19 January 2024

SLR Project No.: 416.V00798.00039

WRAP Project Code: COL202-195

NRW Ref: PAN-022050

RE: PAN-022050 Request for Further Information about your Application

We are writing on behalf of Pembrokeshire County Council (PCC) in response to the request for further information issued on 20th December 2023, in support of the Environmental Permit (EP) application for the Pembrokeshire County Council Eco Park in Milford Haven.

For clarity, the questions from Natural Resources Wales (NRW) are listed in the left-hand column with the responses in the right-hand column.

Yours sincerely,

Heather Kerr

SLR Consulting Limited

Enclosures:

Enclosure 01 B4 Form

Enclosure 02 B6.5 Form

Enclosure 03 Drawings

Enclosure 04 FPMP

Enclosure 05 OTD

Enclosure 06 OPRA

Enclosure 07 ERA

Enclosure 08 EMS Documents

Enclosure 09 NIAMP

Enclosure 10 OIA Modelling Files

Enclosure 11 OMP

Enclosure 12 DMP

Enclosure 13 PMP

cc Viktoria Karagits – WRAP Cymru

Rachel Thomas – Pembrokeshire County Council

Sarah Edwards – Pembrokeshire County Council

B4 Form

Question Number	Detail	Response
1	*In Table 1a of the form you have specified a treatment capacity of 50 tonnes per day of hazardous waste. I have assumed that this is an error, as based on Schedule 1, Part 2, Section 5.3 of EPR a capacity of greater than 10 tonnes per day would make the facility an installation subject to the Industrial Emissions Directive.* ***Action: Confirm if you are treating hazardous waste (other than bulking up for onward transport), and if you are treating hazardous waste, clarify the capacity in tonnes per day.***	There is no hazardous waste treatment proposed on site (other than the receipt, storage and bulking up of hazardous materials prior to onward transfer to a suitable permitted alternative facility). A maximum of 50 tonnes of hazardous waste will be stored on site at any one time. Table 1a of NRW's B4 Form, has been updated to clarify this. The updated B4 Form is included as Enclosure 01.
2	*Table 2 – Emissions, this has not been fully completed.* ***Action: Give the emission point reference and location, source, parameter, quantity and unit for the proposed surface water discharge.***	Table 2 of the updated B4 form has been updated to include the emission point reference and location, source, parameter, quantity and unit for the proposed surface water discharge. PCC applied to NRW for a discharge to surface water consent on the 13th December 2023, and the application was duly made on the 18th December 2023 (application reference PAN-024142). The updated B4 Form is included as Enclosure 01.
3	*Under 4a, you have specified 'N/A – no point source emissions', however based on your Operating Techniques Document and Table 2 on Part B4 there is a point source emission to surface water.* ***Action: Provide the information required under question 4a of the Part B4 form.***	Section 4.0 of the updated Operating Techniques Document (OTD) outlines how the discharge to surface water will be monitored. This has been referenced in the updated B4 Form, which is included as Enclosure 01.

Drainage

Question Number	Detail	Response
4	*The drainage arrangements for the facility are not clear to us, section 4.1.1 of the Operating Techniques Document states "The trade effluent drainage is linked to a main holding tank. Before entering the holding tank, the effluent passes through an oil and silt interceptor. The holding tank is connected to the surface water treatment train but is also installed with a shut off valve that can be closed if needed. The effluent is monitored in line with the requirements of the discharge consent. A dedicated sampling point is located prior to the shut off valve. If the effluent meets the requirement of the discharge consent (and is below the limits the surface water treatment train can treat) the shut off valve will be opened and effluent will drain into the bioretention area (the first stage of the surface water treatment train)."* *Under section 4.2 it states "Surface water and treated trade effluent (if in line with the requirements of the discharge consent) will be discharged into the watercourse to the south of the site. PCC have applied for a discharge consent. This is currently being assessed by NRW".* *Our understanding of the above information is that clean surface water run off and surface water run off from areas used in connection with the storage and treatment of waste (trade effluent) are treated through the proposed Sustainable Urban Drainage (SuDS) system before discharging to a surface watercourse. This is contradictory to how the OPRA has been completed (see below) and the risk assessment. We are also not aware of any application for a discharge to surface water being received by NRW as stated.*	PCC applied to NRW for a discharge to surface water consent on the 13th December 2023, and the application was duly made on the 18th December 2023 (application reference PAN-024142). The B6.5 form is included as Enclosure 02. The site benefits from a sealed, engineered drainage system throughout all areas used for waste storage, and treatment as illustrated on Drawing 006. All waste is stored and treated on impermeable concrete surfacing with sealed construction joints and an engineered drainage system, either within the buildings or outside of the buildings. All runoff from waste storage and treatments areas drain to a controlled drainage system. Clean surface water from non-storage areas will drain through a number Sustainable Drainage Systems (SuDS) features to filter run off. Technologies will be in place including a rainwater harvesting system, permeable paving, urban planted rill, and swales. Once treated through the SuDS features, this water will be discharged directly into the watercourse to the south of the site. The SuDS system has been approved by the Sustainable Drainage Approving Body (SAB). Foul drainage will be treated by an approved package treatment plant prior to discharging at the same location as the SuDs system outlet (a discharge consent is currently being considered by NRW). Levels across the site have been designed so that run off from all areas used for the storage and treatment of waste

	Action: Clarify the drainage arrangements for the facility and if there are any discharges to surface water or groundwater. Ensure that the information provided is not contradicted by any of the other supporting documentation. The Drainage Layout Drawing 006 must clearly show the location of any discharge point, it would also be beneficial to show the direction of flow through the drainage system to help us understand the drainage arrangements.	(trade effluent) will flow to the trade effluent drainage system. The trade effluent drainage system at the WTS will be linked to a main holding tank. This tank is not connected to the SuDS system and will be tankered off site when full. The tank will have a high level alarm to alert staff to the requirement to empty in advance of it being full. The trade effluent drainage system at the WRC will be linked to a main holding attenuation tank. The WRC trade effluent will be monitored from a dedicated sampling point from the trade effluent tank in line with the requirements of the discharge consent (application for this consent will be made once adequate trade effluent data has been collected). If the trade effluent meets the requirement of the discharge consent the trade effluent will be pumped from the tank into the attenuation storage and it will flow to the bioretention area (which is the first stage of the SuDS surface water treatment train). The treated trade effluent will then be discharged into the watercourse to the south of the site along with the sites surface and domestic foul waters. PCC will monitor the discharge in accordance with the discharge consent, via an agreed dedicated sampling point. If the WRC trade effluent does not comply with the requirements of the discharge consent, trade effluent will be collected in the trade effluent tank, prior to tankering off site for treatment. This tank will also have a high level alarm to alert staff to the requirement to empty in advance of it being full. Shut off valves, prevent the release of firewater run off from the site. As the site is being constructed in a phased manner the WRC discharge consent will be applied for at the time of construction of this phase (at a later date to the main WTS) and will be in place prior to the option of the WRC. Drawing 006 has been updated to illustrate the location of the surface water discharge point, direction of flow through

		the drainage system, and fall across the site. The updated Drawing is included as Enclosure 03. Section 3.6.1 of the FPMP and the OTD have been updated to clarify the drainage arrangements on site, and are included as Enclosures 04 and 05 respectively.

OPRA

Question Number	Detail	Response
5	*We have checked the OPRA provided and found the following changes required (see attached amended OPRA):* *Assessment under wildlife, countryside or habitats legislation – this was filled out as 'Habitats', however there are no SACs, SPAs, Ramsars or SSSIs within 1km or 2km of the site boundary respectively, therefore this has been amended to 'No'.* *Sensitivity of surface water – this was filled out as 'None', however there appears to be a discharge to the land drain/swale to the south of the site. As there is a discharge but it does not drain into a classified stretch within 1km, and is not known to support salmonids this has been amended to 'Grade 3 or 4'.* *Direct run offs – this was filled out as 'No', however based on the information in the Operating Techniques Document and the Drainage drawing we believe that there is a discharge that can be controlled by a shut off valve. Therefore the answer has been amended to 'Yes – with interceptors'.* *The changes made have not affected the fee required and therefore no additional fee or refund is required.*	N/A – no changes required. The NRW amended OPRA is included as Enclosure 06.

Environmental Risk Assessment

Question Number	Detail	Response

6	*The Environmental Risk Assessment provided does not identify the risk of any discharge to surface water (either direct or incidental), the only pathway identified is "Overland Percolation through the ground". There is no discussion of a direct discharge to surface water, as identified in Form B4 and in your Operating Techniques Document.* *Additionally, not all receptors have been identified including nearby wells and issues to the north of the site, the closest being approx. 100m away from the site boundary (see attached map).* ***Action: Amend your environmental risk assessment to identify the points raised.***	The risk of direct, or incidental discharge to surface water will be managed via the site's comprehensive, engineered, sealed drainage system as illustrated on Drawing 006. Table 5 (Fugitive Risk Assessment and Management Plan), of the Environmental Risk Assessment (ERA) has been updated to assess the risk of any potential discharge to surface water either directly as a result of the discharge consent, or indirectly. Additionally, Section 2.1, and Table 2 of the ERA have been updated to detail the nearby wells to the north of the site. Drawing 002A has been updated to illustrate the location of the wells. The updated ERA and Drawing 002A are included as Enclosures 07 and 03 respectively.

Environmental Management System

Question Number	Detail	Response
7	*We have checked your Operating Techniques Document (OTD) to ensure it covers the basic information we expect from and Environmental Management System, in line with How to comply. There is insufficient information on the storage and treatment of wastes. Treatment procedures are not clear and there is some contradictory information. Section 3 of the OTD states 'No waste treatment will take place on site'. However, elsewhere manual and mechanical sorting, and baling is mentioned. There is also no information on storage of asbestos.* *Our guidance also states that your EMS must include information on the following, which is not demonstrated:* *a) Procedures to enable you to apply the waste hierarchy of re-use, recover, recycle, dispose* *b) Your Duty of Care*	The relevant EMS documents have been provided as supporting evidence on how the site will apply the waste hierarchy (EMS 4.02); the implementation of Duty of Care (EMS2.08); and how the site will be closed and the permit surrendered once operations are decommissioned (EMS4.01). The relevant EMS documents are included as Enclosure 08.

	c) Closure *Whilst we do not require a full copy of your EMS, we need enough information to demonstrate that your full EMS will cover all the required information, and to understand how you are managing the wastes.* ***Action: Amend your Operating Techniques Document and provide information to clarify what wastes are being treated, how they are being treated, and how wastes are being stored (including asbestos). Include information to demonstrate how your full EMS covers the points labelled (a) to (c).***	

Fire Prevention and Mitigation Plan

Question Number	Detail	Response
8	*Site Plan.* *The site plan does not include the following information as required by out FPMP guidance:* *a) Where each waste type is stored or location of hazardous materials – the location of the asbestos storage is not indicated.* *b) Areas of natural and unmade ground – whilst permeable and impermeable surfaces are identified, areas of natural/unmade ground are not.* *c) Location of plant – the location of static plant e.g. baler, separation equipment is not identified.* *d) Drainage system, foul and surface water drains, their direction and outfall – the direction of fall across the site, the direction flow through the drainage network and location of any outfall is not indicated.*	Asbestos will not be accepted on site as standard, under normal operations. Asbestos has been included in the application at this stage to future proof the site and provide maximum operational flexibility. If asbestos were to be accepted on site, it would be stored in a dedicated container in the Waste Recycling Centre (WRC) labelled as "*storage area for potential asbestos acceptance*", on updated Drawing 004. Drawings 004 and 005 have also been updated to illustrate all areas of natural/unmade ground within the proposed permit boundary, and the location of static plant. This consists of 3 x compactors in the WRC area, and 2 x balers, and 1 x sorting line in the Waste Transfer Station (WTS) area.

	Action: Amend the site plan to include the above bullet points.	Updated Drawing 006 illustrates the site's drainage system, including the direction of fall across the site, direction of flow, and the surface water discharge point. The updated drawings are included as Enclosure 03.
9	*Separation Distances.* *Section 2.4.3 of your FPMP states that separation distances are shown on Drawings 004 and 005. However, separation distances between internally stored wastes and building walls, plant and other equipment within buildings (specifically the residual waste building) does not appear to have been considered for all areas, or at least are not shown on the drawing. There are no separation distances shown between waste bays, it is assumed that this is because fire walls are used instead, however these are not identified in the key on the site plan.* *Additionally, there are no separation distances shown on Drawing 004, all waste storage in this area is assumed to be in containers, however please note that in accordance with our guidance for all containers that do not hold more than 1,100 litres they must meet the sizes and separation distances as per Table 2 of our guidance.* ***Action: Amend the FPMP and site plans to show all relevant separation distances and mark fire walls, in line with our guidance.***	Sections 2.4.1 and 2.4.2 of the Fire Prevention and Mitigation Plan (FPMP) have been updated to detail the separation distance arrangements for both the WTS, and the WRC. Separation distances for the WTS are shown on updated Drawing 005. All bays are constructed from Legato Block bay walls therefore reducing the required separation distance. Drawing 005 has been updated to illustrate the bay walls at the WTS. All containers used at the WRC have a capacity of 1,100 litres of waste or more and each container can be accessed to extinguish a fire inside. Therefore, separation distances are not applicable to this area of the site. The updated FPMP, and updated Drawings are included as Enclosures 04 and 03 respectively.

Noise Impact Assessment and Management Plan

Question Number	Detail	Response
10	*We have checked your NIA and NMP against the information required by BS4142 and our guidance Noise and vibration management: environmental permits - GOV.UK (www.gov.uk), we consider the following information to be missing:*	The Noise Impact Assessment and Management Plan (NIAMP) has been updated to include the identified missing information. The updated NIAMP is included as Enclosure 09.

	a) *Statement of competency for all persons contributing to the assessment* b) *Equipment used, including calibrator or pistonphone – details of the latest verification test including dates. Whilst a copy of the certificates is not required, we do require confirmation of the dates of the latest laboratory calibration for the equipment used.* c) *Field calibration test, including meter reading(s) before and after measurements with calibrator – Whilst your report confirms that sound level meters were field calibrated before and after the survey using an acoustic calibrator, and no significant drifts were observed. Meter readings before and after have not been provided.* d) *Weather conditions, including wind speed(s) and direction(s), precipitation, temperature, etc – No information on wind direction has been provided.* e) *Modelling files – we have not received a copy of the CadnA modelling files.* f) *Numerical data as required by guidance Noise impact assessments involving calculations or modelling - GOV.UK (www.gov.uk) – including grid references for fixed or mobile plant, grid references for corner of noise emitting buildings or heights, grid references of site roads, or details of the acoustic barrier i.e. grid references at ends, construction details and thicknesses.* g) *The NMP does not identify sources of noise in normal and abnormal situations.* h) *The NMP does not identify anticipated incidents that may influence noise risk, e.g. weather, breakdowns etc.* ***Action: Amend your NIA and NMP to include the above missing information.***	It should be noted in relation to question c) that meter readings were not recorded in the surveyors notes and therefore cannot be included within the NIAMP. However, the data was signed of by the competent surveyor and stated that no significant drifts were observed, i.e. the drift observed was less than 0.2dB.

Odour Impact Assessment (OIA)

Question Number	Detail	Response
11	*We have not checked the OIA in full at this stage, this will be checked by our technical air quality team. However, it is noted that modelling has been undertaken but we have not received a copy of the modelling files.* ***Action: Provide a copy of the modelling files.***	Modelling files to support the Odour Impact Assessment (OIA) are included as Enclosure 10.

Odour Management Plan (OMP)

Question Number	Detail	Response
12	*The Odour Management Plan (OMP) has been checked against our guidance and management plan requirements, we consider the following information to be missing:* *a) Daily throughput limit* *b) Complaints procedure: Information on what actions will occur in the event of multiple complaints being received in a short time.* *c) How staff will be trained on the OMP.* ***Action: Update your OMP to include the above points.***	The maximum daily throughput limit for the site is 300 tonnes per day. This has been included in the updated Odour Management Plan (OMP). Section 4.8.2 of the OMP has been updated to detail the actions that would be undertaken in the case of multiple complaints. Complaints would be handled and recorded in accordance with EMS2.06 (Complaints Procedure), and EMS2.07 (Complaints Record Form). The relevant EMS procedures are included as Enclosure 08. Section 6.2 of the updated OMP details how staff will be trained. All training will be in line with EMS3.02 (Training and Qualifications Procedure), EMS3.03 (Training Record), and EMS3.04 (Training Matrix). The relevant EMS procedures are included as Enclosure 08. The updated OMP is included as Enclosure 11.

Dust Management Plan

Question Number	Detail	Response
13	*The dust management plan (DMP) has been checked against our guidance and management plan requirements, we consider the following information to be missing:* *a) Daily throughput imit.* ***Action: Update your DMP to include the above points.***	The maximum daily throughput limit for the site is 300 tonnes per day. This has been updated throughout the Dust Management Plan (DMP). The updated DMP is included as Enclosure 12.

Pest Management Plan

Question Number	Detail	Response
14	The Pest Management Plan (PMP) has been reviewed against our guidance and management plan requirements, we consider the following information to be missing: a) An overview of site operations b) Activities undertaken on site c) Daily throughput limit **Action: Update your PMP to include the above points.**	A section titled “Site Operations” has been added to the updated Pest Management Plan (PMP), to detail the proposed operations, and activities undertaken on site. The maximum daily throughput limit for the site is 300 tonnes per day. This has been updated throughout the PMP. The updated PMP is included as Enclosure 13.