

Application element	Comments / amendments
Part A. Your registered office address on Companies House does not match what is on the current permit. An administrative variation would usually be required for this type of change; either apply for an administrative variation prior to resubmission of this application, or include the change in registered office address as part of your normal variation.	Form C0.5 has been completed which includes the name change in the registered office as part of the normal variation as recommended. Details in Form A have been updated.
OPRA. The OPRA spreadsheet provided is in an unusual format; the "Complexity_Emissions_Location" tab has all answers marked as numbers rather than letters, so can't be read. This needs to be corrected to be in line with the template. I have attached a clean copy of the OPRA spreadsheet for you.	As we operate using the Google infrastructure excel sheets, especially those that are complex including macros are sometimes an issue for us. Hopefully the revised version is correct.
Part C2. Although we do not routinely review technical competence as part of variation applications, we have noticed you have ticked to say that you have provided copies of the TCM certificates but these have not been provided.	Form resubmitted with TCM box unchecked as NRW do not routinely review technical competence as part of variation applications.
Part C4. Table 1a does not mention hazardous storage although you have hazardous waste codes mentioned in your waste code list.	Now updated in the form.
<p>EMS. As mentioned within the return email for your previous application (reference PAN-018803), an Environmental Management System (EMS) Summary needs to be provided for your site, but one has not been provided. The EMS summary must include enough information to allow us to assess whether your full system does meet the standards set out in our guidance. The EMS summary needs to include information on:</p> <ul style="list-style-type: none"> • Waste acceptable procedures • Drainage and infrastructure information • Information on procedures to enable you to apply the waste 	<p>The Veolia Management System 'VMS' is a corporate EMS with hundreds of documents spanning multiple platforms including for example SABA which is an online learning platform. Some elements of the EMS are cross cutting and we would avoid duplication of cross cutting controls and replication of the same controls in multiple procedures where possible as experience shows this makes the system cumbersome and difficult to manage. What we call our Veolia Minimum Requirement 'VMR' is exactly that, a <i>standard</i> which the business applies by site type.</p> <p>The management systems are externally certified by Lloyds Register</p>

- hierarchy of re-use, recover, recycle and dispose
- Duty of care information
- Information on on-site Planned Preventative Maintenance
- Accident and incident information
- Site security, closure and general site complaints
- Any relevant emissions and monitoring information

Further information can be found in our and the Form Part C2 guidance.

to ISO 14001 (Environmental Management), ISO 9001 (Quality Management), ISO 45001 (Health and Safety Management) and ISO 22301 (Business Continuity) and also the Competence Management System (CMS) [in the case of the latter see <https://www.lrqa.com/en-gb/competence-management-system/>]. Veolia runs hundreds of waste transfer and treatment operations across within the UK and has among the best compliance records in the industry. Non-compliance is treated very seriously and all environmental incidents on any scale are reviewed centrally by a dedicated risk and assurance team.

Waste acceptable procedures - please see OPS/2/007 'Transfer Station Operational Control', OPS/TSRDF/019 'TS & RDF Weighbridge Instruction' and OPS/TSRDF/007 'Tipping Hall Instruction'. ELEMOS is the weighbridge management system used by the business and it will not allow operators to virtually accept waste non listed on the permit. The system allows the business to accurately categorise and record information on all material movements including. The European Waste Catalogue (EWC) code declared for incoming waste is in the facility's permitted wastes list before permit access to site, and that the waste is accurately described. The address for the source of material, or depot address for multi-location-collections. The haulier has a valid Waste Carrier Licence (WCL). That all copies of Waste Transfer Notes (WTN) and/or weighing tickets are checked for accuracy and completeness, by both parties, before signing. The area of origin for each incoming load. One copy of the ticket is provided to the customer, and one copy is kept for site records. All actions within Elemos are recorded in an audit trail. They act as a point of reference to determine when, and what, changes were made to an item. Audit records are created and stored with each change to an item. All audit records are date and time stamped.

Drainage and infrastructure information - A surveyed drainage

	<p>plan for the site has been provided. See also Section 5.8 of OPS/2/007 'Transfer Station Operational Control' and section 5 of 'Veolia Minimum Requirements, Transfer Station and Refuse Derived Fuel Production.</p> <p>Information on procedures to enable you to apply the waste hierarchy of re-use, recover, recycle and dispose - application of the waste hierarchy is core Veolia business and is therefore not covered by any site specific procedure as might be the case for an SME. Veolia has a material sales department dedicated to duty of care and application of the waste hierarchy, supporting the circular economy. Please see - https://www.veolia.co.uk/about-circular-economy</p> <p>Duty of care information - please see SYS/2/018 'Waste Duty of Care'. See also section 4 and 13 of 'Veolia Minimum Requirements, Transfer Station and Refuse Derived Fuel Production. Veolia has a material sales department responsible for due diligence in establishing compliant waste transfer options. Information such as third party permits etc is auditable and can be supplied on a customer basis when required.</p> <p>Information on on-site Planned Preventative Maintenance - See Section 5.8 of OPS/2/007 'Transfer Station Operational Control' and See also section 1 of 'Veolia Minimum Requirements, Transfer Station and Refuse Derived Fuel Production. See also HS/2/008 'Workplace Equipment Procedure'. See also 'Fire Schedule Transfer Station 2022' which records testing of the fire systems and 'SERVICE SCHEDULE FOR SITE TRANSFER STATION'</p> <p>Accident and incident information - Site accident and emergency information is not confined to a single document, but these aspects are covered in the Business Continuity Plan, Emergency Plan, FPMP and OMP.</p>
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	<p>Site security, closure and general site complaints - Section 2 of the VMR covers general site security arrangements. Please see SYS/2/007 'Complaints and Non Conformance Reporting'</p> <p>Any relevant emissions and monitoring information - There is no emission point source emissions monitoring required by the current permit and none indicated by the proposed changes. Proactive and reactive monitoring is specified in the OMP, PMP, DEMP and FPMP as appropriate. These documents have all been updated as part of the variation application.</p> <p>In order to demonstrate a competent EMS is in place I have provided the following documents:</p> <ul style="list-style-type: none"> • LRQA - Certificate of Approval for Veolia • Veolia's Management System - Summary Document • CMS - Regulator Communication • Updated Fire Prevention and Management Plan 'FPMP' • Updated Pest Management Plan 'PMP' • Updated Dust and Emissions Management Plan 'DEMP' • Updated Odour Management Plan 'OMP' • Veolia Minimum Requirements, Transfer Station and Refuse Derived Fuel Production • OPS/2/007 - Transfer Station Operational Control • SYS/2/037 - Event reporting and Investigation • SYS/2/007 - Complaints and Non Conformance Reporting • SYS/2/018 - Waste Duty of Care • SYS/2/017 - Permitting and other Statutory Licences • SYS/2/015/001 - Weekly Site Inspection Checklist • SERVICE SCHEDULE FOR SITE TRANSFER STATION [PPM tracker] • UKI/RA/002 - Management Review • OPS/2/026 - Bale Stacking and Storage • UKI/RA/008 - Electricity at Work • SEC/2/001 - Veolia Physical Security Standard
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	<ul style="list-style-type: none"> • OPS/2/004/004 - Vehicle Daily Checklist • HS/2/028/007 - Daily Fire Checksheet • OPS/TSRDF/019 - TS & RDF Weighbridge Instruction • OPS/TSRDF/007 - TS/RDF Operative Tipping Hall Instruction
<p>Risk Assessment. The following items need to be included within your risk assessment:</p> <ul style="list-style-type: none"> • General section on accidents, training and records • Address accidents (such as caused by flooding, fire, electric shocks etc) • Ancient woodlands, local wildlife sites, protected habitats/species, aquifers or surface water courses near to the site 	<p>General section on accidents, training and records - Training would not normally be addressed in an ERA. Veolia's training systems are broad and managed principally on a dedicated software platform called SABA. As part of the Competency Management System there are an array of role specific training modules. Example module titles are listed below as examples.</p> <ul style="list-style-type: none"> • Introduction to CMS • Environmental permitting (3 modules covering the history, application process and general requirements) • Emission and monitoring environmental permit requirements • Records, reporting and notifications • Environmental risk assessment • When environmental management goes wrong • Environmental regulator visits • Top tips for environmental compliance • Environmental amenity issues and complaints handling • Managing Waste Duty of Care <p>All training is recorded and auditable. Flooding is now covered in the risk assessment. Fire risks are covered in the FPMP. Electric shocks would not normally be covered by an environmental risk assessment however see also UKI/RA/008 'Electricity at Work'. There is no single document that covers training records as these are preserved in our dedicated training platform. If you require further evidence on this point I can see if I can capture a screen shot.</p>

	<p>Ancient woodlands, local wildlife sites, protected habitats/species, aquifers or surface water courses near to the site - Now included in the ERA.</p>
<p>The Fire Prevention Mitigation Plan has been updated but still requires some additional information in order for us to duly make the application, including the following:</p> <ul style="list-style-type: none"> • A clear perimeter needs to be available around the edge of the site • The site plan is missing several important details: <ul style="list-style-type: none"> ○ Storage locations of mixed packaging, textile packaging, batteries and accumulators, general glass (only glass packaging bay noted on the plan), metals, insulation materials, gypsum-based construction materials, along with other construction and demolition wastes, any hazardous wastes, medicines, and wastes from markets ○ Areas of natural or unmade ground ○ Location of pollution control equipment (if any is present) ○ Information on drainage systems, foul and surface water drains, their direction and outfall ○ Location of drain covers and any pollution control measures ○ Location of sensitive receptors within 1km of the site including human and environmental receptors • General principles of fire prevention and mitigation within buildings have not been mentioned • No information on waste stack management has been provided, such as contracts in place to ensure there are end user outlets for the materials • No information provided on early stages fire detection • No information provided on the suitability of heavy plant, such 	<p>A clear perimeter needs to be available around the edge of the site - now included.</p> <p>The site plan is missing several important details:</p> <ul style="list-style-type: none"> • Storage locations of mixed packaging, textile packaging, batteries and accumulators, general glass (only glass packaging bay noted on the plan), metals, insulation materials, gypsum-based construction materials, along with other construction and demolition wastes, any hazardous wastes, medicines, and wastes from markets - New notes now added to the drawing, there is a risk where plans are made to be too prescriptive that there will not be sufficient operational flexibility to run the business • Areas of natural or unmade ground - Now included on the plan as a statement. • Location of pollution control equipment (if any is present) - No added to the drawing. • Information on drainage systems, foul and surface water drains, their direction and outfall - A drainage plan has already been submitted see 'Utilities Survey (JPP) ref.22990Y_03' • Location of drain covers and any pollution control measures - The section on 'Control of Fire Water' has been updated to include additional information. • Location of sensitive receptors within 1km of the site including human and environmental receptors - A drawing 'FPP Plan, March 2023' has already been submitted which clearly identifies all sensitive receptors

<p>as enclosed cabs</p> <ul style="list-style-type: none"> • No information provided on how the fire hydrant is suitable for use, or any alternative water sources if required 	<p>General principles of fire prevention and mitigation within buildings have not been mentioned - now included</p> <p>No information on waste stack management has been provided, such as contracts in place to ensure there are end user outlets for the materials - Stack management is included in 2b and outlets are discussed in 1a. Additional information added.</p> <p>No information provided on early stages fire detection - Section on detection now added.</p> <p>No information provided on the suitability of heavy plant, such as enclosed cabs - now updated, available plant have enclosed cabs and air filters.</p> <p>No information provided on how the fire hydrant is suitable for use, or any alternative water sources if required - Information now provided.</p>
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<p>An Odour Management Plan (OMP) has now been submitted, but unfortunately has several issues:</p> <ul style="list-style-type: none"> • An overview of site operations has not been included; this includes operating hours for the site • The site plan does not contain information on site surfacing or monitoring points, and does not show all of the storage locations for the proposed waste types to be accepted on site, as above • Regarding odourous types of waste on site, you have referred to all glass types, including glass packaging. It is not clear why ALL glass is considered odourous, or why only glass packaging is the only packaging type considered to be odours; this may need revision • Waste code 20 03 03 is mentioned within your OMP but is not mentioned in your list of wastes document 	<p>An overview of site operations has not been included; this includes operating hours for the site - now included.</p> <p>The site plan does not contain information on site surfacing or monitoring points, and does not show all of the storage locations for the proposed waste types to be accepted on site, as above - Monitoring points have already been included, they are shown as 'OMP monitoring points' on the plan. Site surfacing should have little impact on odour although this information has been now added as a statement rather than being noted directly on the plan. The locations of potentially odourous waste storage have also been highlighted.</p> <p>Regarding odourous types of waste on site, you have referred to all glass types, including glass packaging. It is not clear why ALL glass is considered odourous, or why only glass packaging is the only packaging type considered to be odours; this may need revision - Chapter 17 and 19 codes have been removed from this section as they are unlikely to present an odour potential, the chapter 15 and 20 packaging and municipal codes are retained.</p> <p>Waste code 20 03 03 is mentioned within your OMP but is not mentioned in your list of wastes document - this has been removed as it is not a waste type that will be accepted by the site.</p>
<p>A Dust Emissions Management Plan (DEMP) has been submitted, but unfortunately has several issues:</p> <ul style="list-style-type: none"> • The DEMP does not provide information on the general site operations including operating hours, waste codes and daily throughput limits • The site plan is missing information on site surfacing, all waste storage areas or visual monitoring points • No specific waste types have been referenced within the 	<p>The DEMP does not provide information on the general site operations including operating hours, waste codes and daily throughput limits - This information has now been included, apart from waste codes which are described elsewhere and not required in the document.</p> <p>The site plan is missing information on site surfacing, all waste storage areas or visual monitoring points - Section 1 of the plan clearly gives two references 'Material Bay Proposed Layout' which</p>

<p>DEMP</p> <ul style="list-style-type: none"> • Weather condition monitoring methods have not been discussed • The DEMP does not outline what will occur in the event of multiple complaints being received in a short amount of time, how records of monitoring and complaints will be kept, or how these records will be reviewed. 	<p>gives the location of all waste storage areas and 'Key Receptor Plan' which gives visual monitoring locations - these are labelled 'DEMP monitoring points'.</p> <p>No specific waste types have been referenced within the DEMP - Waste types are now referenced.</p> <p>Weather condition monitoring methods have not been discussed - details now included in section 3.9</p> <p>The DEMP does not outline what will occur in the event of multiple complaints being received in a short amount of time, how records of monitoring and complaints will be kept, or how these records will be reviewed - Multiple complaints would not necessarily indicate the site was causing a problem as this could be located elsewhere. Table 3.2 of the DEMP (last row) confirms if significant pollution is occurring waste inputs will be stopped and waste will be removed from site.</p> <p>Section 5 of the DEMP along with SYS/2/007 - Complaints and Non Conformance Reporting, SYS/2/037 - Event Reporting and Notification (both now referenced). See also UK1/RA/002 - 'Management Review'. Non compliance is taken extremely seriously within the business which is one reason Veolia has one of the best records in the industry.</p>
<p>A Pest Management Plan has now been submitted, but falls considerably short of our guidance. Please review our How To Comply guidance. Information that needs to be within the plan includes (but is not limited to):</p> <ul style="list-style-type: none"> • Overview of site operations including operating hours, site activities, waste codes and throughput limits • A site plan • All potential sources that could attract pests (only glass waste 	<p>Veolia operates a proactive approach to pest management however site specific pest management plans are usually only indicated for landfill or biowaste activities. The businesses approach to pest management elsewhere is to engage a specialised pest control contractor (currently Rentokill) to audit the site, and recommend mitigation appropriate to the risk. The pest control contractor then makes repeat visits at an agreed interval (monthly in the case of Treforest Transfer Station) to monitor the site and perform routine</p>

<p>has been mentioned)</p> <ul style="list-style-type: none"> • How the plan will be reviewed and how staff will be trained • Information on flies; how numbers and breeding sites will be monitored, any long-term fly prevention methods, trigger levels for general fly control and pesticide treatment etc. 	<p>maintenance e.g. replenishing bait boxes. Once the site expansion is complete the pest control contractor will be instructed to review the scope of mitigation on site and, if required, this will be expended e.g. additional bait boxes. There is rodent activity on site as expected given the repository but no indication this is excessive compared to similar sites and no indication current mitigation is failing.</p> <p>Overview of site operations including operating hours, site activities, waste codes and throughput limits - now added.</p> <p>A site plan - now added.</p> <p>All potential sources that could attract pests (only glass waste has been mentioned) - Relevant waste types were already included (not just glass), the relevant table has now been reformatted.</p> <p>How the plan will be reviewed and how staff will be trained - Now included.</p> <p>Information on flies; how numbers and breeding sites will be monitored, any long-term fly prevention methods, trigger levels for general fly control and pesticide treatment etc. - Section relating to flies added.</p>
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