

Ms. Beth Watson  
WRM Ltd  
18 Manor Square  
Otley  
West Yorkshire  
LS21 3AY

**Our Ref: PAN-019901**

**Date:** 15 February 2023

Sent via e-mail to: [Beth.watson@wrmltd.co.uk](mailto:Beth.watson@wrmltd.co.uk)  
cc: Jennifer Price [admin@bryngroup.co.uk](mailto:admin@bryngroup.co.uk)

Dear Ms. Watson,

**We need more information about your application**

**Application Reference: PAN-019901**

**Operator: Bryn Power Ltd**

**Permit Number: EPR-AB3092ZE**

**Facility: Gelliargwellt Farm Anaerobic Digestion Facility, Gelliargwellt Farm, Gelligaer, Hengoed, Caerphilly CF82 8FY**

Thank you for your application, submitted to us on 10/11/2022 with additional information received on 15/11/2022. We need to ask you for some more information before we can consider duly making your application.

The additional information requested is summarised below:

**Application Fee**

- We have been unable to find evidence of the payment relating to the application fee. Please confirm the date payment was made; account details the fee were sent from; and amount paid, so we can confirm payment has been received.

**Form C2 Q2b – Non-Technical Summary**

- This question has not been answered. Please submit a Non-Technical Summary to support your application.

**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 also consider

Ebost/Email [Lucinda.hall@cyfoethnaturiolcymru.gov.uk](mailto:Lucinda.hall@cyfoethnaturiolcymru.gov.uk)  
[Lucinda.hall@naturalresourceswales.gov.uk](mailto: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](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

hazards and risks from the site as a whole where these may be impacted as a result of the changes proposed. The purpose of the ERA is to demonstrate that the impacts from your proposed changes will be acceptable. Please refer to the Environment Agency's guidance (which NRW also follow) on what we expect from an ERA: [Risk assessments for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/risk-assessments-for-your-environmental-permit) Please provide further assessment for odour and noise where risks cannot be 'screened out' in line with the relevant horizontal guidance note: [Natural Resources Wales / Horizontal Guidance](#).

### **Air Quality Model Input Files**

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

### **CIRIA C736**

- We need to assess your proposed containment measures against recognised standards for all new tanks and storage vessels to be added to your site. Please provide:
  - a full risk assessment of all primary, secondary, and tertiary (where applicable) containment measures on-site where potentially polluting liquids are being stored. The risk assessment and measures should be produced in line with the recognised AD industry standard developed in-line with the CIRIA C736 (2014) guidelines and 'How to comply with your environmental permit (2014)'. Risk assessment should include: a complete and accurate inventory of all new containment vessels and containment measures proposed, including but not limited to all storage and treatment tanks, pipework, chemical reagent storage vessels and bunds. This should include details of construction materials for the storage vessels and bunds, as well as providing P&ID drawings and design specifications.
  - details of capacity of primary containment and any proposed secondary and tertiary containment measures.
  - any proposed improvements to ensure compliance with the above standards and dates for implementation
  - Provide details of the construction of any containment in-line with the CIRIA C736 guidelines
  - Confirm whether the proposed additional tanks area will be serviced with impermeable surfacing and a sealed drainage system. Provide details of the surfacing in line with the CIRIA C736 guidelines.
  - Provide a plan showing the extent of any impermeable surfacing and detail of all containment measures.
  - Provide and justify the planned inspection and maintenance programme
  - any impermeable surfaces, sealed drainage, and containment measures.

### **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

Ebost/Email [Lucinda.hall@cyfoethnaturiolcymru.gov.uk](mailto:Lucinda.hall@cyfoethnaturiolcymru.gov.uk)  
[Lucinda.hall@naturalresourceswales.gov.uk](mailto: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](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

(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.

### **Form C3 Qc – Raw Materials**

- Please provide a full list of all raw materials to be used on site as a result of the changes proposed. This should include details of any anticipated increases in consumption of fuels, water, chemicals etc.

### **Site Layout and Emissions Plan**

- NRW require you to submit a site layout plan which clearly illustrates the location of all existing and newly proposed point source emissions from the site.

### **Process Flow Diagram**

- NRW require you to submit a Process Flow Diagram illustrating the changes you are proposing to implement on site.

### **Form C3 - Appendix 5**

- Questions have not been answered. Please provide answers and document references to all 6 questions within the Appendix 5.

### **Form F1 Q7d – Declaration**

- The declaration on page 5 Section 7d of F1 Form has not been signed by a relevant person. 'Relevant Person' means (in the case of a company) a director, manager, company secretary or any similar officer or employee listed on current appointments in Companies House.

[BRYN POWER LIMITED people - Find and update company information - GOV.UK \(company-information.service.gov.uk\)](https://www.gov.uk/company-information.service.service.gov.uk/people/bryn-power-limited)

If a manager or other employee intends to sign the declaration on behalf of the company, the F1 Form must be accompanied with a letter signed by a relevant person; that is, an officer of the company, confirming that the person has the authority to fill in the declaration.

Please re-submit the F1 form ensuring the declaration has been signed by a relevant person, and that you have completed all other relevant sections of the form.

Please provide the information requested within 10 working days from the date of this letter. If we don't hear from you or adequate information is not provided, we must return your

Ebost/Email [Lucinda.hall@cyfoethnaturiolcymru.gov.uk](mailto:Lucinda.hall@cyfoethnaturiolcymru.gov.uk)  
[Lucinda.hall@naturalresourceswales.gov.uk](mailto: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](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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

application and fee.

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-019901** 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](mailto:Lucinda.hall@naturalresourceswales.gov.uk).

Yours sincerely



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

Ebost/Email [Lucinda.hall@cyfoethnaturiolcymru.gov.uk](mailto:Lucinda.hall@cyfoethnaturiolcymru.gov.uk)  
[Lucinda.hall@naturalresourceswales.gov.uk](mailto: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](http://www.cyfoethnaturiolcymru.gov.uk)  
[www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

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