

Notice of request for more information

Environmental Permitting (England and Wales)
Regulations 2016

Notice requiring further information

To: Hannah Powell
Celsa Manufacturing (UK) Limited
Building 18
Tremorfa Works,
Seawall Road
Cardiff
CF24 5TH

Application number: PAN-018725 (EPR/TP3639BH/V010)

Natural Resources Wales, in exercise of its powers under paragraph 4 of Part 1 of Schedule 5 of the above Regulations, requires you to provide the information detailed in the attached schedule. The information is required in order to determine your application for a permit, dated 17/03/2023. The information requested should be sent to the following address by 24/07/2023.

Information should be sent to:

Permitting Service
Natural Resources Wales
Cambria House
29 Newport Road
Cardiff
CF24 0TP

Name	Date
William Wallace	23/06/2023

Authorised on behalf of Natural Resources Wales

Ffôn/Tel 0300 065 4448
Ebost/Email William.Wallace@cyfoethnaturiolcymru.gov.uk
William.Wallace@naturalresourceswales.gov.uk

Gwasanaeth Trwyddedu, Cyfoeth Naturiol Cymru, Tŷ Cambria, 29 Heol Casnewydd, Caerdydd. CF24 0TP
Permitting Service, 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

Schedule

1. Groundwater discharge

- We would expect as a minimum monitoring be installed (see BAT 7 of the waste treatment BRef), such as monitoring wells both up-gradient and down-gradient of the filter strips to determine both the groundwater baseline quality and the quality of the groundwater after the filter strips have been able to filter out contaminants. The monitoring should reveal no net change from background water quality, up-gradient compared to down-gradient monitoring. Submit details of proposed groundwater monitoring or provide a more detailed explanation and justification as to why it is not possible to monitor groundwater discharge from the soakaways.
- Provide a more detailed technical description on how the Aqua-Xchange works for potential contaminants that they were not designed to filter out. How have you considered these contaminants when selecting the material and have you considered if Aqua-Xchange materials use potentially facilitates the discharge of contaminants that it was not designed to filter out. What additional measures would be in place to mitigate or prevent the discharge of containments that the filter material cannot filter out.
- To what degree has the filter strip design taken into account climate change factors such as tidal surge and extreme rainfall.
- The environmental quality of the specific ground materials and conditions within which the filter strips will be constructed and will operate, must be characterised and assessed as the historic site investigations performed to date have not focused sufficiently and specifically on the filter strip areas.
- Submit a detailed risk assessment on the proposed discharge to ground including a H1 assessment for the substances in line with the environment agencies guidance [Groundwater risk assessment for your environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/groundwater-risk-assessment-for-your-environmental-permit). This should also reference the possible contaminants that could be discharged to ground (with reference to BAT-AEL as described within in BAT 20 of the Waste Treatment BRef).

2. Best available techniques (BAT for waste treatment)

Provide an updated BAT (best available techniques) assessment for waste treatment as outlined in the BAT Reference (BRef) document ([here](#)) assessment demonstrating that all applicable BAT conclusions are met. Insufficient evidence has not been submitted against the following BAT Conclusions to demonstrate compliance:

- BAT 1 - While an ISO14001 certified environment management system (EMS) will meet most of the requirements of BAT 1 it does not meet all of the requirements such as following cleaner technologies, whole life plan consideration, regular sectoral benchmarking etc. Review and provide additional information to demonstrate compliance with all 15 features described within BAT 1.
- BAT 2 - Provide more details on how your waste acceptance criteria meets the requirements of BAT 2 a-g.
- BAT 3 - Provide more details on how your EMS meets all relevant points within this BAT conclusion (BAT 3 i-iii).

- BAT 4 - Provide more details on how your procedures will meet the requirements of the points (BAT 4 a-d) of this BAT conclusion.
- BAT 6 - Provide more details and summarise how your proposed drainage strategy achieves the requirements of this BAT conclusion.
- BAT 7 - Provide more details on how you will achieve this BAT and monitor for emissions to water. In the BAT statement you have said that you will meet this BAT but in the not duly made response it was stated that monitoring would not be done.
- BAT 9 - Provide more details on which of the individual techniques outlined in this BAT are to be implemented in order to achieve the requirements of BAT 9.
- BAT 11 - Provide more details on how you achieve the requirements of this BAT. The original submission only made reference to monitoring of water consumption for dust abatement but have not mentioned the other aspects of this BAT conclusion.
- BAT 14 - Summarise which of the technique(s) (one or more) of BAT 14 (BAT 14 a-h) are applied to meet the requirements of this BAT conclusion.
- BAT 19- Provide more detail on which of the individual techniques outlined in this BAT (BAT 19 a-i) are to be implemented at the site in order to meet the requirements of this BAT conclusion.
- BAT 20
 - Provide more details and summaries on how the drainage strategy and use of filtration strips achieve the BAT.
 - Provide which substances list with BAT-AELs for direct discharge are likely to be within the discharge to ground through the soakaway (both before and after the filtration) and how the techniques applied will allow to reach these limits. If the substance are not applicable provide justification on the reason why they do not apply.
- BAT 21 - Provide more details on how the systems in place will meet the individual BAT conclusions (BAT 21 a-c).
- BAT 26 - Provide more details on how the site's accident management plan (or any other associated documents) meets the requirements of this BAT (including the individual points BAT 26 a-c).
- BAT 27 and BAT 28 - These BAT conclusions are also applicable to mechanical treatment of metal waste by shredding but are not listed in the BAT assessment document (submitted 06/03/2023). Provide details on what techniques are applied to meet the requirements of these BAT conclusions (BAT 27a, BAT 27b and/or BAT 27c and BAT 28).

3. Noise Impact assessment

- Submit a revised noise impact assessment and amended modelling files that does not propose the use of temporary waste piles as a noise barrier.