

**Natural Resources Wales Permitting Decisions**

**G.D. Environmental Services  
Limited**

**East Bank Road Treatment Facility**

**Decision Document**

## **Natural Resources Wales Permitting Decisions**

### **Application for a Minor Technical Variation**

**The application number is: PAN-023590**

**The permit variation number is: EPR/XP3833UB/V012**

**The Operator / operator is: G.D. Environmental Services Ltd**

**The Installation is located at: East Bank Road Treatment Facility,  
Units 18A East Bank Road, Felnex  
Industrial Estate, Newport, NP19**

#### **Purpose of this document**

This decision document:

- explains how the application has been determined.
- provides a record of the decision-making process.
- shows how all relevant factors have been taken into account.
- provides a record of the decision-making process.
- shows how all relevant factors have been taken into account.
- justifies the specific conditions in the permit other than those in our generic permit template.

Unless the decision document specifies otherwise, we have accepted the Operator's proposals.

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# 1. Executive summary

## 1.1. Application summary

G.D. Environmental Services Limited have applied to vary their existing Installation Permit to add eight (No.8) EWC codes (permitted waste types) to the permit. The new waste types to be added are similar in nature to waste streams already permitted to be accepted onto site.

The additional waste streams will not impact on throughput capacity at the site, which will remain 75,850 tonnes per annum for the entire site. The total maximum throughput capacity of hazardous solid waste will remain at 2,000 tonnes per annum with a maximum storage at any one time of 100 tonnes. The total maximum throughput capacity of hazardous liquid waste will remain at 16,000 tonnes per annum with a maximum storage at any one time of 442 tonnes. The total maximum throughput capacity of hazardous waste oil will remain at 22,850 tonnes per annum with a maximum storage at any one time of 442 tonnes. The total maximum throughput capacity of non-hazardous waste will remain at 10,000 tonnes per annum with a maximum storage at any one time of 150 tonnes.

## 1.2. Our decision

We have decided to issue the variation notice and consolidated permit for East Bank Road Treatment Facility operated by G.D. Environmental Services Limited.

We consider in reaching that decision we have taken into account all relevant considerations and legal requirements and that the permit will ensure that the appropriate level of environmental protection is provided.

## 2. Receipt of the application

The application was received on 19/10/2023. In order for us to be able to consider the application duly made, we needed more information. We requested the following information to be provided:

- Clarification on the type of application and associated application fee;
- More detailed Non-technical Summary;
- Updated application forms;
- Clarification on inconsistencies within supporting documents, and correct document versions / appendices submitted with the application.

Additional information and payment were received on 23/02/2024, 08/03/2024 and 11/03/2024. The application was accepted as duly made on 11/03/2024. This means we considered it was in the correct form and contained sufficient information to begin our determination, but not that it necessarily contained all the information we would need to complete that determination.

## 3. Confidential information

The Operator made no claim for commercial confidentiality, and we have not received information in relation to the application that appears to be confidential in relation to any party.

## 4. Legislation

The variation will be issued, under Regulation 20 of the Environmental Permitting (England and Wales) Regulations 2016 (as amended) (EPR). The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an Installation as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that the decision on this application is consistent with its

general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the variation a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions. NRW is satisfied that this decision is compatible with its general purpose of pursuing the sustainable management of natural resources in relation to Wales and applying the principles of sustainable management of natural resources.

As the EPR regulator in Wales, NRW are required to determine any duly made permit application. This means that we must decide either to grant, or to refuse the variation based upon an objective assessment of the proposals against the detailed legal requirements of EPR. Our public participation statement<sup>1</sup> gives more information on what can, and cannot, be taken into account when making our permitting decision.

The application, and this decision document, only considers the permitting of the facility under EPR as described throughout the document. We only assess the installation and its impacts and cannot take into consideration indirect impacts which are not as a direct result of activity within the installation boundary.

Any proposed development and wider associated activities will be required to be compliant with all relevant and applicable law, for example, environmental law, health and safety law, planning law. This other legislation acts largely independently of EPR (although they may be inter-related). Such other matters are beyond both the scope of this document, and of our regulatory remit and expertise and are not relevant to our EPR permitting decision. Ensuring compliance with all other regulation and obtaining any required consents (such as planning permission) is the responsibility of those undertaking the development and is regulated by the relevant appropriate authority for each.

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<sup>1</sup> [Natural Resources Wales / Public participation: how you can take part in our permit and licence consultations](#)

## 5. The Installation

### 5.1. The permitted activities

The regulated facility is currently an installation which comprises the following activities listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations:

- **Activity Reference A1:** S5.3 A(1)(a)(iii) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving blending or mixing prior to submission to any of the other activities listed in this Section or in Section 5.1.
- **Activity Reference A2:** S5.3 A(1)(a)(ii) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving physico-chemical treatment.
- **Activity Reference A3:** S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment.
- **Activity Reference A4:** Waste Operation Treatment consisting of washing (physico-chemical) and manual separation (mobile plant) of non-hazardous waste into different components for recovery.

### 5.2. Changes to the installation

This variation adds eight (No.8) waste types (EWC codes) to the permit. The new waste types are similar in nature to existing waste streams already permitted / accepted at the site. The new waste types are to be treated under the following existing permitted activities:

- A1 - S5.3 A(1)(a)(iii) Disposal or recovery of hazardous waste in a facility with a capacity exceeding 10 tonnes per day involving blending or mixing prior to

submission to any of the other activities listed in this Section or in Section 5.1;  
and

- A3 - S5.4 A(1) (b) (i) Recovery or a mix of recovery and disposal of non-hazardous waste with a capacity exceeding 75 tonnes per day involving biological treatment.

The additional waste streams will not impact on throughput capacity at the site, which will remain 75,850 tonnes per annum for the entire site. The total maximum throughput capacity of hazardous solid waste will remain at 2,000 tonnes per annum with a maximum storage at any one time of 100 tonnes. The total maximum throughput capacity of hazardous liquid waste will remain at 16,000 tonnes per annum with a maximum storage at any one time of 442 tonnes. The total maximum throughput capacity of hazardous waste oil will remain at 22,850 tonnes per annum with a maximum storage at any one time of 442 tonnes. The total maximum throughput capacity of non-hazardous waste will remain at 10,000 tonnes per annum with a maximum storage at any one time of 150 tonnes.

The following waste codes have been added to the permit.

**Table S2.1 Permitted waste types and quantities for hazardous solid waste for storage in sealed skips**

<b>Maximum quantity</b>	Maximum quantity permitted for storage at any time- 100 tonnes The total maximum quantity of hazardous solid waste, as defined in this table, is 2,000 tonnes per annum.
<b>Waste code</b>	<b>Description</b>
<b>08</b>	<b>WASTES FROM THE MANUFACTURE, FORMULATION, SUPPLY AND USE (MFSU) OF COATINGS (PAINTS, VARNISHES AND VITREOUS ENAMELS), ADHESIVES, SEALANTS AND PRINTING INKS</b>
08 03	wastes from MFSU of printing inks
08 03 17*	waste printing toner containing hazardous substances
08 04	wastes from MFSU of adhesives and sealants (including waterproofing products)
08 04 09*	waste adhesives and sealants containing organic solvents or other hazardous substances

**Table S2.2 Permitted waste types and quantities for hazardous liquid waste storage and treatment**

<b>Maximum quantity</b>	Maximum quantity permitted for storage at any time- 442 tonnes. The total maximum quantity of hazardous liquid waste, as defined in this table, is 16,000 tonnes per annum.
<b>Waste code</b>	<b>Description</b>
<b>08</b>	<b>WASTES FROM THE MANUFACTURE, FORMULATION, SUPPLY AND USE (MFSU) OF COATINGS (PAINTS, VARNISHES AND VITREOUS ENAMELS), ADHESIVES, SEALANTS AND PRINTING INKS</b>
<b>08 03</b>	<b>wastes from MFSU of printing inks</b>
08 03 12*	waste ink containing hazardous substances
<b>08 04</b>	<b>wastes from MFSU of adhesives and sealants (including waterproofing products)</b>
08 04 09*	waste adhesives and sealants containing organic solvents or other hazardous substances



<b>08 05</b>	<b>wastes not otherwise specified in 08</b>
08 05 01*	waste isocyanates

**Table S2.4 Permitted waste types and quantities for non-hazardous waste for storage and treatment**

<b>Maximum quantity</b>	Maximum quantity permitted for storage at any time- 150 tonnes. The total maximum quantity of non-hazardous waste, as defined in this table, is 10,000 tonnes per annum.
<b>Waste code</b>	<b>Description</b>
<b>01</b>	<b>WASTES RESULTING FROM EXPLORATION, MINING, QUARRYING, AND PHYSICAL AND CHEMICAL TREATMENT OF MINERALS</b>
<b>08</b>	<b>WASTES FROM THE MANUFACTURE, FORMULATION, SUPPLY AND USE (MFSU) OF COATINGS (PAINTS, VARNISHES AND VITREOUS ENAMELS), ADHESIVES, SEALANTS AND PRINTING INKS</b>
<b>08 02</b>	<b>wastes from MFSU of other coatings (including ceramic materials)</b>
08 02 02	aqueous sludges containing ceramic materials
<b>08 03</b>	<b>wastes from MFSU of printing inks</b>
08 03 08	aqueous liquid waste containing ink
08 03 13	waste ink other than those mentioned in 08 03 12
08 03 18	waste printing toner other than those mentioned in 08 03 17
<b>08 04</b>	<b>wastes from MFSU of adhesives and sealants (including waterproofing products)</b>
08 04 10	waste adhesives and sealants other than those mentioned in 08 04 09

## 6. Operation of the installation

### 6.1. Operating Techniques

The new waste types to be added are similar in nature to waste streams already permitted to be accepted onto site, thus no changes are required to the Operators existing operational procedures (including pre-acceptance and on-site waste acceptance procedures) and thus the sites existing Environment Management System (EMS), and operating techniques remain fit for purpose and require no changes as a result of this variation and inclusion of addition waste streams.

Based upon the supporting information included within the variation application we are satisfied that existing operating techniques and control measures in place will ensure that appropriate pre-acceptance and on-site waste acceptance checks will continue to remain fit for purpose, and that only suitable waste types will be brought onto site to be processed under permitted operations.

## **6.2. Environmental Risk Assessment**

Based upon the supporting information included within the variation application we are satisfied that the changes proposed as part of this variation pose no additional or new environmental risks requiring technical assessment.

We are therefore satisfied that existing risk assessments and control measures in place continue to remain fit for purpose, and no further assessment is required.

## **6.3. Site Layout Plan**

An updated Site Layout Plan has been provided in support of this variation application (Document Reference: Updated Site Layout Plan - 23-10-GDENV-XP3833UB-001\_4).

# **7. The Permit Conditions**

## **7.1. Incorporating the variation**

We have specified that the Operator must operate the permit in accordance with descriptions in the application. These descriptions have been specified in the Operating Techniques table (Table S1.2) in the permit.

## **7.2. Improvement Conditions**

A number of Improvement Programme Conditions (IPC16 through to IPC23) were included within the permit following Natural Resources Wales initiated review and variation (Variation V009) following the publication of the revised Best Available Techniques (BAT) Reference Document (BRef) for Waste Treatment. These eight (No.8) Improvement Programme Conditions have since been fully satisfied and all IPC responses approved. As a result, Table S1.3 has been updated to reflect the completion of IPC16, IPC17, IPC18, IPC19, IPC20, IPC21, IPC22 and IPC23.

## **7.3. Monitoring**

Schedule 3 of the permit has been updated to remove Schedule 3a which specified emissions monitoring requirements applicable to the site, prior to the Waste Treatment BREF compliance deadline of 17 August 2022. As this deadline has now passed, the redundant tables within Schedule 3a have been removed from the permit.

#### **7.4. Reporting**

Schedule 4 of the permit has been updated to remove Schedule 4a, which specified reporting requirements applicable to the site, prior to the Waste Treatment BREF compliance deadline of 17 August 2022. As this deadline has now passed, the redundant tables within Schedule 4a have been removed from the permit.

### **8. OPRA**

The OPRA score has not changed as a result of this variation which remains as a score of 82.