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Lamby Way Open Windrow Composting (OWC) Facility

Kelda Organic Energy (Cardiff) Limited

Environmental Permit (EP) Part Transfer Application

Non-Technical Summary (NTS)

SLR Ref: 407.04012.00009/NTS



February 2015

NON TECHNICAL SUMMARY

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Drawing 002	Environmental Permit Boundary and Site Layout
Drawing 002A	Land Left under Cardiff County Council Control
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APPENDICES

Appendix NTS1	Lamby Way Depot Environmental Permit
Appendix NTS2	Lamby Way Depot Environmental Permit Drawing
Appendix NTS3	European Waste Catalogue (EWC) Codes

1.0 INTRODUCTION

Kelda Organic Energy (Cardiff) Limited (Kelda) has instructed SLR Consulting Limited (SLR) to prepare an application to transfer part of an environmental permit under the Environmental Permitting (England and Wales) Regulations 2010 (as amended) (EPR 2010).

Kelda are applying to transfer the open windrow composting activities only from Cardiff County Council's (CCC) Lamby Way Depot permit (ref: EAWML 30338) into their Kelda's name.

To support this application, the following supporting documentation is submitted in addition to this Non-Technical Summary (NTS):

- Application Forms (Parts A, D2 and F1) and supporting documentation;
- Existing OPRA updated to reflect Kelda's Operator Performance (as requested by Natural Resources Wales, NRW)
- Site Specific H1 Environmental Risk Assessment;
- Site Specific Bioaerosol Risk Assessment;
- Odour Management Plan; and
- Supporting Drawings.

Pre-application advice from NRW has indicated that a Non Technical Summary is to be submitted with this part transfer application to include the following:

- an explanation of exactly what is being applied for;
- a summary of the regulated facilities; and
- a summary of the key technical standards and control measures arising from the risk assessment.

1.1 Existing Site Permit

At present, Lamby Way Composting Facility is regulated by NRW under an environmental permit held issued to Cardiff County Council (CCC) for operations at the Lamby Way Depot (ref: EAWML 30338). The Lamby Way Depot environmental permit regulates a number of activities at the site including:

- Composting in Open Windrows (subject of this part transfer application);
- Composting in Closed Vessels;
- Household Waste Amenity Site;
- Material Recycling Facility; and
- Household, Commercial and Industrial Waste Transfer Station with Treatment.

A copy of CCC's environmental permit (subject of this part transfer application) is included as Appendix NTS1. Appendix NTS2 is a drawing showing CCC's permitted environmental permit boundary.

1.2 The Site

Lamby Way OWC Facility (the site) is located on the western edge of the Wentlooge Levels approximately 4km north east of Cardiff City Centre and 1km south of Rhymney. Access to the site is achieved via the B4239 which is located to the north of the site.

The National Grid Reference for the centre of the site is ST 23010 77658 and the site location is illustrated on Drawing 001 of this application.

The site is located in an isolated open setting away from residential or industrial/commercial land uses. Although Lamby Way Landfill is located adjacent to the north, the nearest property which is likely to be frequently inhabited for prolonged periods of time is GMH Vehicle Recyclers Limited, approximately 205m to the north of the site. The Severn Estuary is located approximately 30m to the east, south and west of the site.

The site address is:

Lamby Way Open Windrow Composting Facility
Lamby Way
Rumney
Cardiff
Glamorgan
CF3 2EH

2.0 PROPOSED TRANSFER OF ACTIVITIES

Kelda propose to transfer the OWC activities from CCC's control. The other activities within CCC's environmental permit including in-vessel composting will remain under CCC's operation.

The area of land currently regulated by the environmental permit will be split between the two parties. Drawing 002 identifies the area of land to be transferred into Kelda's control. Drawing 002A illustrates the area of land which will remain under CCC's control.

2.1 Specified Waste Management Activities

The activities proposed to be transferred are defined under Annex II of the Waste Framework Directive as follows:

- **R3:** Recycling/reclamation of organic substances which are not used as solvents; and
- **R13:** Storage of wastes pending any of the operations numbered R1 to R12 (excluding temporary storage, pending collection, on the site where it is produced).

2.2 Waste Types

Although not listed within the existing environmental permit, the existing working plan for the site confirms that the site is permitted to accept up to 25,000 tonnes per annum at the OWC Facility.

The waste types Kelda propose to accept at the site are listed by European Waste Catalogue (EWC) code in Appendix NTS3.

2.3 Environmental Permit Application Fee

An application fee of £2,920 for the part transfer of the environmental permit has been determined using NRW's Environmental Permitting Charging Scheme 2014-2015.

2.4 Operator Performance Risk Appraisal (OPRA)

The existing OPRA profile for the site has been updated to include the details of Kelda's operator performance, and is submitted with this application.

2.5 Operator Competence

Tom Hall will be the technically competent manager for the OWC Facility following transfer to Kelda. Copies of his WAMITAB certificates are included as Appendix A to the application forms.

3.0 RISK ASSESSMENTS

3.2 Site Specific Environmental Risk Assessment (H1)

A site specific risk assessment has been undertaken to assess the environmental risk posed by the composting facility with respect to fugitive emissions and accidents. The risk assessment has been prepared in accordance with Environment Agency (EA) guidance H1 Annex A (version 2.1), December 2011. Separate risk assessments have been carried for odour and bioaerosol emissions from the facility.

Operational procedures at the site have been developed to monitor and manage amenity risks from the proposed activities and include provision for the monitoring of scavenging birds, vermin, insects and litter, mud on road, dust and noise. The potential impact of the proposed development on surrounding human and environmental receptors is assessed in the H1 assessment and the receptors illustrated on Drawings 003 and 004.

Subject to the implementation of management measures, the conclusion of the assessment is that the proposed activities are unlikely to result in a significant risk to the amenities of the local environment.

The H1 environmental risk assessment (reference 407.04012.00009/H1) is enclosed as Section 5 of this environmental permit application.

To ensure its relevance to future activities the environmental risk assessment has been drafted to reflect Kelda's proposed operations at the site. Kelda are submitting to NRW an environmental permit application for a variation to the permit (once part transferred) concurrently to this part transfer application. The same approach has been adopted with the Odour Management Plan and Bioaerosol Risk Assessment.

3.3 Site Specific Bioaerosol Risk Assessment (SSBRA)

An SSBRA has been produced at the request of NRW. The OWC Facility will treat green waste by open-windrow composting and is located within 250m of locations where people are likely to be present on a frequent or prolonged basis.

As a consequence of receiving, handling and processing waste (including the aerobic decomposition of waste by microorganisms) the potential exists for the release of bioaerosols from the site.

The objective of the SSBRA is to assess the potential for significant risks to human health at sensitive receptors within the vicinity of the plant as a result of bioaerosol releases and to demonstrate that bioaerosols can and will be maintained at appropriate levels.

The qualitative SSBRA has indicated a low risk of impact due to the environmental setting of the site.

Mitigation measures are proposed in the event of unfavourable conditions and these are detailed further in the SSBRA (reference 407.04012.00009/SSBRA) enclosed as Section 6 of this environmental permit application.

No further assessment is considered to be required.

4.0 KEY TECHNICAL STANDARDS AND CONTROL MEASURES

Prior to the operation of the OWC Facility Kelda propose to vary the environmental permit to become an installation permit. As part of the variation application which will be submitted concurrently to this transfer application, Kelda will submit a Best Available Techniques and Operating Techniques document to NRW which will detail the following regarding the OWC Facility;

- management;
- site operations including waste acceptance procedures;
- emissions and monitoring;
- best available techniques; and
- information.

Operational management procedures will ensure that:

- the risks that the activities pose to the environment are identified;
- the measures that are required to minimise the risks are identified;
- the activities are managed in accordance with the management system and operating techniques document;
- performance against the management system is audited at regular intervals; and
- the environmental permit is complied with.

The mitigation measures to be employed at the OWC Facility are outlined in the H1 environmental risk assessment, SSBRA and Odour Management Plan (OMP).

General Principles

In summary, key technical standards and control measures employed at the site will include:

- monitoring of the OW composting process (internal temperature and moisture content) to enable its effective control;
- strict waste acceptance procedures, the prevention of unauthorised waste being accepted on site and the quarantine offsite removal of unauthorised wastes if accepted;
- monitoring of meteorological conditions and the appropriate timing of activities to minimise the potential for offsite impacts;
- twice daily olfactory monitoring;
- the storage and treatment of waste within defined areas of the site, as illustrated on Drawing 002;
- appropriate surface water management via a sealed system;
- the planned preventative maintenance of plant and vehicles;
- appropriately labelling and ensuring the effectiveness of containment measures for tanks storing potentially polluting liquids;
- applying measures as required for the suppression of dust and bioaerosols;
- employing pest control contractors if necessary; and
- ensuring that regular inspections are made of the site, its perimeter, adjoining roads and properties, and any other sensitive receptors to check for litter, mud on roads, dust, pests . If necessary, litter collection will be arranged as soon as possible.

4.1 Odour Management Plan (OMP)

The OMP outlines the methods by which Kelda will systematically assess, minimise and prevent potentially odorous emissions from the OWC Facility in accordance with the requirements of the environmental permit for the site.

The OMP (reference 407.04012.00009/OMP) is enclosed as Section 7 of this environmental permit application.

5.0 CONCLUSION

The overall conclusion from the studies undertaken as part of this application is that there is unlikely to be a significant environmental impact as a result of the transfer of the open windrow composting facility operations from CCC to Kelda.

Kelda is fully committed to ensuring the highest standards are met and will undertake its activities in a manner consistent with best industrial practices and in accordance with the site's management system.

6.0 CLOSURE

This report has been prepared by SLR Consulting Limited with all reasonable skill, care and diligence, and taking account of the manpower and resources devoted to it by agreement with the client. Information reported herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of Kelda Organic Energy (Cardiff) Limited; no warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the client and others in respect of any matters outside the agreed scope of the work.