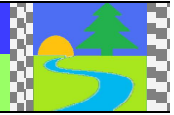


Joe Gatley

Waste Management and Environmental Services

Caldey View, Clos Sant Cenydd, Llangennith, Swansea, SA3 1JT



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

My Ref: NPT/VAR-2016/JG2

Your Ref: PAN-000161

Date: 24<sup>th</sup> March 2016

Sent by Email to: [Llinos.Owen@cyfoethnaturiolcymru.gov.uk](mailto:Llinos.Owen@cyfoethnaturiolcymru.gov.uk)

For the attention of: Llinos Owen, Senior Permitting Officer (RSR and Installations)

Response to request for further information, letter dated 18/03/2016

Application reference: PAN-000161

Operator: Neath Port Talbot Recycling Limited

Facility: Materials Recovery & Energy Centre

Dear Llinos

Thank you for your e-mail and letter titled "*We need more information about your application*" dated 18/03/2016 and your time to discuss the letter and queries you have about the application with me on the telephone yesterday morning.

One of the main areas of concern and misunderstanding with the information provided within the application is:

**1. Storage of Loose RDF**

*The information I have provided needs clarifying and amending, as follows:*

The storage of *all Loose RDF is not to be in any open or external areas, storage is to be in enclosed and roofed areas within the MREC building* in the areas specified **Appendix 2.1 c - Site Layout Plan - Fuel Preparation Area**, specifically **Areas A, B & C**.

Inside storage areas for Baled RDF also includes **Areas B C1 & D**.

*The only outside storage of RDF is in wrapped weatherproof bales* in the External Rear Storage Area as specified in **Appendix 2.1 d - Site Layout Plan - External Rear Storage Area, Area E**.

- These amendments are provided in **an amended** and attached **Appendix 2 - Site Plans (Consolidated) Amended - Revision 1 March 2016**.
- **An amended Appendix 1 - Waste Storage, Recovery & Recycling and Operations Revision 1 March 2016** is also attached with the following amendments to **Section 2, 2.1 Proposed minor changes to (EPR/BJ5775IF/V018) Table S.1.1 activities AR10**

*An extract of these amendments made* are provided overleaf:

/...



AR10

Loose or Baled Refuse Derived Fuel	No more than 400 tonnes of Loose or Baled RDF to be stored on flat floor with push walls in Areas 1.12 A, B & C in the Fuel Preparation Area.
	No more than 1,000 tonnes of Baled RDF to be stored in Area D (Contingency Storage) in the Fuel Preparation Area.
	No more than 3,000 tonnes of Baled RDF in weatherproof packaging to be stored in Area E in the Rear External Storage Area.

Storage of all RDF (Loose or Baled) (existing and proposed) is properly contained which eliminates any likelihood of the release of fugitive emissions (including odour and noise) to air land or water and other sensitive receptors beyond the site boundary.

## 2. On-site Waste to Energy Plant

As described in the application, "This is not the subject of the variation application, the on-site manufacture of dRDF for on-site incineration in the Waste to Energy plant is currently off-line," there are no proposed deletions to references or existing permitted activities to the waste to energy plant, as also discussed and explained to you on the telephone, Section 3.4.1 - Processes of Appendix 1 - Waste Storage, Recovery & Recycling and Operations describes the changes to operations for processing RDF which is to be diverted from densification and on-site incineration / energy production to the manufacture of fuel (RDF) for off-site incineration.

### Subsection 1 Treatment of wastes to produce densified RDF for on-site Incineration

merely describes these changes in accordance with the Process Flowchart Figure 3.4.1 for your information on how the RDF manufacturing, recycling & recovery operations are carried out, as then explained in Subsection 2: Manufacture of SRF/RDF from Combustible Wastes for Energy Recovery

The operator wishes keep all permitted references and activities for the Waste to Energy Plant, there are no intentions to vary any of the existing permissions for these activities, it is acknowledged that as and when the waste to energy plant is refurbished and commissioned at a later date, that all the operating procedures, management systems, monitoring and controls etc. will need to be updated and approved in a future major permit variation application to Natural Resources Wales.

## 3. Storage arrangements and updates to management plans

We don't consider that the proposed minor changes will have any impacts to noise odour fugitive emissions etc., a risk assessment similar to previous submission for changes to storage and treatment operations which was varied (V016) in 2010 is provided in Appendix 1 - Waste Storage, Recovery & Recycling and Operations to the application.



There are no changes to treatment processes or equipment, there are minor changes proposed to storage locations within the buildings and external areas as similar to previous & existing operations, therefore we do not consider that existing management plans need to be updated.

However, we do consider that a Fire Management Plan in line with newly issued NRW guidance will need to be in-place for the storage of RDF in the Rear External Storage Area.

We will provide you with an updated Fire Management Plan in due course and after acceptance of this application, along with other updated management plans your require with justification.

#### **4. Variation Type - Minor Technical Change**

We consider this application meets the criteria provided in **Section 4.3.2 of the Fees and Charges Scheme Guidance** as follows:

##### **A minor technical change will involve some technical input by us but considerably less than for a normal variation**

In the following circumstances a normal variation charge will apply instead of the above for variations:

- **On sites of high public interest or contentious industrial sectors e.g. power station trials, new waste-derived fuels in cement kilns and incinerators etc;**
  - ✓ ***The variation application does not involve combustion or incineration activities*** (only minor changes to existing waste treatment and storage operations) or new waste trials for incineration etc.
  
- **if they are on sites with sensitive receiving environments.**
  - ✓ ***The MREC Facility is not on a sensitive site***, we acknowledge (see risk assessment provided in Appendix 1 to the application) that Crymlyn Bog (SSSI) is approximately 250 meters to the North of the site boundary, however none of the proposed changes give rise to additional emissions are have any existing impacts to Bog.

I hope my comments are clear and that they meet with your approval, however, if you do require further clarification or further information, please do not hesitate to telephone me to discuss further.

Yours sincerely


Joe Gatley



**C.c.** Kevin Stewart [kevin.stewart@nptrecycling.co.uk](mailto:kevin.stewart@nptrecycling.co.uk)  
Neath Port Talbot (Recycling) Limited  
Materials Recovery and Energy Centre,  
Baldwins Crescent,  
Crymlyn Burrows,  
Swansea  
SA1 8PZ

**Enc.**

 Appendix 1 - Waste Storage, Recycling and Recovery Operations - Revision 1 March 2016

 Appendix 2 - Site Plans (Consolidated) Amended - Rev 1 March 2016