

Miss O'Leary-Johns
Welsh Water Organic Energy Ltd
Tremorfa Anaerobic Digestion Facility
Tide Fields Road
Tremorfa
Cardiff,
CF24 5SB

Our ref: PAN-018508
Other ref: EPR/AB3093CA

Date: 21 September 2022

Via e-mail to: Siobhan.o'leary-johns@dwrwymru.com

Dear Miss O'Leary-Johns,

We need more information about your application

Application reference: PAN-018508

Operator: Welsh Water Organic Energy Limited

Facility: Tremorfa Anaerobic Digestion Facility, Tide Fields Road, Tremorfa, Cardiff, CF24 5SB

Thank you for your application received on 30 June 2022. Unfortunately, we need to ask you for some more details before we can consider duly making your application. The additional information required is summarised below.

Form C2 Q2b - Non-Technical Summary

- Within your non-technical summary you have indicated that the inclusion of a new liquid storage tank will result in acceptance of between 30–60m³ per day of liquid waste. By our calculations this will equate to approx. 15,000-21,000 tonnes of liquid waste brought onto site per annum, however it is not clear if this will result in an overall increase in total throughput capacity at the facility, or if the introduction of the liquid waste tonnage will result in a reduction of solid wastes accepted onto site. You have also stated that the liquid waste will replace potable water, which will increase gas yields. Please confirm what the total waste throughput capacity of the site will be, and the anticipated split between solid waste and liquid waste tonnages and anticipated gas yields. If the intention is to increase waste throughput, and increase in gas yields, you will need to submit evidence that shows the sites' design, and infrastructure is capable of accommodating a potential 30% increase in waste throughput. This will need to include evidence that the existing storage tanks (including digesters), gas consumers on site (CHPs, emergency flare) are adequately sized to accommodate the increase in gas production/waste throughput, and that the organic loading rate (OLR) and site retention time will not change as a result of the increase.

Ebost/Email Lucinda.hall@cyfoethnaturiolcymru.gov.uk
Lucinda.hall@naturalresourceswales.gov.uk

Canolfan Trwyddedu Cymru (Caerdydd), Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Wales Permitting Centre (Cardiff), Natural Resources Wales, Cambria House, 29 Newport Road, Cardiff. CF24 0TP

Gwefan/Website www.cyfoethnaturiolcymru.gov.uk
www.naturalresourceswales.gov.uk

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg
Correspondence welcomed in Welsh and English

Form C2 Q6 - Risk Assessments

- In support of a normal variation application, NRW require you to submit an Environmental Risk Assessment (ERA) which describes the environmental risks posed by the changes you are seeking to implement. The ERA should consider hazards and risks from the site as a whole (i.e., the combined risk of existing and new activities to be permitted). The purpose of the ERA is to demonstrate that the impacts from your proposed changes will be acceptable. Please provide an ERA which considers all potential risks posed by the changes you are applying for. Please refer to the Environment Agency's guidance (which NRW also follow) on what we expect from an ERA.

Air Quality Model Input Files

- Please provide the model input files to support the air dispersion modelling report submitted with the application.

Form C3 Q3a - Technical Standards

- NRW require you to submit information describing the standards and measures to be implemented, in order to control the risk of pollution from the changes proposed to your process. This should include an assessment against Best Available Techniques (BAT) to explain how you will comply with relevant indicative BAT for your sector. Please provide details of your operational techniques as well as an updated C3 form with this question answered.

Accident Management Plan

- Please provide an Accident Management Plan. The plan should include changes to managing accidents and emergency scenarios as a result of the changes proposed to site operations.

Form C3 Appendix & - Addition of Biogas Boiler / Medium Combustion Plant

- We need more details on the proposed biogas boiler. You have indicated that the boiler is being transferred from another facility however have stated that it is not 'operational'. Please clarify if the boiler has ever been put into operation, and if so provide proof that the operational start date was before 20th December 2018. Please provide a copy of the boiler specification and confirm the anticipated average load when in use, as well as the applicable NACE code.

Please reply within 10 working days from the date of this letter. If we don't hear from you, we must return your application.

When we receive the missing items we'll continue to check the details in your application. If there's enough there for us to begin the process of deciding whether or not we can grant your application we say the application is 'duly made' and we'll let you know this by letter.

If you email or write to us, please quote the application reference **PAN-018508** on any correspondence and send it to the relevant address below. If you have any questions, please email me at Lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

We would refer you to the following standard guidance, which may be relevant in reviewing your application:

<https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit>
[Control and monitor emissions for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/control-and-monitor-emissions-for-your-environmental-permit)