outlined what measures will be put in to place other than stating that un-processed material would be removed from site and if the odour issues were not resolved within 5 days odour suppression systems could be installed. Due to the site's proximity to sensitive receptors leaving the odour for 5 days is not appropriate and a quicker response time would be more suitable. ACTION: Please revise the odour management plan to address all the issues raised above

Street sweepings – processing

We have assessed the section of the EMS relating to this activity and have found that it does not contain enough detail on how this waste will be processed.

There is no infrastructure information – where the waste will be treated, whether this will be on impermeable surface with sealed drainage etc. or what drainage/storage is in place for the water/run-off that comes from the dewatering process. The only information given is that the storage lagoon that is in place for the composting facility will be utilised.

There is no explanation as to how the material will be dewatered, chemically tested, what the mechanical processing of the dewatered fraction will be and how it will be separated out into the organic and inorganic fractions.

It is stated that the waste will be mechanically processed but does not include how this will be done. Please note that depending how the material that remains after dewatering is processed will have an effect on how the fractions left over are coded for removal off site.

No R or D codes have been listed for this process please outline which recovery and disposal codes are required.

The organic fraction to be submitted to the composting process will remain as 20 03 03 as this is what it is being accepted on to site as. If it was being accepted on site after undergoing this process at a different facility it maybe coded as a 19 waste stream.

ACTION: Please provide a revised EMS that includes/addresses all of the information outlined above.

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Open Windrow Composting

We have assessed the EMS and no recovery or disposal codes have been listed.

ACTION: Please provide the R and D codes you wish to cover this activity.

There are a number of conflicts within the information provided in support of the application.

You have stated in the application that the annual throughput of the composting facility will be 10,000 tonnes per annum, however the Site Specific Bio-aerosol Risk Assessment (SSBRA) from Cardiff Metropolitan states that it is 6000 tonnes per annum. Using the windrow information stated in the application our calculations put the maximum annual throughput to be 3500 tonnes per annum.

ACTION: Please confirm what the annual throughput of the site will be and how this figure was achieved based upon the proposed size of windrows (including length, width at base of windrow, width at top of windrow and height), the total number of windrows and the total minimum processing time.

ACTION: Please confirm the minimum processing time for each phase of the process (sanitisation, stabilisation and maturation) as these differ between the documents submitted. The SSBRA states 2.5 to 3 months maturation, the IED calculation within the EMS states 196 days (roughly 6 months) as the minimum processing days, but the time scales set out within the process description within the EMS have the minimum processing time as 105 days (15 weeks/4 months) and maximum processing time as 280 days (40 weeks/10 months).

ACTION: Please confirm how much material will be processed on site at any one time.

If more than 500 tonnes is to be stored and processed on site at any one time a quantitative bio aerosol risk assessment must be supplied – the current bio aerosol risk assessment submitted is not a quantitative risk assessment.

Fire prevention and mitigation plan.

Although a brief FPMP has been included within the EMS supplied it does not address all the areas outlined within the current fire prevention and mitigation plan guidance.

ACTION: Please submit a fire prevention and mitigation plan (FPMP) in line with our current guidance which can be found here:

<https://naturalresources.wales/media/678552/nrw-fire-prevention-guidance-2016v1.pdf>

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