

Emily Hingston

SOL Environment Ltd  
Unit 5.3 Paintworks  
Arnos Vale  
Bristol  
BS4 3EH

**Our ref: PAN-020996**

**Your ref:**

**Date:** 12/05/2023

Dear Mrs Hingston

**We need more information about your application**

**Application reference: PAN-020996**

**Operator: RDF Energy No. 1 Limited**

**Facility: Land off Tom Lewis Road, Associated British Ports, Alexandra Docks,  
Newport, NP20 2WZ**

Thank you for your application received on 01/03/2023.

I need to ask you for some more information before I can do any more work on it. Please would you provide:

1. A revised OPRA spreadsheet containing completed Air and Water tabs;
2. Justification for the classification of the proposed installation as a waste 'co-incineration' plant that follows the guidance set out in [regulatory guidance document RGN 2: Understanding the Meaning of Regulated Facility](#);
3. A Site Plan that includes the surface water emission point to the Alexandra Dock;
4. An assessment of whether or not the two auxiliary diesel burners comprise a Medium Combustion Plant, as defined in Schedule 25A of the Environmental Permitting (England and Wales) Regulations 2018. If these plant are not MCP, please confirm that they should be treated as a Directly Associated Activity (DAA);
5. A detailed assessment of how the requirements of Article 14 of the Energy Efficiency Directive apply to the proposed installation and unless justified otherwise, an assessment in line with that directive and regulatory [guidance for energy efficiency from combustion and energy from waste power plants](#);

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Permitting Service, 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

6. Justification why, given that the proposed installation will utilise selective non-catalytic reduction abatement, an emission limit for NH<sub>3</sub> (ammonia) has not been included in Table 2.1 of the Air Quality Impact Assessment report, in line with the BAT-AELs described in BAT conclusion 29 of the Waste Incineration BREF 2019;
7. Given that this is new plant which proposes to utilise selective non-catalytic reduction, in line with UK guidance (spreadsheet entitled '210930 Draft UK WI BATC InterpretDoc V0.28', Tab 3 BATc, cell E52 – attached to this letter), please provide an assessment of whether or not an Emission Limit Value (ELV) of 100mg/m<sup>3</sup> for oxides of Nitrogen (NO<sub>x</sub>) (derived from the lower end of the BAT-AEL range described in BAT conclusion 29 of the Waste Incineration BREF 2019) is achievable, and if it is not, provide a cost benefit analysis justifying why lesser performance is appropriate;
8. The software modelling files produced in the air dispersion and noise modelling studies;
9. Evidence of the technical competence of the individuals who carried out the background noise monitoring and general assessment described in the Plant Noise Assessment report;
10. A detailed assessment of the risk of pests at the proposed installation, and a Pest Management Plan if this assessment indicates that the activities are likely to attract pests;
11. A description of how the sampling ports and installation of CEMS in the main stack will be designed in line with the criteria set out in the [Environment Agency guidance Monitoring stack emissions: measurement locations](#) (formerly M1) and confirmation that at the detailed design stage, the design and position of the sampling ports will conform to these criteria; and
12. An assessment showing that containment of potentially polluting liquids at the proposed installation will be done in line with guidance set out in the CIRIA document [Containment systems for the prevention of pollution \(C736F\)](#).

Please also confirm whether or not you would like us to proceed with the determination of this application, or withdraw it, given that RDF Energy No. 1 Limited has recently entered administration.

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

If you email or write to us please quote the application reference PAN-020996 on any correspondence and send it to the relevant address below.

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.

Please quote our reference if you contact us. If you have any questions please phone me on 03000 654064 or email [Victoria.seller@naturalresourceswales.gov.uk](mailto:Victoria.seller@naturalresourceswales.gov.uk).

Yours sincerely

Victoria Seller  
Senior Industry Permitting Officer