

# Notice of variation with introductory note

Environmental Permitting (England & Wales) Regulations 2016

---

**Biffa Waste Services Limited**

**Trecatti Landfill Site  
Fochriw Road  
Merthyr Tydfil  
CF48 4AB**

Variation number

**EPR/RP3733PC/V013**

Permit number

**EPR/RP3733PC**

# Trecatti Landfill

## Permit number EPR/RP3733PC

### Introductory note

#### **This introductory note does not form a part of the notice**

The following notice gives notice of the variation of an environmental permit.

This variation is to add European waste code (EWC) 10 02 07 (solid wastes from gas treatment containing hazardous substances) to Table S2.4 for the waste to be accepted into the stable non-reactive hazardous waste and asbestos waste cell. The composition of the waste accepted under this waste code is similar to the waste codes that were added in the previous variation.

The schedules specify the changes made to the original permit.

The status log of a permit sets out the permitting history, including any changes to the permit reference number.

<b>Status log of the permit</b>		
<b>Description</b>	<b>Date</b>	<b>Comments</b>
Application EPR/RP3733PC (reference EPR/RP3733PC/A001)	Received 07/05/2004	Duly Made on 21/05/2004
Permit EPR/RP3733PC determined	09/03/2005	
Application for permit variation YP3037UA (reference EPR/RP3733PC/V002)	Received 28/09/2007	Duly Made 09/10/2007
Application for permit variation EPR/DP3037UY (reference EPR/RP3733PC/V003)	Received 17/12/2007	Duly Made 02/01/2008
Variation notice DP3037UY (reference EPR/RP3733PC/V003) determined	18/01/2008	
Variation notice YP3037UA (reference EPR/RP3733PC/V002) determined	14/04/2008	
EA-initiated Variation EPR/RP3733PC/V004 determined	18/01/2011	

Admin variation determined EPR/RP3733PC/V005	17/10/2012	
Admin variation determined EPR/RP3733PC/V006	12/02/2013	
Agency variation determined EPR/RP3733PC/V007	12/06/2013	Agency variation to implement the changes introduced by IED.
Application EPR/RP3733PC/V008	Duly Made 16/05/2014	Application for variation and consolidation of permit to allow the acceptance of asbestos in a dedicated monocell.
Additional information received	13/06/2014	Addendum to Stability Risk Assessment
Additional information received	26/09/2014	Revised Stability Risk Assessment
Additional information received	12/09/2014	Response to Schedule 5 Notice
Additional information received	21/10/2014	Further information relating to Schedule 5 Notice
Additional information received	02/12/2014	Clarification of information relating to Stability Risk Assessment
Permit determined	27/02/2015	Consolidated Permit issued
Application for substantial variation EPR/RP3733PC/V009	Received 04/08/2015	Duly Made 07/08/2015
Application for a substantial variation EPR/RP3733PC/V009 determined	15/01/2015	
Application received EPR/RP3733PC/V010	Duly made 11/07/2018	Application to add additional waste codes to permit
Application determined EPR/RP3733PC/V010	22/08/2018	Varied and consolidated permit issued
Application for substantial variation received EPR/RP3733PC/V011	Received 14/03/2019	Duly Made 14/03/2019 Application to include an asbestos picking station and associated waste codes
Application for a substantial variation EPR/RP3733PC/V011 determined	25/07/2019	Varied and consolidated permit issued
Application for variation EPR/RP3733PC/V012	22/06/2020	Application for minor technical variation to add additional waste to Stable Non-reactive hazardous waste/ asbestos waste cell

Additional information received	Duly made 19/02/2021	Application upgrade to normal variation and amend to include removal of inclinometers
Additional information received	26/07/2021	Response to schedule 5 on compliance with landfill directive
Additional information received	30/09/2021	Waste acceptance procedure and site-specific instructions submitted
Variation Issued EPR/RP3733PC/V012	18/10/2021	Variation and consolidated permit issued to Biffa Waste Services Limited
Application Received EPR/RP3733PC/V013	28/04/2022	Application to add waste code 10 02 07 to stable non-reactive hazardous waste
Additional information received EPR/RP3733PC/V013	07/07/2022	Response to schedule 5 request for additional information on the dust management plan
Variation Issued EPR/RP3733PC/V013	25/07/2022	Variation issued to Biffa Waste Services Limited

#### **Other existing licenses/authorisations/registrations relating to this site**

<b>Operator</b>	<b>Reference Number</b>	<b>Date of issue</b>
Biffa Waste Services Limited	Trade effluent discharge consent (to sewer) reference number TE456	14/04/1993

End of introductory note

## Notice of variation

Environmental Permitting (England and Wales) Regulations 2016

The Natural Resources Body for Wales (“Natural Resources Wales”) in exercise of its powers under regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 varies

Permit number  
**EPR/RP3733PC**

issued to:  
**Biffa Waste Services Limited** (“the operator”)

whose registered office is

**Coronation Road  
Cressex  
High Wycombe  
Bucks  
HP12 3TZ**

company registration number **00946107**

to operate an installation at

**Trecatti Landfill Site  
Fochriw Road  
Merthyr Tydfil  
CF48 4AB**

to the extent set out in the schedules.

The notice shall take effect from 25/07/2022

Signed

Date

<b>Holly Noble</b>	<b>25/07/2022</b>
--------------------	-------------------

Authorised on behalf of Natural Resources Wales

## Schedule 1 – conditions to be deleted

None

## Schedule 2 – conditions to be amended

The following conditions are amended as a result of the application made by the operator

Table S1.2 now reads as:

<b>Table S1.2 Operating techniques</b>		
<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Application	The response to questions 2.1, 2.2, 2.3, 2.4 and 2.5 in part B of the Application;	07/05/2004
	The response to questions raised to the Schedule 4 Further Information Notice dated 21 <sup>st</sup> July 2004;	01/09/2004
	The e-mail from Biffa Waste Services Limited confirming that the Application should include the European Waste Code 16 01 03 as a permitted waste type;	08/03/2005
	With the following exclusions:	
	<ul style="list-style-type: none"><li>• Response to question B2.1.1</li><li>• Response to question B2.1.5; and</li><li>• Response to question B2.2.36 insofar as it applies to monitoring of the surface water discharge; and</li><li>• Response to question B2.2.65 insofar as particulate monitoring is not carried out in accordance with Agency guidance 'M17 - Monitoring of particulate matter in ambient air around waste facilities'; and</li><li>• Response to question B2.2.31 insofar as it applies to the leachate head control and trigger levels; and</li><li>• The proposed methane trigger level for landfill gas boreholes 1-3 as detailed in Table LFGRA21 of the Landfill Gas Risk Assessment; and</li><li>• Response to question B3.1.10 insofar as the proposed CO emission level for the future landfill gas flares (Haase HTN) as detailed in Table LFGRA23 of the Landfill Gas Risk Assessment; and</li><li>• Table 2.10.1 of the generic part B form insofar as it applies to the daily frequency for the monitoring of suspended solids; and</li><li>• The paragraph titled Perimeter Borehole Location and Spacing of section 3.3.2 of the Landfill Gas Risk assessment submitted as part of the Application; and</li><li>• Section 3.3.3 of the Landfill Gas Risk Assessment submitted as part of the Application; and</li><li>• Drawing ESID 4a, entitled 'Site Layout and Waste Deposition' and dated 04/05/04 insofar as it has been superseded by Drawing ESID 4a Rev. 1, entitled 'Site Layout and Waste Deposition' dated 27/08/04; and</li><li>• Drawing ESID7b, entitled 'Leachate Management Construction Details' and dated insofar as it has been superseded by Drawing ESID7b Rev. 1 dated 04/05/04.</li></ul>	

**Table S1.2 Operating techniques**

<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Provision of information	Particulate monitoring information	17/06/2005
Provision of information	Report in response to improvement condition 15a, dated 8 <sup>th</sup> September 2005, on the trace gases found in BH5.	-
Variation application – Remove SNRHW and asbestos waste Ref. DP3037UY	All parts, removing provision to construct a separate cell(s) for SNRHW and asbestos wastes, as detailed on Drawings ESID 4a Rev. 1, and Drawing ESID 4b.	17/12/2007
Variation application – LFG Engines Ref. YP3037UA	The response to questions C2.1 and C2.2 and given in section 1.2, Table 1/1 and Appendix 2 of the Variation Supporting Statement reference 407-0034-00246-002/SS.	28/09/2007
Provision of information	Report 08514290139.500/B.0 on landfill gas management Trecatti landfill site dated March 2009	-
	Action plan for the investigation of the exceedance of groundwater trigger levels in borehole GW2.	21/05/2016
Variation application EPR/RP3733PC/V008	Supporting Statement – Section 2 – Summary of Additional Management Techniques – Report reference BF4857/04	16/05/2014
	Construction and Operational Management Plan – Report reference BF4858/01	
Stability Risk Assessment Review: BF4857/SRA Revision 1 Final issue	All parts	25/09/2014
Nuisance and Health Risk Assessment – Report Reference BF4857/09 rev02	All	21/10/2014
Letter from Stratus in response to concerns relating to stability risk Assessment – Reference BF4858/2/RW001	N/A	02/12/2014
Substantial variation application EPR/RP3733PC/V009	All	04/08/2015

**Table S1.2 Operating techniques**

<b>Description</b>	<b>Parts</b>	<b>Date Received</b>
Substantial variation application EPR/RP3733PC/V011	Best Available Technique and Operating Techniques – Report – Version 1, March 2019 – Report reference 190205.416.00034.00575  Asbestos Management Plan for the Treatment of Asbestos Containing Soils (ACS) at the Trecatti STF – Report STF07/19/2459, January 2019 – Report reference Appendix BATOT01 Trecatti STF Asbestos Management Plan  Environmental Risk Assessment – Report – Version 1, March 2019, Report reference 190205.416.00034.00575 Trecatti Final to EA.  Site Layout Drawings, <ul style="list-style-type: none"> <li>• Site Layout &amp; Environmental Permit Boundary, No. 002, Date 03/19. Reference - 00034.00575.13.002.0a Site Layout&amp;Env Per BDY</li> <li>• Asbestos Picking Station, No. 003, Date 03/19. Reference - 00034.00575.13.003.0a Asbestos Picking Station</li> <li>• Containment Bund Construction Details, No. 005, Date 03/19. Reference - 00034.00575.13.005.0 Containment Bund Construction Details Layout1</li> </ul>	14/03/2019
Variation application EPR/RP3733PC/V012	All Supporting statement BF5029/05 (rev 1; Dated February 2021) <ul style="list-style-type: none"> <li>• Section 3.1: Treatment of leachate from SNRHW asbestos monocell prior to discharge to sewer</li> </ul> Revised SRA: BF5029/SRA (rev 0; Dated February 2021) <ul style="list-style-type: none"> <li>• Section 5.3 and 5.4 Survey Based Monitoring Procedure</li> </ul>	19/02/2021
Response to schedule 5 request for more information	Landfill site specific instruction on waste acceptance SSWI/TR/0 (v2; Dated September 2021)	30/09/2021
Variation application EPR/RP3733PC/V013	Site Specific Work Instruction (V3 dated April 2022)	28/04/2022
Response to schedule 5 request for more information	Dust Management Plan (July 2022)	07/07/2022

Table S1.3 Now reads as

**Table S1.3 Improvement programme requirements**

<b>Reference</b>	<b>Requirement</b>	<b>Date</b>
1	The operator is to implement a geotechnical monitoring system as described in the Stability Risk Assessment Review (SNRHW Cell revision 1 dated September 2014) and is to be monitored at the intervals stated. The monitoring data is to be reviewed annually, compared with the finite element models and the results reported to Natural Resources Wales for approval.	Complete

**Table S1.3 Improvement programme requirements**

Reference	Requirement	Date
2	The operator is to submit for approval by Natural Resources Wales a plan showing additional monitoring points for airborne asbestos fibres at the eastern and northern most perimeter of the site.	Complete
3	The operator is to carry out background monitoring to establish baseline levels of airborne asbestos fibre levels prior to disposal of any asbestos wastes. Once a baseline is established all monitoring points are to be monitored on a 6-monthly basis.	Complete
4	The Operator is to provide a report quantifying how much inert waste is accepted for disposal, how much is to be utilised for engineering purposes and how much will be required for restoration purposes. Using this information, the Operator is to provide a restoration plan specifying appropriate quantities, waste acceptance criteria and waste acceptance procedures for approval to Natural Resources Wales. Upon approval, this Restoration Plan will be incorporated into the Operators Management Plan.	Complete
IC5a	<p>For the first 3 months following the commencement of acceptance of waste under EWC code 10 02 07, the Operator shall undertake monthly monitoring of particulates (PM10) and deposited particles in ambient air in line with the Dust Management Plan (dated July 2022).</p> <p>Once completed, the Operator shall submit a written report to Natural Resources Wales for approval, which details the results of the monitoring.</p>	<p>Within 4 months after of the commencement of waste acceptance under the European waste code 10 02 07* or as otherwise agreed in writing with Natural Resources Wales</p>
IC5b	<p>Following completion of Improvement program requirement 5a, if the monitoring report demonstrates an exceedance in limits detailed in Table S3.12, the Operator shall:</p> <ul style="list-style-type: none"> <li>• Implement suitable mitigation measures to ensure dust is not exceeding the limits detailed in Table S3.12</li> <li>• Complete a revised Dust Management Plan incorporating the proposed mitigation measures.</li> </ul> <p>The Operator shall submit the revised Dust Management Plan to Natural Resources Wales for approval, in writing.</p> <p>Note that this Improvement program requirement will be deemed complete if completion of Improvement program 5a demonstrates that limits in Table S3.12 are not exceeded.</p>	<p>Within 1 month of completion of IC5a</p>

Table S2.4 now read as:

<b>Table S2.4 Permitted Waste types for disposal in the Stable non-reactive hazardous waste and Asbestos Cell</b>	
<b>Waste code</b>	<b>Description</b>
<b>06</b>	<b>WASTES FROM INORGANIC CHEMICAL PROCESSES</b>
<b>06 07</b>	<b>wastes from the MFSU of halogens and halogen chemical processes</b>
06 07 01*	wastes containing asbestos from electrolysis
<b>06 13</b>	<b>wastes from inorganic chemical processes not otherwise specified</b>
06 13 04*	wastes from asbestos processing
<b>07</b>	<b>WASTE FROM ORGAINC CHEMICAL PROCESSES</b>
<b>07 02</b>	<b>wastes from the MFSU of plastics, synthetic rubber and man-made fibres</b>
07 02 11*	sludges from on-site effluent treatment containing hazardous substances
07 02 16*	wastes containing hazardous silicones
<b>10</b>	<b>WASTES FROM THERMAL PROCESSES</b>
<b>10 01</b>	<b>Waste from power stations and other combustion plants (except 19)</b>
10 01 04*	Oil fly ash and boiler dust
10 01 07*	Calcium-based reaction waste from flue-gas desulphurisation in sludge form
10 01 13*	Fly ash from emulsified hydrocarbons used as fuel
10 01 14*	bottom ash, slag and boiler dust from co-incineration containing hazardous substances
10 01 16*	fly ash from co-incineration containing hazardous substances
10 01 18*	wastes from gas cleaning containing hazardous substances (solid and sludge only)
10 01 20*	sludges from on-site effluent treatment containing hazardous substances
<b>10 02</b>	<b>Wastes from the iron and steel industry</b>
10 02 07*	solid wastes from gas treatment containing hazardous substances
<b>10 13</b>	<b>wastes from manufacture of cement, lime and plaster and articles and products made from them</b>
10 13 09*	wastes from asbestos-cement manufacture containing asbestos
<b>12</b>	<b>WASTES FROM SHAPING AND PHYSICAL AND MECHANICAL SURFACE TREATMENT OF METALS AND PLASTICS</b>
<b>12 01</b>	<b>Wastes from shaping and physical and mechanical surface treatment of metals and plastics</b>
12 01 14*	machining sludges containing hazardous substances
12 01 16*	waste blasting material containing hazardous substances
<b>15</b>	<b>WASTE PACKAGING; ABSORBENTS, WIPING CLOTHS, FILTER MATERIALS AND PROTECTIVE CLOTHING NOT OTHERWISE SPECIFIED</b>
<b>15 01</b>	<b>packaging (including separately collected municipal packaging waste)</b>
15 01 11*	metallic packaging containing a dangerous solid porous matrix (for example asbestos), including empty pressure containers
<b>15 02</b>	<b>machining sludges containing hazardous substances</b>
15 02 02*	absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances
<b>16</b>	<b>WASTES NOT OTHERWISE SPECIFIED IN THE LIST</b>
<b>16 01</b>	<b>end-of-life vehicles from different means of transport (including off-road machinery) and wastes from dismantling of end-of-life vehicles and vehicle maintenance (except 13, 14, 16 06 and 16 08)</b>
16 01 11*	brake pads containing asbestos
<b>16 02</b>	<b>wastes from electrical and electronic equipment</b>
16 02 12*	discarded equipment containing free asbestos
<b>16 03</b>	<b>Off-specification batches and unused products</b>
16 03 03*	inorganic wastes containing hazardous substances

**Table S2.4 Permitted Waste types for disposal in the Stable non-reactive hazardous waste and Asbestos Cell**

<b>Waste code</b>	<b>Description</b>
16 03 05*	organic wastes containing hazardous substances
<b>16 11</b>	<b>Waste linings and refractories</b>
16 11 03*	other linings and refractories from metallurgical processes containing hazardous substances
16 11 05*	other linings and refractories from metallurgical processes containing hazardous substances
<b>17</b>	<b>CONSTRUCTION AND DEMOLITION WASTES (INCLUDING EXCAVATED SOIL FROM CONTAMINATED SITES)</b>
<b>17 05</b>	<b>soil (including excavated soil from contaminated sites), stones and dredging spoil</b>
17 05 03*	soil and stones containing Hazardous substances
<b>17 06</b>	<b>insulation materials and asbestos-containing construction materials</b>
17 06 01*	insulation materials containing asbestos
17 06 03*	other insulation materials consisting of or containing dangerous substances
17 06 05*	construction materials containing asbestos <sup>1</sup>
<b>19</b>	<b>WASTES FROM WASTE MANAGEMENT FACILITIES, OFF-SITE WASTE WATER TREATMENT PLANTS AND THE PREPARATION OF WATER INTENDED FOR HUMAN CONSUMPTION AND WATER FOR INDUSTRIAL USE</b>
<b>19 01</b>	<b>wastes from incineration or pyrolysis of waste</b>
19 01 05*	filter cake from gas treatment
19 01 07*	solid wastes from gas treatment
19 01 10*	Spend activated carbon from flue-gas treatment
19 01 11*	Bottom ash and slag containing hazardous substances
19 01 13*	Fly ash containing hazardous substances
19 01 15*	Boiler dust containing hazardous substances
19 01 17*	Pyrolysis wastes containing hazardous substances
<b>19 02</b>	<b>Waste from physico chemical treatment of waste (including dechromatation, decyanidation, neutralisation)</b>
19 02 04*	Premixed wastes composed of at least one hazardous waste
19 02 05*	Sludges from physico/chemical treatment containing hazardous substances
19 02 09*	Solid combustible wastes containing hazardous substances
19 02 11*	Other wastes containing hazardous substances
<b>19 03</b>	<b>Stabilised/solidified wastes</b>
19 03 04*	Wastes marked as hazardous partly stabilised other than 19 03 08
19 03 06*	Wastes marked as hazardous, solidified
19 03 08*	Partly stabilised mercury
<b>19 04</b>	<b>Vitrified waste and wastes from vitrification</b>
19 04 02*	Fly ash and other flue-gas treatment waste
19 04 03*	Non-vitrified solid phase
<b>19 08</b>	<b>Wastes from waste water treatment plants not otherwise specified</b>
19 08 07*	Sludges from regeneration of ion exchangers
19 08 08*	Membrane system waste containing heavy metals
19 08 11*	Sludges containing hazardous substances from biological treatment of industrial waste water
19 08 13*	Sludges containing hazardous substances from other treatment of industrial waste water
<b>19 10</b>	<b>Waste from shredding of metal containing waste</b>
19 10 03*	Fluff-light fraction and dust containing hazardous substances
19 10 05*	Other fractions containing hazardous substances

<sup>1</sup> As far as the landfilling of waste is concerned, Member States may decide to postpone the entry into force of this entry until the establishment of appropriate measures for the treatment and disposal of waste from construction material containing asbestos. These measures are to be established according to the procedure referred to in Article 17 of Council Directive 1999/31/EC on the landfill of waste (OJ L 182,16.7.1999,p.1) and shall be adopted by 16 July 2002 at the latest.'

**Table S2.4 Permitted Waste types for disposal in the Stable non-reactive hazardous waste and Asbestos Cell**

Waste code	Description
<b>19 11</b>	<b>Wastes from oil regeneration</b>
19 11 01*	Spent filter clays
19 11 04*	Waste from cleaning of fuel with bases
19 11 05*	Sludges from on-site effluent treatment containing hazardous substances
19 11 07*	Wastes from flue-gas cleaning
<b>19 12</b>	<b>wastes from the mechanical treatment of waste (for example sorting, crushing, compacting, pelletising) not otherwise specified</b>
19 12 06*	Wood containing hazardous substances
19 12 11*	other wastes (including mixtures of materials) from mechanical treatment of waste containing hazardous substances
19 12 12	other wastes (including mixtures of materials) from mechanical treatment of wastes other than those mentioned in 19 12 11
<b>19 13</b>	<b>Wastes from soil and groundwater remediation</b>
19 13 01*	Solid wastes from soil remediation containing hazardous substances
19 13 03*	Sludges from soil remediation containing hazardous substances
19 13 05*	Sludges from groundwater remediation containing hazardous substances

Table S3.12 now reads as

**Table S3.12 Particulate matter in ambient air – limits and monitoring requirements**

Emission point ref. & location	Parameter	Limit (including unit)	Reference Period	Monitoring frequency	Monitoring standard or method
D1, D2, D3 and D4 identified on Site Monitoring Plan BF4857/10/06 (rev 2).	PM <sup>10</sup>	40µg/m <sup>3</sup> - annual mean. 50µg/m <sup>3</sup> - 24 hour mean, not to be exceeded >35 times per year.	24 hours	Six monthly <sup>1</sup>	As per M17 issued July 2013 'Monitoring of Particulate Matter in ambient air around waste facilities'.
	Deposited particulate	200mg/m <sup>2</sup> day <sup>-1</sup>			
	Asbestos fibres	0.001 asbestos fibres/mL	24 hours	Six monthly	

<sup>1</sup>Monthly for the first 3 months following the commencement of acceptance of waste under EWC 10 02 07 (as detailed in improvement program IC5a) and every 6 months thereafter as detailed in improvement program requirement 5a

### Schedule 3 – conditions to be added

None