

Notice of request for more information

Environmental Permitting (England and Wales) Regulations 2016

Notice requiring further information

To: Company Secretary
Befesa Salt Slags Ltd
Whitchurch Salt Slags
Fenns Bank
Whitchurch
Shropshire
SA13 3PA

Application Number: PAN-002038

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 substantial variation to your environmental permit, duly made on 24 November 2017. This notice has also been sent to your consultant, Dr Bryony Turner (Filkin & Co).

The information requested should be sent to the following address by 16 March 2018.

Information should be sent to:

Chris Roscoe
Permitting Service
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
	15 February 2018

Chris Roscoe, Senior Permitting Officer
Authorised on behalf of Natural Resources Wales

Schedule

1. The ammonia report submitted on 09 January 2018, examines the expected change to airborne ammonia concentrations as a consequence of the variation. The report includes maps showing the process contribution countours and the area of influence of the emissions. Presently the countours display process contributions down to 5% of the precautionary critical level ($1 \mu\text{g}/\text{m}^3$). This is not sufficiently detailed to assess the impact of emissions upon the sensitive features located in different areas of the nearby 'Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses' (Special Area of Conservation and Ramsar) site.

Please submit further dispersion modelling data and maps (similar to figure 5c from the 09 Jan report) which shows more detail as to the expected process contribution at more points in the impacted areas of the Fenns site. In your maps please include contours at every 0.5% intervals, down to the boundary of influence for the emissions (a process contribution of 0%). This will be used to assess the ammonia impacts on sensitive features, located across the Fenn's site.

2. The ammonia report submitted on 09 January 2018 does not contain an assessment of the impact of nitrogen deposition (Nitrogen Critical Load) and acid deposition (Acidity Critical Load) on designated Special Areas of Conservation, Special Protection Areas, or Ramsar sites within 10 km of the installation (as a result of the installations proposed emissions). This will be needed to assess the impact of these emissions upon the features of these sites.

Please submit a dispersion modelling report which considers the impact of nutrient nitrogen and acid deposition on Natura 2000 designated sites within 10 km of the installation. The dispersion model used should use the same modelling parameters as those used in the ammonia report submitted on the 09 January 2018. Only the 'Proposed' scenario from the 09 Jan report will need to be modelled. The Proposed scenario will need to use the same emissions concentrations as those used in the 09 Jan report. This submission should also include the same level of detailed assessment of the impact of the deposition upon the Fenn's site as that described in (1).

3. It is not clear what reference conditions have been used in the description of the stack emission release parameters in the dispersion modelling report submitted on 09 January 2018 (table 5c).

Please submit the proposed ammonia release concentrations for each stack included in the 'Proposed Scenario' model in mg/m^3 . The proposed ammonia concentration values should use the same reference conditions as the Emission Limit Values in your current permit.

4. The ammonia dispersion modelling report submitted on 09 January 2018 shows that residential properties adjacent to the Befesa site (e.g. Bank House, Cambria, White Gates) would expect to be impacted by airborne ammonia as a result of the introduction of the site's new aerial emission point (A7). An assessment is therefore required of the impact of odour emissions on local residents.

Please submit a quantitative risk assessment which considers the impact of odour releases from emission points A2, A5, A6 and A7 on local sensitive receptors

(including any electronic dispersion modelling files). Please note the Environment Agency's horizontal guidance, "H4 Additional guidance for odour management" in the construction of your assessment. As with the ammonia report, this assessment should be performed using emission concentration levels equal to your proposed new Emissions Limit Values for each stack.

The H4 guidance can be found at;

<https://www.gov.uk/government/publications/environmental-permitting-h4-odour-management>

END OF SCHEDULE

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www.naturalresourceswales.gov.uk Correspondence welcomed in Welsh and English