

Mrs Emily Hingston
Sol Environment Ltd.
Unit 5.3 Paintworks
Arnos Vale
Bristol
BS4 3EH

Our ref: PAN-020996
Your ref:

Date: 23/05/2023

Dear Mrs Hingston

Returning your permitting application

Application reference: PAN-020996

Operator: RDF Energy No. 1 Ltd.

Facility: RDF Energy No. 1 Ltd., Land off Tom Lewis Road, Associated British Ports, Alexandra Docks, Newport, NP20 2WZ

Thank you for your application received 01/03/2023. We have started to assess your application but unfortunately there is a significant amount of information missing which we require for it to be determined. Your application is therefore not duly made, and we must return it to you.

Please see below for further detail on what information is missing. Note that given the issues identified, we have not completed a full duly making assessment and there may be further matters that need to be addressed. We need you to 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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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 NH₃ (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/m³ for oxides of Nitrogen (NO_x) (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 \(C736F\)](#).

You may resubmit your application, and I understand that it is your intention to do so. We strongly recommend that you review all parts of your application to ensure it meets our requirements. For further advice on your application before resubmitting, please call 0300 065 3000 and ask to speak to your local area office or your Site Officer.

As discussed, as you intend to resubmit your application, we will retain your application fee. We will also hold your place in our work queue until 23/08/2023. If we do not receive a resubmitted application from you within this time period, we must return your application fee. Any application received after 23/08/2023 will be placed at the bottom of our work queue.

If you have any questions please phone me on 0300 654064 or email victoria.seller@naturalresourceswales.gov.uk.

Yours sincerely

Victoria Seller
Senior Industry Permitting Officer