

Mrs. Claire Higgins
GD Environmental Services Ltd
Nash Road
Newport
NP18 2BS

**Our Ref: PAN-023590
Other Ref: EPR/XP3833UB**

Date: 08 February 2024

Dear Mrs. Higgins,

We need more information about your application

Application Reference: PAN-023590

Application Type: Minor Technical Variation Application

Operator: G D Environmental Services Ltd

**Facility: East Bank Road Treatment Facility, Units 18A, East Bank Road,
Felnex Industrial Estate, Newport, NP19 4PP**

Thank you for your application, submitted to us on 19/10/2023. Unfortunately, we need to ask you for some more information before we can consider duly making your application. The additional information required is summarised below.

Type of application and associated application fee

In accordance with our guidance, we can accept up to 15 waste type changes as part of a minor technical variation application, provided that those changes are solely to the list of wastes the facility is permitted to accept, and provided the change would not alter the nature of the facility's operation or increase the environmental risk posed.

We are currently unable to determine if the changes you are proposing fall into the category of minor technical variation. Once we have received additional information in response to the questions below, we will confirm the type of application that is required, and what the relevant application fee will be. Please note, if it's determined that the application is a minor technical variation, the applicable fee is £2,614.00 not £1,311.00. (Please note £1,311.00 fee is associated with the 2022-23 charging scheme, whilst £2,614.00 is the fee for 2023-24 charging scheme).

Application Form Part C2

- **Q2b.** We require a more detailed **Non-technical Summary** description to support your application. Specifically we require more details of the nature of the additional 8

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waste types that you propose to accept at the site, and whether these new waste types would alter the nature of the facility's operation or increase the environmental risks posed by their acceptance onto site.

- If the new waste types are similar in nature to the waste types you are already permitted to accept onto site, then providing you can demonstrate sufficient justification and evidence of this, the application will remain within the definition of minor technical variation. If the new waste types introduce new environmental risks or increase existing environmental risks at the site, then you will need to submit additional supporting information with your application (such as an Environmental Risk Assessment). This may also result in your application being upgraded to a normal variation, which would incur additional fees.
- Please clarify which listed activities (as stated within Table S1.1 of your permit) the newly proposed EWC codes will be accepted and processed under.
- Please also confirm which Waste Table(s) as listed within Schedule 2 of the permit, you wish the new EWC codes to be added.
- Please provide details of where and how each new waste stream is to be stored (and/or treated) on site, and confirm if they will be mixed with other wastes for the purposes of store, or will be stored in separately designated containers/areas.
- Please confirm if the introduction of these new waste types will increase the total waste throughput capacity / total storage capacities at the site.

Application Form Part C3

- You have completed and submitted the Part C4 Form in support of your application. This form is to be used for Operators wishing to vary a bespoke waste operation permit. As your existing Permit is a bespoke installation permit, **Part C3 Form** must be completed. Please complete this form and submit it to us, providing all relevant supporting information where applicable.

Supporting Documentation

- Supporting Documents referenced within your submitted application forms and within the summary Table 2 Application list contained within Form Part F1 do not correlate with the documentation submitted with your application. In addition some documents reference on the forms have not been submitted at all. Please review document references within each form, and ensure the references are correct / correlate with supporting documents submitted. You will need to re-submit your application forms with the references updated and/or submit additional documents – as appropriate.

Opra Profile

- The Opra profile submitted with the application is out of date, and does not reference the correct Opra score for the site. Please submit an updated / current copy of your Opra profile.

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.

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If you email or write to us, please quote the application reference **PAN-023590** 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 email me at Lucinda.hall@naturalresourceswales.gov.uk.

Yours sincerely



Lucinda Hall MCIWM BSc (Hons)
Permitting Consultant Installations and RSR Permitting Team

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